

Finder.com.au submission to the fixed line services declaration inquiry

Thank you for the opportunity to provide views for the fixed line telecommunications services declaration inquiry.

finder.com.au (“Finder”, “we”) is one of Australia’s most visited comparison site¹ with nearly four million visits to the site each month. Finder compares over 50 product categories, including ADSL broadband, NBN services, satellite broadband and mobile broadband. Our free service is independently owned by two Australians: Fred Schebesta and Frank Restuccia. Since launching in 2006, we’ve helped our users make more than 17 million decisions.

We undertake regular consumer surveys in relation to these product categories and our platform gives us a good view of the competitive landscape in each. As a result, we are well positioned to answer questions two, three and four from the consultation paper and take a position in relation to questions five and six. We have opted out of answering question one on whether the service descriptions remain current and appropriate.

Response to Question Two, Question Three and Question Four:

- **Do you consider that continued declaration of network access services will promote competition and the economically efficient use of infrastructure?**
- **Do you consider that continued declaration of resale services will promote competition and the economically efficient use of infrastructure?**
- **Do you consider that continued declaration of voice interconnection services will achieve any-to-any connectivity, promote competition and maintain economically efficient use of existing infrastructure?**

Finder regularly conducts research to track consumer sentiment and understanding around telecommunications issues. A consistent finding in our research has been that there remains a high level of confusion around the rollout of the National Broadband Network (NBN) and how it will replace current copper-based infrastructure, despite ongoing promotional campaigns from NBN Co and individual providers.

In particular, a large number of Australians do not realise that they will lose their access to existing fixed line services within 18 months of their area becoming NBN-ready. In a Finder consumer survey from February 2017, we found that 17% of Australians did not plan to switch to the NBN once it became available, while 18% had no idea how the NBN rollout would affect them. Additionally, customers who have switched do not necessarily see the NBN as preferable

¹ Experian Hitwise since November 2015

– a Finder consumer survey from May 2018 found that 34% would switch back to their pre-NBN service if that was an option.

There is also a low level of awareness about switching providers. A Finder consumer survey from July 2018 found that just 20% of customers moving to the NBN switched from their existing provider. Not declaring access to core fixed line services will mean competition is lessened further, making it even more likely that consumers won't access best-value deals.

In addition, enforced delays to HFC deployment highlight the fact that the NBN rollout remains uncertain, despite the imminent planned completion date.

Response to Question 5 and Question 6:

- **Do you support the extension of the six fixed line declarations?**
- **Is the extension of the declaration for five years until 30 June 2024 an appropriate timeframe, or should a shorter period be considered?**

It is clear there is significant confusion around NBN, a level of dissatisfaction in current NBN services, low awareness of competitive alternatives and expected delays to the NBN rollout.

Given all of these factors, Finder believes that ensuring the existing fixed line infrastructure remains fully available for a further five-year period is both a sensible and necessary step. In our view, anything less than five years may result in a less competitive market for Internet services which can only be a bad thing for the consumer.