



Mr Craig Purdon  
Project Manager  
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By email: [c\\_purdon@commsalliance.com.au](mailto:c_purdon@commsalliance.com.au)

Dear Mr Purdon,

**Comment on draft *NBN Access Transfer Code***

Thank you for your email of 30 November 2015 regarding the draft *NBN Access Transfer Code* (DR C647:2015).

The Code states that it is to be read in the context of other Codes and Guidelines, including the *Customer Authorisation* Guideline (G651:2015).

However, the Code does not appear to include a specific provision that requires that customer authorisations (CAs)<sup>1</sup> be handled in accordance with the *Customer Authorisation* Guideline.

I would therefore suggest that Communications Alliance amend the definition of customer authorisation in the Code so that it states that '*minimum requirements for customer authorisations are described in the Customer Authorisation Industry Guideline (G651:2015)*', consistent with the drafting that appears in other Codes including the:

- *Inbound Number Portability Code* (C657:2015)
- *Mobile Number Portability Code* (C570:2009)
- *Local Number Portability Code* (C540:2013)
- *Unconditioned Local Loop Service – Ordering, Provisioning and Customer Transfer* (C569:2015)

Thank you for providing us with an opportunity to comment on this Code. If you have any questions about this email, please contact Ms Natacha Doust, Adviser, Regulation and Strategy, at [natacha.doust@oaic.gov.au](mailto:natacha.doust@oaic.gov.au) or on (02) 9284 9761.

Yours sincerely

Timothy Pilgrim  
Acting Information Commissioner

16 December 2015

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<sup>1</sup> Clause 5.6.1 of the Code lists the information categories to be collected from the customer by a gaining retail service provider, however, this section does not appear to apply to customer authorisations.