



28 August, 2015

Jo Grainger
Assistant Secretary, Infrastructure Deployment Branch
Department of Communications
38 Sydney Avenue
Forrest ACT 2603

Dear Ms Grainger

nbn appreciates the efforts of the Department of Communications to develop a policy and framework to improve the migration experience from legacy copper to the **nbn**[™] network for consumers and businesses via better coordination of the various organisations and individuals involved.

We welcome the opportunity to contribute to this process and to provide a response to the consultation papers.

The work of **nbn** represents a once-in-a-generation opportunity to upgrade Australia's broadband infrastructure enabling Australians to better participate in the digital economy of the 21st century. However we recognise that the migration process is possibly unique in the world and presents some challenges to retail service providers (RSPs), application service providers (ASPs), telecommunications and related companies, Telstra and **nbn** as well as residential and business users of migrating services.

nbn believes the Migration Assurance Policy (MAP) sets a clear framework for industry and **nbn** in undertaking their respective roles in addressing all four pillars:

- 1) Serviceability
- 2) Product availability
- 3) End-user awareness and management, and
- 4) Installation and activation

The ability of **nbn** and the industry to fulfil these pillar activities is underpinned by foundation commitments to information sharing and undertaking of nominated roles and responsibilities. **nbn** has been working with Telstra and industry on significant improvements to the migration and disconnection process building on learnings from the first 31 FSAMs. We believe the new arrangements, including the changes to the Migration Plan, provide for a smoother migration and disconnection process for industry and end users. Establishing this firm foundation will be important as **nbn** works with industry on further process changes to deliver the Multi-Technology Mix rollout, incorporating FTTN and HFC access technologies.

Our discussions with international colleagues indicate, to their knowledge, there are no comparable projects to **nbn**'s where a non-incumbent telecommunications company is building a network to which all eligible services must migrate and then have copper services disconnected. There are distinct benefits in the Australian approach, in that it will lead to the separation of retail service provision from the wholesale network builder, giving RSPs open access to a wholesale-only network on non-discriminatory terms. However, it does mean that consideration needs to be given to the migration of services that usually operate over the top of the network, often without the complete knowledge of the RSP or network provider.

The migration of monitored medical alarms is of particular concern to **nbn**. We are working closely with the medical alarm industry to establish a scheme to support and manage the migration of monitored medical alarms given the special needs of those alarm users, and also their general reliance on low and fixed incomes.



We are also concerned with the facilitation of the safe and timely migration of telecommunications services supporting back-to-base fire alarm panels and emergency telephones in lifts. While those responsible for the operation and maintenance of these services are usually businesses or bodies corporate, and therefore not in the same vulnerable category as monitored medical alarm users, they do support safety-critical services and are complex migrations to manage.

To support this migration and service continuity (and in line with the MAP) **nbn** is developing a Fire & Lift Register and it is imperative that all Fire and Lift ASPs, bodies corporate, building managers and owners of complex premises or multi-dwelling units which have fire alarm panels and lift phones register the correct telephone number (FNN) of the relevant services. We note however that while a complete and reliable Fire & Lift Register is important, proactive action is required by the various parties engaged in the migration process to minimise the risk of services being disconnected before they have been migrated.

The migration assurance policy and framework go a long way in clarifying the roles of the various parties in a successful fire alarm and lift phone migration process, with the building manager/body corporate having prime migration responsibility assisted by their ASPs in finding an alternative workable solution. The interactions between the various parties may need further clarification and reinforcement in due course and we look forward to working further with industry on these matters.

Regards,

A handwritten signature in blue ink, appearing to be 'Kat Stapleton', written over a circular stamp or watermark.

Kat Stapleton
Executive General Manager, Market Migration and Disconnection
nbn