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Dear Jo

**RE: Migration Assurance Policy**

Communications Alliance welcomes the opportunity to comment on the draft Migration Assurance Policy (MAP) Framework. We understand that one of the aims of the MAP is to engage the industry to develop solutions that address key migration issues to the fixed line national broadband network and that manage the service continuity needs of end users.

Recognising that nbn and Telstra (who both have been instrumental in the development of the Communications Alliance **NBN Migration Management** Guideline (G652:2014) and the **Migration of Back-to-Base Medical and Security Alarms to Fibre To The Premises (FTTP) Open Access Networks - Considerations** Industry Guidance Note (IGN 004:2014)) have been working collaboratively with the Government in developing the MAP, Communications Alliance welcomes the highly anticipated release of the MAP and the desire expressed in the MAP to maintain alignment with our publications.

Communications Alliance is generally supportive of the MAP – it is a well-structured and readable policy and supporting framework. We note that the MAP is to be a work-in-progress and updates will be required to address other access technologies within the Multi-Technology Mix (MTM), namely Fibre To The Node (FTTN) and Hybrid Fibre Coaxial (HFC). With this in mind, we would like to provide an update on the current Communications Alliance activities that will support the MAP and also share some comments that have been provided by our members when considering the Consultation Draft.

Communications Alliance also understands that individual organisations may be providing separate submissions to the Department of Communications in response to the MAP.

**Communications Alliance activities**

As you will be aware, Communications Alliance has been very active over the past 18 months in encouraging industry members to collaboratively develop guidance material to address migration issues, with the aim of providing end users with a better experience while transitioning to the NBN.

The **Copper Migration Processes and Solutions** Working Committee (WC63), responsible for the development of the **NBN Migration Management** Guideline, will be considering the MAP and any updates that may be required to the industry guideline. In addition, the Working Committee will also begin discussing and assessing the likely changes resulting from nbn's move to the MTM, and the Committee aims to have a further release of the document before the end of 2015.

The **NBN OTT Services Transition** (NOST) Working Group, responsible for the development of the medical/security alarm migration Industry Guidance Note, will be reconvened shortly to commence a revision of the Industry Guidance Note to address the appropriate communications and the roles and responsibilities of industry members involved in the new MTM access technologies. The Working Group will also be looking at incorporating guidance on other OTT services including fire alarm and lift telephone services.

#### **Four-Pillar structure and implementation**

Communications Alliance supports the four-pillar structure and the principles regarding the functional roles outlined in the MAP Framework. We note that serviceability is the key pillar that will trigger communications with end users and installation activities. Therefore it is vital that the goal is for serviceability to be available from the 'ready for service' date at all premises. If this principle is adhered to, there is less likelihood of end users expectations for timely connection to the NBN being frustrated. It will also minimise the implementation of exemptions and extensions to disconnection dates - while these actions have been used with good reason and to ensure service continuity, it creates a complex migration path for end users, Application Service Providers (ASPs) and Retail Service Providers (RSPs) to manage. It is for this reason that the importance of serviceability should be strengthened under the MAP Framework.

Communications Alliance has observed that the majority of industry stakeholders who are involved in the migration of users to the NBN are working collaboratively to perform their roles and responsibilities. Any concerns that arise from time to time are generally worked through in industry forums such as the Communications Alliance Working Committees and Working Groups, as previously mentioned.

Having said that, we recognise that there is a minority of industry stakeholders who may not be fully aware of their responsibilities. It is this part of the industry that requires further focus to educate them of their roles and responsibilities through the appropriate communications.

Communications Alliance positively notes that the MAP appears to adequately respect the principles of industry self-regulation with Government intervention via regulatory or legislative mechanisms to further reform the migration process, as mentioned in the Consultation Paper, only to be used where self-regulatory processes have not produced or are unlikely to produce satisfactory outcomes.

#### **Application Service Providers**

Participants in our Working Committees/Groups have drawn attention to the fact that the Department has taken the opportunity to identify additional obligations for ASPs and end users currently not contained in the Communications Alliance publications. For vulnerable end users especially, there may be a heavy reliance on ASPs to fully understand their responsibilities so that communication to these vulnerable end users is accurate, targeted and consistent, and that they are communicated as early as possible during the migration window.

In addition, Communications Alliance wishes to highlight that unmonitored personal medical alarms, estimated to exist in 70,000 to 100,000 user premises (which represents approximately 25% of the installed monitored/unmonitored personal medical alarm base) do not appear to be covered by the MAP. Specifically, the MAP is silent on the inherent differences between the responsibilities of ASPs and end users when comparing the use of monitored and unmonitored personal medical alarms. There is also a need for appropriate communications and education for end users of unmonitored personal alarms at an early stage during the migration window as these users do not typically have relationships with ASPs and ready access to appropriate information.

With respect to security alarms, there are an estimated 1.5 million back-to-base connected security systems that require an end-to-end migration process (in comparison to about 350,000 personal medical alarms). Some of these security systems can be installed for the needs of vulnerable users, including break and entry, holdup alarms, duress, request for assistance including for domestic violence and AVOs. We believe equal attention is warranted for security systems that can be used to address the safety risks of vulnerable end users. The following additions to the MAP are offered for consideration:

- Migration Assurance Policy Statement. Page 4:  
To include 'security systems' to the existing list of critical over-the-top legacy services.
- Migration Assurance Policy Framework. Section 2.2.1 'Migration of over-the-top legacy services'. Page 13:  
In addition to the two existing references for 'medical alarms' and 'fire alarms and lift phones', a third new reference to be added for 'security systems' with an accompanying page reference.
- Migration Assurance Policy Framework. In either Section 3.2.1 'Tier one vulnerable end users' (Page 19) or Section 3.2.2 'Tier two vulnerable end users' (Page 22), as appropriate:  
Additional information to be added for security systems.
- Migration Assurance Policy Framework. Section 3.3 'Management of safety critical services (fire alarm panels and lift phones)'. Page 27:  
Additional information for security system providers in the existing paragraph on 'peak fire alarm and lift phone bodies'.

### **The cabling industry**

Communications Alliance recognises that the greatly increased numbers of end users migrating to the NBN highlights an important need for appropriate communications when end users are considering their cabling needs and options within their premises.

End users need to have a greater awareness of where they can source information for the technical and regulatory aspects of cabling. The International Copper Association Australia and the five cabling registrars (the Fire Protection Association (FPA) Australia, the National Electrical and Communications Association (NECA), Telecommunications Industry Training Advisory Board (TITAB) Australia, BICSI Registered Cablers Australia (BRCA) and the Australian Security Industry Association Limited (ASIAL)) have developed the 'Australian Registered Cablers' website at [www.registeredcablers.com.au](http://www.registeredcablers.com.au) which provides information for householders, businesses, cablers and RSPs that assist with addressing this issue.

### **Timing aspects of the rollout**

Communications Alliance suggests that the incentive for both consumers and businesses to migrate early during their migration window is not sufficiently clear in the MAP. Consumers may not realise the potential impacts of delay or may be waiting to see if better offers appear in the market. For those consumers who are satisfied with their existing telecommunications service, there will not be a tendency to act until the threat of disconnection is imminent. Business customers may require a period of time to secure capital expenditure sign off. Consideration needs to be given to more targeted communications. Additionally, incentives to migrate early need to be considered. RSPs and ASPs are in general not able to offer additional incentives simply due to the cost incurred in migration. It may be necessary for nbn to give this some consideration.

Another complication for the industry relates to the progressive rollout of the MTM access technologies and the impact on the design and implementation of solutions by RSPs and ASPs. A case in point is the provision of user Network Termination Devices (NTDs) and the provision of battery backup, which are dependent on the type of access technology. The MAP will need to take this into consideration.

Finally, access technology design limitations will need to be taken into account for various scenarios. If a wireless solution is being considered for a user of personal medical alarm, the availability of a wireless network at that location is of course a necessity. There will be instances of wireless blackspots with the NBN fixed line footprint and in these scenarios, the appropriate solutions for these types of users will need to be developed.

We look forward to engaging with you further on this matter. If you wish to follow up on any aspects of our response, please contact Craig Purdon on (02) 9959 9124.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton', written in a cursive style.

John Stanton  
**Chief Executive Officer**