28 August 2015

Mr Drew Clarke
Secretary
Department of Communications
38 Sydney Avenue
Forrest ACT 2603

Dear Mr Clarke

Draft Migration Assurance Policy - Improving the transition to the fixed-line national broadband network

Internet Australia (IA) welcomes the opportunity to provide comments on the Draft Migration Assurance Policy ("Draft policy").

Introduction

As the peak body representing everyone who uses the Internet IA has consistently advocated the need for ubiquitous high speed broadband as critical for innovation and economic growth in a digitally enabled economy. It is also essential for the delivery of government services such as e-health and online education and training.

https://www.internet.org.au/docs/media/399-24-august-2015-news-release-internet-australia-nbn-needs-bipartisan-support/file

The Draft Policy is directed at migration for fixed line services. However, there is bipartisan support for rollout of the NBN in regional, rural and remote areas in the same timeframe as for roll out for broadband fixed line services. We therefore note that he difficulties that some of our members have reported in the migration process for wireless solutions raise issues that would be common for both fixed and wireless services.

The Migration Policy Assurance Statement discusses four 'pillars' for a successful migration and disconnect process. This submission will focus on the third 'pillar', which is End User Awareness and Management.[1]

Of the nine Migration Assurance Principles, three are particularly important for end users:

1. Migration should be an end user focused and industry-led activity in which interdependencies between the different activities and parties are closely managed. This will minimise adverse impacts on end users, prioritise continuity of service and provide for the appropriate treatment

---

[1] Migration Assurance Policy Statement, July 2015, page 5

of vulnerable people in the community.

2. Migration processes should be managed in a predictable and straightforward manner so that reasonable certainty is provided to all stakeholders, particularly end users.

3. Provision of migration information should be timely, accurate and consistent. The flow of information between all parties should be, to the extent possible, all-inclusive and allow for transparency of any identified migration issues.

Minimise adverse impacts and prioritise continuity of service

One area of concern for end users is when an area has been declared by NBN as ready for services but when technicians arrive to connect the service it proves not possible for various technical reasons. At this stage, the potential customer is left in limbo and arrangements made with an RSP cannot proceed.

Further, it is reportedly often unclear to the customer if their service will be upgraded, and if so, when. If the customer is experiencing poor service, and connection to NBN is not possible, maintenance of the existing quality must be maintained until such time as the service is upgraded to NBN standard.

Provision of migration information should be timely, accurate and consistent

Another area of concern for customers is the lack of information available to them from NBN. Specifically, the concerns expressed to us are:

• not being able to get any set time-frames on delivery of services
• not knowing who to ask when the process isn't working
• no single party seems to be responsible nor accountable for the process from the customer perspective.
• wholesalers say they are having difficulties following the NBN procedures

While NBN's website does have facility for contact with NBN personnel, our feedback suggests it is not as visible as it might be.

The TIO also handles complaints about NBN, and those complaints are increasing.[2] The main areas of complaint in the past year are about connection delays, unusable services and missed connection appointments. Indeed, the two themes of complaints are either a breakdown in communications, or available information not matching the customer's individual circumstances. Other issues the TIO has raised with providers include copper services disconnected before NBN services are connected, and customers being charged for NBN services before they are even connected.

---

[2] Telecommunications Industry Ombudsman, Annual Report 2014, page 32

To address issues raised, IA recommends:

- making the migration – from start to finish, process publicly available and clear
- creating checkpoints at each stage of the process that identify each party's responsibility and actions that must occur before moving to the next stage
- ensuring that end users and other relevant parties in the migration process know where to go if there is a delay in the process and that parties in the process can easily identify process failures.
- providing information to end users about the TIO as the complaints handling body that can deal with NBN issues

Please let me know if you would like any clarification of the above.

Yours sincerely

LAURIE PATTON
Chief Executive Officer