



Director,
USG Implementation
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 2154 CANBERRA ACT 2601

By email: usg@communications.gov.au

Dear Director,

RE: Alternative Voice Services Trials draft materials.

ACCAN thanks the Department of Infrastructure, Transport, Regional Development and Communications for the opportunity to comment on the next stage of development of the draft Alternative Voice Services Trials.

ACCAN supports the Alternative Voice Services Trials and the Department's approach to delivery, in particular the formation of the Stakeholder Reference Group. We offer the following comments on the Trials' draft Guidelines, Application Form, and Grant Agreement.

Preferencing consumer participants in HCRC areas

While the Trial will be run across both HCRC and copper voice footprints, we reiterate the importance of selecting applicants with a willingness to serve consumers in the HCRC area.

Avoiding 'excess usage' charges for trial services

Rather than consumer participants being liable for certain types of charges, it is more appropriate for restrictions to be placed on trial services (for example, a cap on international minutes). No consumer should be worse off, financially or otherwise, for participating in the trials. Grant applicants must be willing to transparently communicate any service restrictions to participating consumers as a condition of being accepted into the program. Any service restrictions should be limited, due to the need to test the alternative services' capacity to handle spikes in usage.

Diverting calls back to the participants' primary voice service

Criterion 1.g) of the draft Application form requires grant applicants to describe the customer supports they intend to provide. These supports should include a procedure to quickly divert incoming calls back to the participant's primary voice service in instances when the trial service experiences a fault.

Australian Communications Consumer Action Network (ACCAN)
Australia's peak body representing communications consumers

PO Box 639, Broadway NSW 2007

Tel: (02) 9288 4000 | Fax: (02) 9288 4019 | Contact us through the [National Relay Service](#)

www.accan.org.au | info@accan.org.au | [twitter: @ACCAN_AU](https://twitter.com/ACCAN_AU) | www.facebook.com/accanau

Effective data collection and frequent reporting

Criterion 1.h) requires applicants to describe how they intend to monitor the trials, including processes for sharing customer and service information. We stress the need for successful applicants to routinely gather and share detailed technical information about service performance and customer experience. This will allow the trialed service to be evaluated effectively by the Department. Monthly Progress Reports should be published publicly.

Encouraging diversity and innovation

As mentioned in our previous submission,¹ preference should be granted to applicants with smaller market share, and those with more innovative alternative voice services. We stress the importance of testing a diverse range of voice service alternatives.

Extending the trial timeframe

Given the time it will likely take to source participants, and set up and connect trial services, we are concerned that the 30 June 2021 trial end date is too soon for the trial to run effectively. Alternative voice services should be trialed for a period of 12 months once installed at the consumer's premises, so that the performance of all trial services can be measured for a consistent period of time, across all seasons and weather conditions. This would also control for extended set-up timeframes for participants in more remote areas.

Additional comments

Section 4.3 of the draft Guidelines states that applicants' proposals will be assessed in relation to perceived 'value for money', along with performance against specified criteria. We note that the Guidelines and Application form do not specifically address expectations for the quality of the trial voice service itself, or how quality would be evaluated after the trials. We stress the importance of evaluating trial voice services against established technical performance benchmarks identified in our previous submission.² The overall suitability of an alternative voice service should be determined by its quality and performance, first and foremost.

¹ ACCAN 2020, [Feedback on the Design of Alternative Voice Service Trials](#).

² Ibid.