

**COMMUNICATIONS
ALLIANCE LTD**



INDUSTRY GUIDELINE

G662:2021

**NBN ACCESS TRANSFER – TRANSFER VALIDATION
TRIAL**

G662:2021 NBN Access Transfer – Transfer Validation Trial Industry Guideline

First published as G662:2020
Second version as G662:2021

Communications Alliance Ltd was formed in 1997 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

Disclaimers

1. Despite anything contained in this Guideline:
 - (a) Communications Alliance disclaims responsibility (including where Communications Alliance or any of its officers, employees, agents or contractors has been negligent) for any direct, indirect or consequential loss, damage, claim, or liability any person may incur as a result of any:
 - (i) reliance on or compliance with this Guideline;
 - (ii) inaccuracy or inappropriateness of this Guideline; or
 - (iii) inconsistency of this Guideline with any law, Industry Code or Industry Guideline; and
 - (b) Communications Alliance disclaims responsibility (including where Communications Alliance or any of its officers, employees, agents or contractors has been negligent) for ensuring compliance by any person with this Guideline.
2. For avoidance of doubt:
 - (a) You must not rely on the information in this document as an alternative to legal advice from your solicitor or other professional legal services provider.
 - (b) You should never delay seeking legal advice, disregard legal advice, or commence or discontinue any legal action because of information in this document.
3. These disclaimers will not apply to the extent they are inconsistent with any relevant legislation.

Copyright

© Communications Alliance Ltd 2021

This document is copyright and must not be used except as permitted below or under the Copyright Act 1968. You may reproduce and publish this document in whole or in part for your or your organisation's own personal or internal compliance, educational or non-commercial purposes. You must not alter or amend this document in any way. You must not reproduce or publish this document for commercial gain without the prior written consent of Communications Alliance. Organisations wishing to reproduce or publish this document for commercial gain (i.e. for distribution to subscribers to an information service) should apply to Communications Alliance by contacting the Communications Alliance Commercial Manager at info@commsalliance.com.au.

TABLE OF CONTENTS

| | | |
|-------------------------------|---|-----------|
| INTRODUCTORY STATEMENT | | 2 |
| 1 | GENERAL | 3 |
| | 1.1 Introduction | 3 |
| | 1.2 Scope | 3 |
| | 1.3 Guideline review | 4 |
| 2 | ACRONYMS, DEFINITIONS AND INTERPRETATIONS | 5 |
| | 2.1 Acronyms | 5 |
| | 2.2 Definitions | 5 |
| | 2.3 Interpretations | 10 |
| 3 | PRIVACY AND USE OF CRITICAL SERVICE FLAGGED SERVICES LIST | 11 |
| | 3.1 Flagged Services List and information shared as a result of the Trial process | 11 |
| | 3.2 Timeframes in this Guideline | 11 |
| | 3.3 Escalation Process | 12 |
| 4 | TRIAL OVERVIEW | 12 |
| | 4.1 Trial Notifications | 12 |
| | 4.2 Trial Transfer Process | 13 |
| | 4.3 Flagged Services Removal Process | 14 |
| | 4.4 Flagged Services List Management | 15 |
| 5 | TRIAL SUCCESS CRITERIA | 16 |
| 6 | REFERENCES | 19 |
| APPENDIX | | 20 |
| A | TRIAL FLAGGED SERVICE AND TRANSFER PROCESS FLOW | 20 |
| B | ACCESS SEEKER TRANSFER VALIDATION TRIAL CONTACT LIST | 21 |
| PARTICIPANTS | | 22 |

INTRODUCTORY STATEMENT

The effective, efficient and accurate transfer of an active NBN Service between Access Seekers is paramount to providing consumer choice and competition on the National Broadband Network. In a small number of cases, incorrect transfers have occurred which have resulted in a loss of service for a Customer. This is an unintended outcome of the NBN Access Transfer Industry Code (C647:2017) (the Code). Where these services are relied upon by organisations offering Critical Services to the community, industry believes it is paramount to minimise disruptions to Critical Services should an incorrect Transfer be requested.

The development of this Guideline has been facilitated by Communications Alliance through a Working Committee (WC53) comprising representatives from the telecommunications industry and regulatory agency representatives.

WC53 has developed a Trial process that may be used to ensure an additional layer of protection for Critical Services. This process will be trialed amongst participating Access Seekers, and NBN Co, using the additional steps outlined in this Guideline to reduce the chances of invalid transfers for Critical Services.

To the greatest extent possible, this Guideline has been developed as a supplement to the Code for Transfers conducted for a specified range of Customers and therefore, for all other Transfers, the existing Code processes should continue to be used.

It is acknowledged that not all Access Seekers or RSPs may choose to participate in the provision of a Flagged Services List to NBN Co; or may not provide NBN Services to Customers operating Critical Services.

2021 Revision

In 2021 a revision to the Guideline was undertaken to include additional protections for services which may be disrupted due to multiple service transfers. These include High Risk Services and Impacted Services that have been impacted by a Subsequent Reversal or Subsequent Transfer and are being protected from further attempts to be Transferred unless correct validation has occurred.

1 GENERAL

1.1 Introduction

- 1.1.1 The development of the G662:2020 NBN Access Transfer – Transfer Validation Trial Industry Guideline (the Guideline) has been facilitated by Communications Alliance through a working committee comprising representatives from the telecommunications industry and Government regulatory agencies.
- 1.1.2 This Guideline should be read in conjunction with related Industry Codes and Industry Guidelines, including:
 - (a) the Telecommunications Consumer Protections (TCP) Code (C628:2019);
 - (b) the Local Number Portability Code (C540:2013) Incorporating Variation No.1/2016;
 - (c) the NBN Access Transfer Code (C647:2017); and
 - (d) the Customer Authorisation Guideline (G651:2017).
- 1.1.3 This Guideline should be read in conjunction with related legislation and documents including:
 - (a) the *Telecommunications Act 1997 (Cth)* (Act);
 - (b) the *Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth)*;
 - (c) the *Competition and Consumer Act 2010 (Cth)*;
 - (d) the *Privacy Act 1988 (Cth)*;
 - (e) NBN Co's Wholesale Broadband Agreement;
 - (f) NBN Co's Special Access Undertaking, accepted by the ACCC in December 2013.

1.2 Scope

- 1.2.1 The Guideline applies to the Carriage Service Providers section of the telecommunications industry under section 110 of the Act.
- 1.2.2 It deals with the following telecommunications activities as defined in section 109 of the Act:
 - (a) carrying on business as a Carrier; or
 - (b) carrying on business activities as a Carriage Service Provider; or
 - (c) supplying goods or service(s) for use in connection with the supply of a Listed Carriage Service.
- 1.2.3 In line with the terms of reference of WC53, this Guideline specifically relates to:

- (a) participating Access Seekers who are the RSP for a Customer that provides one or more Critical Services to the community and wish to provide a Flagged Services List to NBN Co for that Critical Service (s) for the purposes of this Trial;
 - (b) RSPs acting as a Gaining Access Seeker; and
 - (c) RSPs acting as a Losing Access Seeker.
- 1.2.4 Transfers for Residential Customers are excluded from this Trial process, other than those who are subject to High Risk and Subsequent Reversal / Subsequent Transfers.
- 1.2.5 NBN Co will provide support for the Trial process by making amendments to its Wholesale Broadband Agreement to advise Access Seekers of the Trial process and the new Transfer Trial Reject Reason.

1.3 Guideline review

- 1.3.1 The Guideline will be reviewed on a quarterly basis by Working Committee 53.
- 1.3.2 NBN Co will provide reporting data as part of the review process, including:
- volumes of flagged and rejected orders; and
 - volumes of services on the register.

2 ACRONYMS, DEFINITIONS AND INTERPRETATIONS

2.1 Acronyms

For the purposes of the Guideline:

AVC

means Access Virtual Circuit

CA

means Customer Authorisation

EPID

means Eligible Party Identification

FTTB/N

means Fibre to the Building or Fibre to the Node

FTTC

means Fibre to the Curb

FTTP

means Fibre to the Premises

FW

means Fixed Wireless

HFC

means Hybrid Fibre-Coaxial

NBN

means National Broadband Network

RSP

means Retail Service Provider

UNI

means User Network Interface

WC

means Working Committee

2.2 Definitions

For the purposes of the Guideline:

Access Provider

means a Carrier or Carriage Service Provider who supplies declared services to itself or other persons under Part XIC of the Competition and Consumer Act 2010 (Cth). For avoidance of doubt, NBN Co is the only Access Provider in the context of this Guideline.

Access Seeker

means the party requesting services direct from an Access Provider and has the meaning set out in Section 152AG of the *Competition and Consumer Act 2010 (Cth)*.

Act

means the *Telecommunications Act 1997 (Cth)*.

Business Day

means a day commencing at 8.00 am and ending at 5.00 pm, other than:

- (a) a Saturday or Sunday; or
- (b) a day which is a public holiday in the place where work is required.

Business Hours

means the hours commencing at 8.00 am and ending at 5.00 pm on any Business Day.

Carriage Service Provider

has the meaning given by section 7 (Definitions) of the Act.

Carrier

has the meaning given by section 7 (Definitions) of the Act.

Code

means the industry code NBN Access Transfer Code (C647:2017).

Critical Service

means an NBN Service that is provided by an RSP to an organisation that uses that NBN Service for the purpose of fulfilling an essential community function and for which harm or detriment may be created to communities or individuals if the NBN Service becomes not operational due to an incorrect transfer.

NOTE: Critical Services may include but are not limited to NBN Services provided to:

- *Fire Stations, including those in rural/ regional areas or a volunteer centres.*
- *Ambulance Stations*
- *Police Stations*
- *Emergency Management Facilities, e.g. 000, 112, 106 response centres*
- *Hospitals*
- *Defence Forces*
- *Personal Emergency Services*
- *LifeLine*

- *State Emergency Service*
- *Crisis Line*
- *Poisons Information*
- *Kids Helpline*
- *Rural / Regional Dr Surgeries (1st point of call for an emergency)*
- *Critical Response Role - 1st point of contact in life threatening situations*
- *Hotlines to mining sites / SES*
- *24 Hour Medical clinics / surgeries*
- *Organisations that may need to be reached during natural disasters or in emergency situations.*
- *Public aged care homes*

Customer

is the end user or the end user's authorised agent or representative, in whose name the account is established, or will be established, with the Gaining Access Seeker for the supply of products or services for which the Gaining Access Seeker requires the NBN service.

Customer Authorisation

means a written or electronic authorisation which is executed by or on behalf of a Customer for the purpose of authorising a Transfer, containing the minimum mandatory requirements specified in section 4.1 of the Code.

Cutover

means the action taken by the Access Provider and, where relevant, installation technicians to complete the Transfer Request.

Eligible Party Identification

means an alpha or numeric code as allocated and stored in the EPID List on the Communications Alliance website.

Enhanced Service Qualification

is a process requested by the Access Seeker as described in section 6 of the Code.

Flagged Service

means an NBN Service on a Flagged Services List.

Flagged Services List

means a list of NBN Services provided to NBN Co via a CSV file that NBN Co will use to flag within its provisioning system a Critical Service, High Risk, or Subsequent Reversal is in use over that service.

Fixed Wireless

means a wireless network that is owned or controlled by an Access Provider.

Gaining Access Seeker

means the Carrier/Carriage Service Provider who is acquiring the NEBS product from NBN Co that is used to supply the Customer with an NBN service. A Gaining Access Seeker may also be the Gaining RSP.

Gaining RSP

means the RSP who is supplying the new NBN Service directly to the Customer. A Gaining RSP may also be the Gaining Access Seeker.

High Risk Service

means an NBN Service provided by an RSP to an enterprise organisation or a residential priority assistance service for which disproportionate harm or detriment will result to the customer, communities or individuals if the NBN Service becomes nonoperational due to an Invalid Request.

Impacted Service

means an NBN Service which has completed the Transfer and Reversal process (or where a Transfer has been used instead of a Reversal to recover a service).

Invalid Request

means a Transfer Request which:

- (a) resulted from a processing error;
- (b) was made without the authorisation of the Customer; or
- (c) is the result of a Customer rescinding or cancelling a Transfer Request within the cooling off period in accordance with the applicable fair-trading legislation.

Losing RSP

means the RSP that supplied the Customer with their NBN Service immediately prior to the Transfer Request. The Losing RSP may also be the Losing Access Seeker.

Losing Access Seeker

means the Access Seeker that supplied the Customer with their NBN Service immediately prior to the Transfer Request. A Losing Access Seeker may also be the Losing RSP.

NBN Service

means an access service supplied by NBN Co to an Access Seeker over FTTP, FTTB, FTTC, FTTN, HFC, Satellite, Fixed Wireless or other wireless infrastructure via virtual circuits, supporting a variety of speeds and traffic classes to one or more UNIs.

Rejected Transfer

means a Transfer that has been rejected on the basis that the NBN Service has been listed by the Losing Access Seeker and is currently flagged within NBN Co's systems as being a Critical Service.

Residential Customer

means a Customer that is an individual who acquires an NBN Service for the primary purpose of personal or domestic use, and not for resale, under the standard terms and pricing for residential, non-business Customers set out in the Access Seekers Standard Form of Agreement.

Retail Service Provider

is the party supplying services direct to the Customer. In some cases, the RSP will also be the Access Seeker.

Reversal

means a request from a losing Access Seeker to an Access Provider for a reversal of a Transfer to reinstate the same or similar products or services provided over the NBN prior to the Invalid Request. Reversed and Reverse have corresponding meanings.

Reversal Period

means a period of 5 Business Days from the date of Transfer completion.

Satellite

means the satellite network that is owned or controlled by an Access Provider.

Service Qualification

is a process requested by the Access Seeker as described in section 6 of the Code.

Standard Form of Agreement

has the meaning given in the Act.

Subsequent Reversal / Subsequent Transfer

means an Impacted Service that has been transferred and reversed, or transferred back to the original RSP, and therefore can be placed on an RSP's Flagged Services List in order to be protected from a subsequent attempt to be Transferred prior to further confirmation the correct service has been requested.

Transfer

means the activity required to complete a Transfer Request.

Transfer Request

means a request from an Access Seeker to an Access Provider for a transfer of an NBN Service to itself.

Trial

means the period of time to assess the transactions between Access Seekers and NBN Co that involve Critical Services, High Risk Services or Subsequent Reversals included on an Access Seeker's Flagged Services List and the associated processes covered by the Guideline.

Trial Reject Reason

means the information provided in a Reject Advice that is sent to the Gaining Access Seeker as a result of an NBN Service being included in a Flagged Services List. The Trial Reject Reason will include the text "This service is flagged in the Communications Alliance Transfer Validation Trial and must be removed by the Losing Access Seeker before a Transfer Order can be accepted by NBN Co."

2.3 Interpretations

In the Guideline, unless the contrary appears:

- (a) headings are for convenience only and do not affect interpretation;
- (b) a reference to a statute, ordinance, code or other law includes regulations and other instruments under it and consolidation, amendments, re-enactments or replacements of any of them;
- (c) words in the singular includes the plural and vice versa;
- (d) words importing persons include a body whether corporate, politic or otherwise;
- (e) where a word or phrase is defined, its other grammatical forms have a corresponding meaning;
- (f) mentioning anything after include, includes or including does not limit what else might be included;
- (g) words and expressions which are not defined have the meanings given to them by the Act; and
- (h) a reference to a person includes a reference to the person's executors, administrators, successors, agents, assignees and novatees.

3 PRIVACY AND USE OF FLAGGED SERVICES LIST

A Carrier or Carriage Service Provider who receives any type of information as described in this Guideline should use this information only in accordance with Part 13 of the Act and the *Privacy Act 1988*.

Where there is any inconsistency between the Guideline and Part 13 of the Act or the *Privacy Act 1988*, Part 13 of the Act or the *Privacy Act 1988* (as the case may be) prevails.

3.1 Flagged Services List and information shared as a result of the Trial process

3.1.1 For the purposes of the Transfer of an NBN Service on the Flagged Services List and information shared as a result of the Trial processes, an Access Provider, Access Seeker or RSP must:

- (a) ensure that the identification of Flagged Services is protected from unauthorised use or disclosure; and
- (b) only use the information in accordance with transactions that are provided between Access Providers, Access Seekers and RSPs and that are also subject to the terms under the Guideline, such as:
 - (i) Transfers, confirmation the correct Customer has been subject to the Transfer and/or Reversals, customer and network fault management and complaint handling, but should not be used for any other purposes. Any other purposes include but are not limited to marketing purposes.

3.1.2 All other privacy conditions specified in the Code and section 4 of this Guideline, should be adhered to when transferring NBN Services that are used for Critical Services, High Risk Services or Subsequent Reversals, including interactions between RSPs and Access Seekers for the purposes of confirming the correct Customer has been the subject a Transfer that has received a Trial Reject Reason.

3.2 Timeframes in this Guideline

The timeframes captured in this Guideline are expected maximum timeframes.

3.2.1 The extension of the trial to also include High Risk and Subsequent Reversal / Subsequent Transfers will commence from 1st September 2021.

3.2.2 The Trial process, Flagged Services List management process and reporting will continue until such time as the Communications Alliance WC 53 determine the Trial should be discontinued. The WC will undertake reviews against the success criteria (section 5) every 3 months.

3.3 Escalation Process

Where a party needs to escalate a matter in relation to the Guideline it should be escalated via the contact list maintained by Communications Alliance in accordance with Appendix B.

NOTE: Where a Losing Access Seekers contact details are not available via the contact list or no response is received from the Losing Access Seeker, then a Gaining Access Seeker may contact NBN Co directly. NBN Co can then engage the Losing Access Seeker (or upstream Access Seeker) to assist.

4 TRIAL OVERVIEW

4.1 Trial Notifications

General Trial Principles

- 4.1.1 To the greatest extent possible, all parties are to continue to use existing processes, transactions and interface requirements pertaining to Transfers together with the process outlined in this Guideline for the managing of Flagged Services Lists and Transfers for Critical Services, High Risk Services or Subsequent Reversals.

NOTE: Existing processes include but are not limited to all other processes and transactions in the Code associated with Customer Authorisation (CA), Service Qualification, Transfer Cutover activity, managing Disputed Rejects, Invalid Requests and Reversals, including for NBN Services that fall outside the scope of the Guideline.

- 4.1.2 It is expected that all Access Seekers and RSPs may receive the Trial Reject Reason [RJ005206] as a result of the relevant NBN Service having been flagged in the Losing Access Seeker's Flagged Services List.
- 4.1.3 Access Seekers and RSPs who have downstream service providers should ensure Customers of those providers also have the ability to participate in the processes outlined in the Guideline, even where activities do not involve the Access Seeker.

Steps for Notification of a Flagged Service

- 4.1.4 The Gaining Access Seeker will be notified of the Flagged Services on receipt of the Trial Reject Reason from NBN Co.
- 4.1.5 The Losing Access Seeker will cooperate with a Gaining Access Seeker's request to remove a Flagged Service from their Flagged Services List upon request once it has been confirmed (as per clause 4.3.2 or clause 4.3.4) that the CA is valid and the Transfer Request for a Critical Service should proceed.
- 4.1.6 To assist with determining the validity of the Transfer Request, the Gaining Access Seeker must also provide the LOC ID, NTD ID, UNI-D and Customer Name and where applicable the

Authorised Representative name as part of the request to remove the Flagged Service from the Flagged Services List.

NOTE: For FTTP/HFC/FW/Satellite – Location ID, NTD ID (e.g. NTD000012345678), UNI-D (port number e.g. 1), Customer Name

•For FTTN/FTTB/FTTC – Location ID, NTD ID (blank as not applicable), UNI-D (copper pair id, e.g. CPI100000012345), Customer Name

For all services – the type of service, the function of the service and the FNN may also assist in identification.

- 4.1.7 The Losing Access Seeker may where required contact the Customer to confirm validity of the CA, however this activity must only be used to validate if a CA was provided to the Gaining Access Seeker and must not be used as an opportunity to win back the Customer in the event the CA is valid.

4.2 Trial Transfer Process

- 4.2.1 A Gaining Access Seeker will commence the Transfer process as set out in section 7.3 (Transfer Process) of the Code.
- 4.2.2 Validate Transfer Request: The Access Provider will validate the Transfer Request against an additional flag within its systems to test whether the NBN Service has been flagged by the Losing Access Seeker as a Critical Service, High Risk Service or Subsequent Reversal / Subsequent Transfer.
- 4.2.3 Provide Trial reject Reason: The Access Provider must provide the following information to the Gaining Access Seeker in a Trial Reject Reason, as a minimum:
- (a) the Access Seeker Request ID;
 - (b) the date that the validation was performed; and
 - (c) the Trial Reject Reason which will indicate that the NBN Service is a Flagged Service and therefore further liaison with the Losing Access Seeker is required to validate a CA and potentially remove the Flagged Service from the Flagged Service List before another Transfer Request can be initiated for that NBN Service.
- 4.2.4 CA validation: once the Trial Reject Reason has been received, the Gaining RSP is responsible for:
- (a) taking steps to validate a CA with the Losing Access Seeker to determine the correct Customer has been subject to the Transfer Request; or
 - (b) undertaking further investigation, where necessary, to clarify with their Customer or potential Customer that the correct NBN Service details have been used for the Transfer Request; or
 - (c) determine if connection of a parallel service may be preferable to transfer;

prior to attempting another Transfer Request for the same NBN Service.

- 4.2.5 Contact the Losing Access Seeker to remove the Flagged Service from the Flagged Service List: on determining the correct Customer details have been provided in the original Transfer Request for a Flagged Service, the Gaining Access Seeker or RSP may:
- (a) use the Enhanced Service Qualification to obtain the Losing Access Seeker or RSP Eligible Party Identification Code to ascertain the correct contact needed to request a service be removed from the Losing Access Seeker's Flagged Services List; and
 - (b) use the Transfer Contact List (see Appendix B) required under the Code to contact the relevant Losing Access Seeker to request the Flagged Service be removed from their Flagged Services List.

NOTE: The Gaining Access Seeker may choose to take alternative actions to requesting the Losing Access Seeker to remove the Flagged Service from their Flagged Services List, (such as) initiating a new connection with a corrected set of Transfer Request details.

4.3 Flagged Services Removal Process

- 4.3.1 If the Gaining Access Seeker contacts the Losing Access Seeker to request an NBN Flagged Service be removed from the Losing Access Seeker's Flagged Services List, the Losing Access Seeker may request a copy of the CA to confirm the correct Customer is the subject of the Transfer Request.
- 4.3.2 Where the Losing Access Seeker is not the RSP, the Losing Access Seeker should liaise with its downstream RSP to have the CA details validated for the request received in clause 4.3.1.
- 4.3.3 A downstream RSP should reply to a Losing Access Seekers request for CA validation as per clause 4.3.2 within 2 Business Days.
- 4.3.4 Upon receipt of a valid CA, the Losing Access Seeker should validate within 2 Business Days and either:
- (a) remove the Flagged Service from their Flagged Services List via the Service Portal and advise the Gaining Access Seeker this activity has been completed; or
 - (b) reject the request.
- 4.3.5 On validation that the rejected Transfer was requested for the correct Customer and correct service, the Losing Access Seeker must remove the Service record from the Flagged Services List provided to NBN Co. This can be requested in near real-time.
- 4.3.6 If the Losing Access Seeker rejects the request, it should provide a reject reason to the Gaining Access Seeker using

the agreed contact method outlined on the Transfer Contact List. Valid reject reasons may include (but are not limited to):

- (a) Customer details are incorrect;
- (b) invalid Address;
- (c) service not active;
- (d) CA is invalid;
- (e) Customer rejects CA.
- (f) incorrect service selected (where more than one active service exists at the location); and
- (g) Parallel service is required

4.3.7 Where the flagged service removal request is subject to a dispute between the Access Seekers, the parties must adhere to the principles of conduct outlined in the Code.

4.3.8 Where a Subsequent Reversal is placed on the Flagged Services List, it should be removed prior to 28 calendar days elapsing from the date it was originally placed on the Flagged Services List.

4.4 Flagged Services List Management

4.4.1 Access Seekers may upload its Flagged Services List in a file to NBN Co.

4.4.2 The Flagged Services List file will be provided in a CSV file for format via the Service Portal.

The File format will include Simple format: LOCATION_ID, AVC_ID or PRI, TYPE (text string), ACTION (Either ADD or REMOVE).

The type field will be populated by a high-level category – 'Critical' (Community, Essential, Emergency), 'High Risk' or 'Subsequent Reversal / Subsequent Transfer'.

NOTE: Access Seekers should not include additional information into the type field text string, such as personal information relevant to the user of a High Risk Service.

4.4.3 NBN Co will use this data to load a RSP Critical Service, High Risk Service or Subsequent Reversal flag into the systems for the relevant service(s) and either create a new, or modify an existing, record status. LOCATION_ID and AVC_ID or PRI must match records NBN Co has already associated with that Access Seeker or the record will be rejected. NBN Co will use the details to verify a Trial Reject Reason if the NBN Service is active on a Losing Access Seeker's Flagged Services List.

4.4.4 Access Seekers will only be provided with visibility of the records they have loaded into the database in relation to their own services uploaded to the Flagged Services List.

- 4.4.5 Access Seekers may assign administration rights to users within their respective organisations for the Flagged Services List. This will be restricted to only viewing or modifying the Access Seeker's own records in the database.
- 4.4.6 Flagged Services List records can be updated in near real time from an Access Seeker's upload of updated or new records.
- 4.4.7 An Access Seeker can create, remove or modify a Flagged Service record at any time upon request from the Gaining Access Seeker or RSP.

NOTES: 1. There is no expiry or automatic removal of a Flagged Service on a Flagged Service List within NBN Co's systems. An Access Seeker may manage additions or removals to one Flagged Service, or all of its Flagged Services List as required. Until such time as the Trial period is determined to be finalised, Flagged Services will continue to be flagged as a rejected Transfer until the Access Seeker removes the NBN Service from the list. If WC53 considers the Trial is to be concluded or discontinued, each Access Seeker must remove their entire Flagged Services List through their own Flagged Service removal processes.

2. Where the Flagged Service was identified as a Subsequent Reversal this should be removed within 28 calendar days of it being added to the Flagged Services List by the Access Seeker.

- 4.4.8 If a Flagged Service is disconnected and subsequently reconnected by the relevant Access Seeker, this will effectively remove the service from the Flagged Services List as a new AVC or PRI will be allocated by NBN Co for the reconnected service.

NOTE: The Access Seeker must upload a new corresponding record into the Flagged Services List if the Flagged Service is disconnected and subsequently reconnected.

- 4.4.9 Access Seekers will have the ability to view or extract their entire Flagged Service List via the interface.
- 4.4.10 Reports for Access Seekers - Success reports and error messages will be generated by NBN Co to indicate a records submission status. All history and activity in the database will be auditable by NBN Co. e.g. date time for records added, removed and agent logins for each activity.

5 TRIAL SUCCESS CRITERIA

- 5.1.1 NBN Co will report the following information (aggregated so as not to identify any individual Access Seeker or RSP) to WC 53 on an as required basis:
 - (a) volume of Flagged Services.
 - (b) number of total Transfer Requests rejected with the Trial Reject Reason.
 - (c) The volume of Flagged Services where:

- (i) the Flagged Service was subsequently removed from the Flagged Services List and
 - i. a Transfer subsequently proceeded for the NBN Service; or
 - ii. no further transactions took place at the location; or
 - iii. an alternate service at the location was transferred; or
 - iv. a parallel service was connected
- (ii) the Flagged Service was not removed from the Flagged Services List and;
 - i. no further transactions took place at the location; or
 - ii. an alternate NBN Service at the location was Transferred; or
 - iii. a parallel service was connected
- (iii) the Flagged Service was not removed from the Flagged Services List prior to 28 calendar days, where the Flagged Service was identified as a Subsequent Reversal.

5.1.2 WC 53 will meet and review on a quarterly basis:

- (a) whether industry complaints have reduced in relation to loss of service to Critical Services, High Risk Services or Subsequent Reversals due to invalid or incorrect Transfers;
- (b) whether the number of Transfer Requests rejected with the reason code [RJ005206] indicates there are a sufficient number of Access Seekers who have successfully implemented the Trial process;
- (c) the number of subsequent successful Transfers that have been implemented once the Trial is completed;
- (d) the criteria for Flagged Services and whether the list of eligible Customers or Carriage Services should be expanded;
- (e) the number of Flagged Services List amendment requests and rejects;
- (f) the number of Customer requests/escalations; and
- (g) whether the additional protection anticipated in implementing an additional validation step prior to the Transfer of Flagged Services has been effective.

5.1.3 At the review sessions, if the Trial results show that the number of issues has reduced significantly when transferring Critical Services, High Risk or Subsequent Reversals, WC 53 can decide

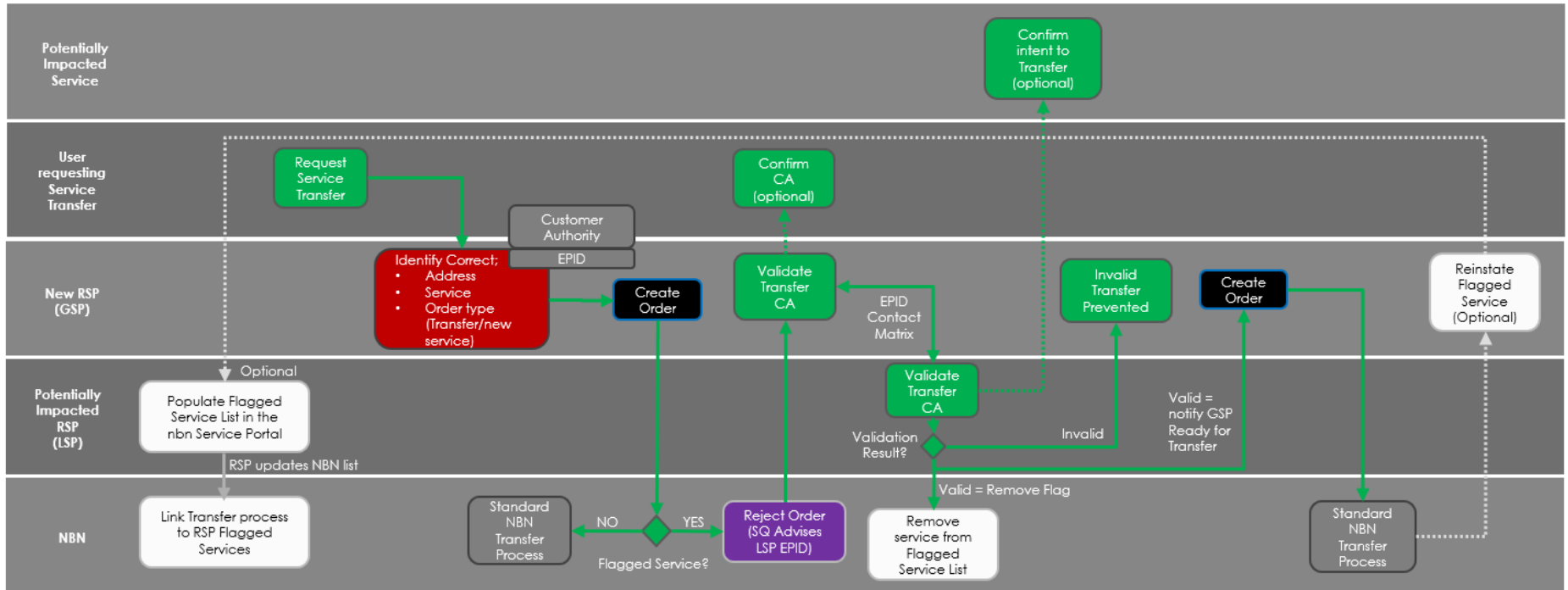
to continue /amend/ discontinue the Trial until such time as further strategic solutions for the Code have been developed.

6 REFERENCES

| Publication | Title |
|---|--|
| Industry Codes and Guidelines | |
| C647:2017 | NBN Access Transfer |
| C540:2013 Incorporating Variation No.1/2016 | Local Number Portability Code |
| C628:2019 | Telecommunications Consumer Protections (TCP) Code |
| C569:2015 | Unconditional Local Loop Service – Ordering, Provisioning and Customer Transfer Code |
| G651:2017 | Customer Authorisation Guideline |
| Legislation | |
| <i>Telecommunications Act 1997</i> | |
| <i>Telecommunications (Consumer Protection and Service Standards) Act 1999</i> | |
| <i>Competition and Consumer Act 2010</i> | |
| <i>Privacy Act 1988</i> | |
| Industry Documents | |
| Telecommunications (Migration Plan Principles) Determination 2011 and the Telecommunications (Migration Plan – Specified Matters) Instrument 2011 | |
| Telstra's Migration Plan approved by the Australian Competition and Consumer Commission (ACCC) in February 2012 | |
| NBN Co's Wholesale Broadband Agreement and Special Access Undertaking which was approved by the ACCC in December 2013 | |
| NBN Co's Wholesale Broadband Agreement | |

APPENDIX

A Trial flagged service and transfer process flow



B ACCESS SEEKER Transfer Validation Trial CONTACT LIST

Overview

Access Seekers should complete this matrix and provide to Communications Alliance. Access Seekers should maintain and keep the contacts current. Communications Alliance will maintain the contact matrix on their website – www.commsalliance.com.au, as updated from time to time. Updates will be made within 1 Business Day of notification of the change. The contact list is password protected.

Example format:

| Access Seeker Name | Migration Query Type | Phone | Email | Technical Contact | 1st level Escalation | 2nd level Escalation |
|---------------------------|--------------------------------------|--------------|--------------|--------------------------|-----------------------------|-----------------------------|
| | Reinstatement / Reversal / Amendment | | | | | |

NOTE: Where a Losing Access Seeker's contact details are not available via the contact list or no response is received from the Losing Access Seeker RSP, then a Gaining Access Seeker may contact NBN Co directly. NBN Co can then engage the Losing Access Seeker (or upstream Access Seeker) to assist.

PARTICIPANTS

The Working Committee that developed the Guideline consisted of the following organisations and their representatives:

| Organisation | Membership | Representative |
|---|-------------------|-----------------------|
| Australian Competition and Consumer Commission (ACCC) | Non-voting | Darren Kearney |
| Australian Communications and Media Authority (ACMA) | Non-voting | Chris Wong |
| Macquarie Telecom | Voting | Matthew O'Rourke |
| NBN Co | Voting | Kim Summers |
| NBN Co | Non-voting | Mark Duke |
| NBN Co | Non-voting | Xanthe Corbett-Jones |
| Optus | Voting | Mark Kubale |
| Optus | Non-voting | Daniel Salama |
| Telstra | Voting | David Fabbian |
| Telstra | Non-voting | James McKay |
| Telstra | Non-voting | Paul Sherburn |
| TPG Telecom | Voting | Alexander R. Osborne |
| TPG Telecom | Non-voting | Annie Leahy |
| TPG Telecom | Non-voting | Matt Goldsmith |
| Vocus | Voting | John Sexton |

This Working Committee was chaired by Craig Purdon of Communications Alliance, which provided project management support.

Communications Alliance was formed in 1997 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the *Telecommunications Act 1997* - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.



**Published by:
COMMUNICATIONS
ALLIANCE LTD**

**Level 12
75 Miller Street
North Sydney
NSW 2060 Australia**

**Correspondence
PO Box 444
Milsons Point
NSW 1565**

**T 61 2 9959 9111
F 61 2 9954 6136
TTY 61 2 9923 1911
E info@commsalliance.com.au
www.commsalliance.com.au
ABN 56 078 026 507**

Care should be taken to ensure the material used is from the current version of the Standard or Industry Code and that it is updated whenever the Standard or Code is amended or revised. The number and date of the Standard or Code should therefore be clearly identified. If in doubt please contact Communications Alliance