

## CONSULTATION ON MIGRATION ASSURANCE POLICY – RESPONSE BY iiNET

### 1. Introduction

The Australian Government has released a draft Migration Assurance Policy (**draft MAP**).

The Government is seeking comments on the draft MAP. iiNet welcomes the opportunity to provide comments on the draft MAP.

### 2. iiNet's comments on the draft MAP

A network migration of the scale of the migration to the NBN is unprecedented in the history of telecommunications in Australia. Migration to the NBN obviously requires careful planning and coordination between a number of different parties, including NBN Co, Telstra, RSPs, application service providers and customers. iiNet believes that, given the number of different stakeholders involved, and the fact that no single party is responsible for the end to end migration process, it is desirable that an overall migration policy framework is developed. Accordingly, iiNet supports the development of a migration assurance policy.

In general terms, iiNet believes that the draft MAP has a logical and clear structure. iiNet makes the following specific comments about the draft MAP:

- iiNet agrees that migration processes should, at least to start with, be industry led rather than regulated. However, it is important that 'industry' means the whole industry and that all participants have an opportunity to be consulted and provide input rather than Telstra and NBN Co unilaterally developing processes that are imposed on industry.
- iiNet believes that it is important that the MAP does not simply limit itself to NBN Co, Telstra and RSPs but that the MAP also acknowledges that application service providers and customers also have an important role to play in ensuring that migration occurs smoothly. This is particularly important as regards service continuity of application services that RSPs may have no knowledge or visibility of. iiNet therefore welcomes the fact that the draft MAP seeks to deal with the complete migration process and the draft MAP identifies that application service providers and customers have important responsibilities within that process.
- The draft MAP is set in the context of FTTP technology. FTTN/B technologies have the potential to give rise to significant discrete issues (for example issues relating to voiceband continuity during the migration window). iiNet believes that the MAP should expressly acknowledge that the development of any new processes should be subject to full industry consultation.
- iiNet acknowledges that migration arrangements should be consistent with the broader regulatory framework. However, iiNet believes that regulatory bodies could play a useful role in the migration process by proactively clarifying their position on issues of potential uncertainty that could arise when existing broader regulation is applied to particular scenarios that may arise during the migration to the NBN (for example the extent to which the Customer Service Guarantee applies in respect of

delays to re-establishing a voiceband service where a voiceband continuity service is provided).

- As regards responsibilities in respect of customer wiring, iiNet believes that the MAP should expressly acknowledge that supplying an NBN Service does not lead to an RSP having any responsibility in respect of wiring on the customer side of the network boundary. iiNet believes that the draft MAP does not acknowledge this clearly enough and the current drafting could give rise to confusion.<sup>1</sup>

**iiNet Limited**  
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<sup>1</sup> The draft MAP includes two references to customer wiring in the context of the role of the RSP – at pages 15 and 28.