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## **TELSTRA CORPORATION LIMITED**

### **Response to Design of alternative voice trials discussion paper**

**7 February 2020**



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## Introduction

This submission responds to the *Design of Alternative Voice Service Trials—request for comments and expressions of interest* paper issued by the Department of Communications and the Arts in December 2019. Our views are set out below in response to the questions posed in the paper.

### **01 Should the department be seeking to achieve other objectives through the trials? If so, how would this affect the design?**

The discussion paper states that the focus of the trial will be to test replacement services for customers on Telstra's HCRC network. Although it does not prohibit the trialling of alternatives by customers connected to the copper network, in our view HCRC should not be the focus of the trial. The trial should instead address potential alternatives to existing fixed telephony services in any area outside the NBN Fixed Line Footprint.

### **02 In terms of the deliverables for customers, do you have any concerns about the proposed design of the trials or suggestions to improve it, for example, locations for the trials, how best to recruit consumers to take part, requirements on CSPs, and service requirements?**

The focus should be on the installation, use and effectiveness of alternative services. It should allow special or bespoke customer management, and should not require that customers be managed through established, Business as Usual (BAU) processes. Implementing trial services into BAU processes would impose substantial additional costs and require substantial additional time, resulting in fewer trial services for the given funding, the need to extend the trial timeline and limiting the reach of the trial. In our view there is nothing to be gained from proving that trialled services can be managed through BAU processes in the first instance, and much to be lost in terms of a delay to the trial outcomes and unnecessary costs.

As stated above, in our view it should be open to trial participants to choose any locations within the NBN Fixed Wireless and Satellite footprints to trial alternative services.

The trial guidelines should clarify that the trial services are not required to support every currently available adjunct service of existing PSTN services such as alarms, fax, and TTY. While we recognise that ultimately the purpose of the trial is to test that USO compliant services can be provided on alternative technologies, we note that as the trial service is an addition to and not a replacement of the USO service, there are no formal timeframes associated with connection or fault repair, nor will higher service levels need to be made available for the trial.

The discussion paper contemplates that calls to the customer's existing service would be forwarded to the trial service to ensure it is used and tested. Note that in this scenario the customer's outgoing calls from the trial service would present to the call recipient with a different number (the number of the trial service), which may cause confusion for some customers. In the special case where both the trial service and the original service are provided by the same carrier, there may be solutions that allow the same number to be used for both services.

### **03 In terms of the needs of CSPs, do you have any concerns about the proposed design of the trials or suggestions to improve it, for example, information required, capping of customer numbers, timeframes, level of funding available, and the approach to**

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## payment?

The discussion paper suggests that the Department will make available to trial participants information on Telstra's voice SIOs in the NBN FW and Sat footprint. As previously noted, Telstra is not in a position to provide data on SIOs directly to other trial participants, regardless of whether there is a confidentiality undertaking.

We propose instead the development of a mechanism whereby prospective trial participants can express their interest in providing services in a defined area or areas within the trial footprint and then have the specific trial location details provided to them by the Department using a customer register of interest (see also response to Question 8 below). The Department would need to assign locations to the different participating CSPs according to an allocation process set out in the trial documents.

It should be made clear that trial funding can be used for the development of the necessary Back of House (BoH) and IT development common costs and other trial development costs, not just for the equipment and the service itself. If these other costs are not covered by the funding, it will compromise the ability of CSPs to participate.

We expect that Telstra will most likely be the existing provider for most trial customers (i.e. including those that will be provided with an alternative service by a CSP other than Telstra). To the degree that the activities of other trial participants cause the existing service provider (such as Telstra) to incur unexpected costs, those costs should be recovered from the trial funding of the participating CSPs.

It should be explicit that the trial seeks to test technical durability and quality as well as customer experience (for example how hardened is the service against lightning, and is it usable during storms?). Thought should then be given to how performance against these elements is measured and recorded.

It should also be explicit what potential role NBN can play in the trial. For example, will the trial allow NBN Fixed Wireless and Satellite services to be used to test voice capability, and if so, what support will NBN be required to provide? Will there be any restriction on NBN participating in more than one application or consortium?

## 04 Do you have suggestions on what should happen at the end of the trials, noting that Government funding will cease?

Customers who wish to continue using the trial technology for their primary voice service should be able to do so without having to pay simultaneously to maintain their original (copper or HCRC) voice service. Customers who wish to do so would need to cancel their existing voice service, and if they are Telstra copper customers would need to tell Telstra that they prefer to use the alternative service (so that Telstra is not required to maintain the copper connection under the TUSOPA).

More generally, trial participants should be able either to continue providing the trial service on a permanent basis for customers willing to pay the charge set by the provider or withdraw the service and recover any equipment provided in support of the service. These recovery costs should be explicitly covered by the program. The trial guidelines should also facilitate the customer's agreement to allow for equipment to be left in place even if the trial service is discontinued.

## 05 Do you have any comments on the stakeholder reference group? What stakeholders should be represented on the groups? Would you like to nominate anyone as a possible member?

The stakeholder reference group should include representatives from groups and organisations that represent customers in the trial area (the NBN Fixed Wireless and Satellite footprint), including for

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example the ICPA and BIRRR, and other individuals with an established role in advocating for telecommunications customers in regional and rural areas.

To the degree that the stakeholder group has a role to play in setting trial parameters, it should also include either representatives of, or a mechanism for consulting representatives of, the carriers or carrier-led consortia that are likely to be trial participants. Without such representation there is a risk of the trial being practically crippled by the imposition of well-intentioned but mis-guided parameters.

## **06 Do you have any comments regarding the criteria for assessing proposals and contracting CSPs?**

We propose that the criterion promoting HCRC replacement technology be relaxed. If HCRC replacement technology is given too much weighting it is likely to limit the degree to which the trial can deliver findings on a broad range of solutions across the other parameters proposed (location, size, geographic and demographic diversity, practical operation, new lessons learnt and enduring benefits for customers).

## **07 Do you think regular surveys of trial customers would be useful? Do you consider there are any particular matters that should be monitored and evaluated during the trials in addition to those identified (e.g. service outages, quality issues and customer turnover)?**

It will be critical to survey participating customers about the alternative services, but the frequency, method and timing of these surveys should be carefully considered. At the very least, if the survey is conducted in a centralised and consistent manner by an organisation other than the participating carrier, the participating carriers should be consulted on the specific questions and methodology of the survey in advance.

## **08 How would the trials be best promoted to rural and remote customers by both the department and CSPs? How would the results of the trials be best communicated once they are complete?**

Customers should be notified through community channels (such as ICPA, BIRRR and other members of the Regional and Rural Coalition of consumer groups hosted by ACCAN) and asked to register with the Department to participate. This register would then be used to assign individual customers to the different participating carriers.

It is important that the program allow for customers to be incentivised to participate, and that incentive costs are explicitly covered by the program.

There should be a mechanism for feedback on service performance to be provided to the participating carrier during the trial period to facilitate and promote adjustments that optimise the trial service while it is still in operation.

Once completed the detailed trial results could be provided to the Department in confidence, with individual trial service results then provided just to the relevant carrier. The Department could publish a summary of the outcomes commenting on the feasibility of replacement services without referring to individual trial technologies. This approach would address the natural concern of participants to protect their intellectual property and submit to third party assessment.