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Dear Craig,

Review of C647:2017 NBN Access Transfer

nbn welcomes the opportunity to comment on the scheduled review of *C647:2017 NBN Access Transfer Industry Code (Access Transfers Code)*.

The Access Transfers Code, which was developed by industry through Working Committee 53, has contributed to the development of an effective transfer process for end users on the **nbn** network. It has established a standard process for transferring end users between RSPs – enabling end users to interact only with their preferred gaining service provider in order to transfer their existing **nbn** connection from a losing service provider.

Meeting the needs of industry

In **nbn**'s view, the Access Transfers Code has been a successful demonstration of industry co-regulation. Together, **nbn** and RSPs have established an efficient process that minimises service interruption and supports the important objective of service continuity.

The key roles of **nbn** in this process are:

- supplying relevant location and network information via **nbn's service qualification system** (including EPID of current access seeker);
- processing **access transfer** and **transfer reversal** orders submitted by losing and gaining access seekers; and
- **notifying losing access seekers** of a successful access transfer.

Importantly, **nbn**'s systems and processes have been developed to enable the logical transfer of a service (between losing and gaining access seeker) to occur almost immediately.

As **nbn** does not have the direct relationship with end users, it is reliant on access seekers ensuring that transfers and reversal orders are only submitted in accordance with the Access Transfers Code. **nbn** is also reliant on access seekers identifying any issues that may be impacting end users. As a result of these interactions with access seekers, and recent WC53 meetings, **nbn** is aware of two potential elements of the transfer and reversal process that may warrant consideration as part of the Access Transfers Code review.



Potential areas for process improvement

Based on **nbn**'s experience in the access transfers process, and involvement in WC53, the following 2 aspects of the access transfer process could benefit from the proposed Code review:

1. Complex business transfers

The Access Transfers Code was designed by industry with residential end users as the primary focus and has been successful in providing a scalable solution for managing consumer grade transfers. One area of complexity that WC53 is currently focusing on is transfers occurring at complex business and enterprise locations that may be served by multiple lines. **nbn** requested that WC53 reconvene to focus on this issue and continues to invest significant effort to help industry work toward the right outcome for service providers and end users. To the extent that industry identifies different and enhanced solutions for supporting these transfers it is appropriate that the Code is updated accordingly.

2. Contact list

Where a losing service provider identifies that their service should not have been disconnected, the Access Transfers Code provides for engagement between the gaining and losing access seeker to validate whether a transfer was invalid and if a reversal is required. Historically there have been instances where an access seeker's contact details are not made available via the Comms Alliance contact list to support this interaction. It would be beneficial if the Code review considered avenues for ensuring the Contact list remains up to date – and whether the Contact list sufficiently deals with scenarios where the RSP is downstream of the access seeker.

Proposed Review

Notwithstanding the success of the Access Transfers Code to date, **nbn** supports the proposed review of the Code. While the majority of end users are benefiting from the established process, it is important that industry continually monitors the effectiveness of this process, identifies areas that could benefit from increased focus or clarity, and develops solutions accordingly.

Yours sincerely

Jennifer Crichton
Executive General Manager, Head of Regulatory