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Submission 13th January 2023

Craig Purdon
Project Manager
Communications Alliance
Level 12/75 Miller Street
North Sydney
NSW 2060

Re: DR C647:2022 NBN Access Transfer Code

Dear Mr Purdon,

The Australian Communications Consumer Action Network (ACCAN) thanks Communications Alliance for the opportunity to provide feedback on DR C647:2022 NBN Access Transfer Code (draft code).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

ACCAN supports the proposed amendments to the draft code, which will facilitate the efficient transfer of NBN services. Providing Access Virtual Circuit IDs to consumers will support the verification and transfer process and provide benefits by:

- reducing the incidence of incorrect or unauthorised transfers of NBN services;
- reducing the disruption associated with the transfer of NBN services;
- enhancing competition by reducing the indirect costs of switching NBN services;
- promoting the timely and efficient transfer of NBN services.

ACCAN once again thanks Communications Alliance for the opportunity to comment on the draft code. If you have any further questions regarding our response, please do not hesitate to contact me at 02 9288 4000.

Your sincerely,

Gareth Downing
Deputy Chief Executive Officer

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.