

The map strategy proposed relies on four pillars, and it is our position that the NBN fails to meet the requirements of Pillar 1 in relation to the industries mentioned above.

Pillar 1 – Serviceability – is described as follows in the MAP statement;

The first pillar is serviceability. Serviceability represents the requirement for there to be a service over the national broadband network which an end user can migrate to.

It is Chubb's opinion that there is no viable service available on NBN to meet the requirements of a high availability PSTN service currently provided by Telstra's copper network. Our opinion is based on a lack of industry suitable battery backup of the NBN Network Termination Device, and a lack of consistency in the service over different RSPs and locations.

I note that in the MAP Framework document the Department has suggested the use of alternative technologies, essentially abandoning Pillar 1 and handing responsibility for these services back to the ASPs. The suggested alternatives do not provide the same diversity of technology or topology as the current copper based PSTN network does, for life safety systems using diverse paths of communications. There are also serious concerns about the availability of some of these technologies in all areas.

It is Chubb position that NBN Co fail to meet the requirements of Pillar 1 in relation to the PSTN services used for Essential Life Safety purposes. Chubb proposes that these PSTN services are therefore a Special service and should be excluded from the disconnection process under the MAP.

Regards

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