

19 August 2015

Jo Grainger
Assistant Secretary – Infrastructure Deployment
Department of Communications

By email: servicecontinuity@communications.gov.au;
migration@communications.gov.au

Dear Ms Grainger,

Telstra submission Migration Assurance Policy Framework

We welcome the opportunity to respond to the Australian Government's latest consultation on its Migration Assurance Policy (**MAP**) Framework for the National Broadband Network (**NBN**). We fully support the Government's objective of improving the NBN migration experience for all customers. We consider that the MAP will help achieve this through providing clarity on the migration process, and by encouraging all parties involved to engage early in the migration window.

We note our overarching views on the Government's MAP were outlined in our submission of 26 September 2014 to the initial MAP consultation process. Rather than restate our views, we refer you to that submission and would like to take this opportunity to comment on the additional detail contained in the latest MAP Framework document.

Roles and responsibilities

Experience to date has shown the successful migration of fixed network customers to the NBN requires the cooperation of many parties. The articulation of the roles and responsibilities of Retail Service Providers (**RSPs**), providers of applications and services operating 'over-the-top' (**OTT**) of fixed telecommunications networks and other industry participants as outlined in the MAP Framework is a welcome step. By identifying the role each party plays and ensuring the proper processes are in place to support those roles, we will achieve an improved NBN migration experience for all customers.

The holistic approach taken by the MAP Framework is an important step in setting out the end to end migration process. The articulation of the roles and responsibilities of a range of stakeholders for the migration of OTT services provides important clarity and certainty for all parties – medical alarm providers, lift phone maintenance providers, fire alarm monitoring providers, building managers, State authorities and industry bodies, RSPs and NBN Co – to understand the part they need to play to assist customers in migrating their OTT services to the NBN.

We consider that the current allocation of roles and responsibilities in the MAP Framework for the migration of OTT services including medical alarms, lift phones and fire alarms will lead to improved migration outcomes for end-users. The allocation recognizes that providers of telecommunication services can only assist their customers to migrate those services the providers supply, and not the services which operate over the top of their telecommunications services, which they have no visibility of. To this end, we consider it is appropriate that the MAP has clarified that the role of an RSP in relation to OTT services is informational in nature, and that product development for substitute OTT services rests with the OTT providers.

End user awareness

Customer awareness of the need to migrate to the new network along with an understanding of what action they need to take to effect migration is a key element of ensuring a successful migration process. As there are multiple parties with a role to play in ensuring migration to the NBN is a success, it is important that communications to end-users are clear, consistent and timely.

Our experience in the initial NBN areas has illustrated the importance of encouraging early migration, especially for customers with special needs and those with multiple and / or complex services. We note NBN Co has committed to working with community groups to improve the communications to customers with special needs. We consider this is an important initiative to reach individuals who may require a more tailored approach to migration, and to promote service continuity for those customers.

The establishment of NBN Co's medical alarm register and fire alarm and lift phone register is another positive initiative for industry. The registers will serve as a single source of truth to allow the better identification of these services prior to their migration to the NBN. The establishment of these registers will continue to assist in ensuring customers of those services are aware of the impending disconnection of their telecommunications services so they can take steps to successfully migrate these OTT services before that date.

NBN Co's Multi-Technology Mix (MTM) rollout

While we acknowledge due to the early stages of the MTM NBN rollout the current MAP framework is centered on Fibre to the Premises (FTTP) technology, it will be important that the Government update its MAP Framework to reflect the NBN Co's MTM rollout once industry processes for MTM are more settled. All stakeholders will need certainty around the different aspects of MTM migration that will need to be managed, and whether (and if so, how) their roles may change. Providing this certainty early in the MTM rollout will assist in ensuring the MAP delivers the outcomes needed for improved migration under the new MTM rollout.

Further to this, a focus on product development by NBN Co, RSPs and OTT providers for the MTM rollout will be key to ensuring that customers have MTM products and services to migrate to as NBN Co progresses its MTM rollout. This will be particularly important for those existing services (for example, fire alarm panels, lift phones etc) that currently rely on battery back-up capability and which we understand NBN Co's MTM rollout will not provide. An early focus on product development and the availability of NBN Co's testing facilities will be needed to enable customer migration well before mandatory disconnection occurs.

MAP monitoring and enforcement

We welcome the MAP as an initiative for industry to adopt and observe. Our experience in the early NBN areas has shown that flexibility is needed to facilitate a smooth migration experience for customers. In this light we agree that the Government should give all stakeholders the opportunity to participate in the MAP Framework to improve migration outcomes before rushing to regulatory solutions. If regulatory solutions are to be considered at a later stage, they should be targeted at those parties who are best placed to address the specific issue at hand.

We believe the MAP is the right forum to allow industry to come together to address key migration issues and continue to improve the NBN migration experience for all customers. Clarity of roles of all participants provides the framework to allow each party to perform their roles more effectively and address the key issues experienced to date with NBN migration.

We look forward to working with the Government and other industry participants in the MAP process to drive a better migration experience.

Should you have further queries or wish to discuss this matter, please contact me or Christine Williams [REDACTED].

Yours sincerely



Jane van Beelen
Executive Director
Regulatory Affairs
[REDACTED]