

**IN THE MATTER OF UNDERTAKINGS DATED
13 DECEMBER 2004 PROVIDED BY TELSTRA
CORPORATION LIMITED TO THE
AUSTRALIAN COMPETITION AND
CONSUMER COMMISSION IN RESPECT OF
UNCONDITIONED LOCAL LOOP SERVICE
("the Access Undertakings")**

STATEMENT OF [c-i-c]

On 25 May 2005, I, [c-i-c] of 30 Pirie Street, Adelaide in the State of South Australia, [c-i-c], state as follows:

Confidentiality

1 [removed]

Definitions

2 In this statement the following abbreviations and terms have the following meanings:

- (a) **Access Seeker** - service provider such as Optus or AAPT seeking ULLS from Telstra;
- (b) **ACIF** - Australian Communications Industry Forum;
- (c) **Cutover** - the action taken by Telstra to complete the provisioning of a ULLS;
- (d) **DAC** - Data Activation Centre. The DAC is part of Infrastructure Services. The DAC have a major role in the provision of ULLS, including Service Qualifications, reserving cable, co-ordination of testing, co-ordinating the Cutover of ULLS between Telstra and the Access Seeker, notification of WCTA of incomplete work and co-ordination of fault testing;
- (e) **Service Qualification** - a process where Telstra checks:
 - (i) the availability of the ULLS; and

- (ii) that the use on that ULLS complies with the ACIF's Network Deployment Rules;
- (f) **ULLCIS** - ULL Carrier Interface System. ULLCIS is a Telstra system used for provisioning and Service Qualification of ULLS. It captures, validates and utilises information from an Access Seeker and provides automated transactions by file transfers between the Access Seeker and Telstra;
- (g) **ULLS** - Unconditioned Local Loop Service;
- (h) **WCTA** - Wholesale Customer Transfer Area.

Position at Telstra

- 3 I am the [c-i-c], Wholesale Customer Transfers, within Telstra Wholesale at Telstra. I have held this position since June 2003. In that role I [c-i-c].
- 4 Between February 1997 and June 2003 I was the [c-i-c] with responsibility for [c-i-c].
- 5 As a result, I am familiar with the provisioning process for ULLS.

Background

- 6 I refer to paragraph 8(b) of Annexure C to Telstra's Submission in Support of the ULLS Monthly Charges Undertaking dated 3 March 2005 ("**the Submission**") which sets out the costs incurred by Telstra's "connection group" in respect of ULLS. The "connection group" for ULLS to which that paragraph refers is the WCTA for which I am [c-i-c].
- 7 In that context, I have been asked to describe the work performed by the WCTA in respect of ULLS.

Provisioning of ULLS

- 8 The ACIF Industry Code entitled "*ULLS - Ordering, Provisioning and Customer Transfer*" ("**the Code**") sets out the processes and procedures required to be followed by both Telstra and Access Seekers in relation to, amongst other things, ordering and provisioning of ULLS. A copy of the Code is attached in Annexure A to this statement.
- 9 The ordering and provisioning process for ULLS in summary is as follows:

- (a) the process commences with an Access Seeker submitting a request for a ULLS at a particular site. Such requests are contained in an electronic file which Telstra receives via ULLCIS;
- (b) the file containing the ULLS request is automatically validated by Telstra's systems which either confirm or reject the request. This is an initial validation that:
 - (i) checks that the Access Seeker has used the correct file format in the request;
 - (ii) if the Access Seeker chooses a copper pair associated with an existing PSTN service, verifies that the PSTN service is active and the current telephone number is in correct Full National Number format;
 - (iii) verifies that service is non complex (complex products include but are not confined to ISDN, Line Hunt and Customnet Spectrum);
 - (iv) verifies that there are no pending orders in relation to the line or the existing service has not temporarily been disconnected;
 - (v) validates that the Access Seeker has a point of interconnection presence in the relevant exchange;
- (c) if the request is rejected at this initial stage, this is communicated by Telstra's systems in a file sent back to the Access Seeker via ULLCIS;
- (d) if the automatic validation confirms the request, a Service Qualification (which is part of the ULLS request validation) is undertaken by Telstra's systems. That Service Qualification :
 - (i) determines the availability of a ULLS at the site requested;
 - (ii) ensures that the ULLS can be delivered in accordance with the Access Seeker's nominated Network Deployment Class as provided in the ACIF's Network Deployment Rules; and
 - (iii) reserves a cable pair for the provision of the particular ULLS.

In approximately 50% of cases the Service Qualification is performed automatically. In these instances, ULLCIS interfaces with the systems used for Service Qualifications. Where the Service Qualification process must be completed manually, this is done by the DAC;

- (e) if the Service Qualification is successful in locating a suitable vacant copper pair or confirming that an existing in-use pair can satisfy the required deployment class, the Access Seeker will be advised that Service Qualification was successful via a file transfer in ULLCIS;
- (f) if the Service Qualification is unsuccessful for any reason, the Access Seeker is provided with a rejection advice via ULLCIS;
- (g) if the ULLS request passes Service Qualification, the copper pair will be reserved in Telstra's systems and the provisioning phase will be commenced with the issue of an order for a ULLS, followed by any field or exchange work and end with advice of ULLS Cutover completion to the Access Seeker as follows:
 - (i) ULLCIS creates an order which is submitted to the relevant Telstra systems used by the field workforce group and the DAC;
 - (ii) the requesting Access Seekers then receives notification from Telstra of a successful ULLS request. The notification is in a file transfer via ULLCIS. For a new ULLS, the access seeker will have 5 business days to confirm or cancel the order;
 - (iii) the Access Seeker then confirms, in a file transfer via ULLCIS, whether or not it wishes to proceed with ULLS Cutover. If the access seeker wishes to confirm the order, it must provide Telstra with a ULLS Cutover Notification. If the Access Seeker wishes to proceed, it will nominate a Cutover date in the range of 5-30 business days for Bands 1 and 2 and 10 to 30 business days for Bands 3 and 4;
 - (iv) once a Cutover date has been provided to Telstra, the order will be progressed to the field workforce group where the ULLS will be provisioned and tested;

- (v) upon successful completion of provisioning and testing, the Access Seeker receives a completion advice sent through a file transfer via ULLCIS;
- (vi) if the Access Seeker decides to cancel the order and not proceed with the ULLS, the allocated cable pair will revert to vacant pair status that can be used by the next available applicant. This will also occur if a Cutover notification from the Access Seeker is not received within 5 business days of the advice of the Service Qualification tests from Telstra.

10 The WCTA is involved in the ULLS provisioning process as follows:

(a) Data Alignment

Occasionally, during the validation process there may be a data alignment problem. This would present itself in an exception list within ULLCIS for WCTA staff to action. If so, WCTA staff check the relevant systems and remedy any internal system records to progress the order.

(b) Order Creation

If the automated process described above fails to create an order, then the WCTA will create one manually by typing the relevant details of the order in the relevant Telstra system.

(c) File submissions

Very occasionally ULLCIS experiences an unplanned outage or the file transfer process within ULLCIS ceases to work. On those occasions, the WCTA advises the relevant Telstra IT personnel and transfers the relevant files to Access Seekers via e-mail.

(d) Rejects

When a ULLS order is rejected following the initial validation process, the Access Seeker often contacts the WCTA to find out why the rejection occurred and how it can fix the information provided in order for the order to proceed. This occurs for over 50% of rejects, which in 2004/05 have averaged close to 1,000 per month.

(e) Cutover date changes

The Access Seeker may wish the Cutover date to occur sooner than within 5 business days. This occurs, on average, about 20 times per week. In those circumstances, the Access Seeker contacts the WCTA, which endeavours to schedule the Cutover date to meet the Access Seeker's time frames by checking workforce calendars in the relevant Telstra systems to identify if any earlier appointments are available. If none are readily available, the WCTA telephones the relevant manager in the Infrastructure Services Business Unit in order to arrange a suitable time.

(f) Escalations

The WCTA becomes involved in the process where the work has not commenced or is not completed in the following circumstances:

- (i) the Telstra technician has not performed the jumpering at the exchange on the Cutover date. In that regard the WCTA monitors Cutovers daily using ULLCIS status reports or is directly contacted by the Access Seeker. In those circumstances, WCTA negotiates a suitable time for the Cutover to be completed with the Access Seeker and arranges with the relevant field workforce group to complete the order completion;
- (ii) there is no Access Seeker site contact available upon the field workforce group staff member arriving at the customer's site. In that case the WCTA is advised of this by the DAC. The WCTA will advise the Access Seeker by telephoning or emailing that Access Seeker that the order has been placed in held status and that the Access Seeker will need to retarget;
- (iii) there is no available lead-in cable to the site. Where there is no lead-in cable the Telstra technician cannot complete the job at customer's end, even though jumpering at exchange has been completed. WCTA is advised of the lack of lead-in by the DAC. WCTA then telephones the Access Seeker and advises that no lead in cable is available and if the Access Seeker still wishes to proceed that it will have to follow the Missing Lead-in Process set out in section 11.7 of the Code, or withdraw

the ULLS request and resubmit another request using a cable pair associated with an existing service as opposed to a vacant pair.

WCTA Group

- 11 A significant amount of time of the WCTA is spent dealing with general enquiries from Access Seekers. I would estimate that, on average, the WCTA receives between 200-250 of general enquiries from Access Seekers per week. These enquiries relate to the issues set out above.

- 12 WCTA track the number of connections of ULLS performed by WCTA staff per day. Given the labour intensiveness of the process including the number of calls received by WCTA from Access Seekers, the target, which staff are expected to and usually exceed, is [c-i-c] connections per staff member per week. During this financial year, the number of connections attained by staff were, on average, [c-i-c] per staff member per week.

- 13 As the number of ULLS connections increases and as Access Seekers become less reliant on WCTA, I expect that WCTA staff will achieve a target of 20 connections per staff member per day by 2006/07. Achieving these efficiencies will depend on Access Seekers reducing the number of enquiries as a percentage of ULLS connections, thus reducing the time required to be spent by WCTA per ULLS connection.

DATED: 25 May 2005

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[c-i-c]

ANNEXURE A TO THE STATEMENT OF [c-i-c]
SIGNED 25 MAY 2005

(ACIF Industry Code “*ULLS - Ordering, Provisioning
and Customer Transfer*”)