



Australian Government

Department of Communications

Mr Sean Riordan
General Manager
Industry, Structure and Compliance Communications Group
Australian Competition and Consumer Commission
By email: ssu-migration@accc.gov.au

Dear Mr Riordan

Telstra Migration Plan – Proposed transitional arrangements for In-Train Orders

I am writing to provide the Australian Competition and Consumer Commission (ACCC) with the Department of Communications' submission on the above matter.

The Department supports the proposed transitional arrangements for in-train order (ITO) premises to allow additional time for them to obtain an active retail National Broadband Network service. The Department notes that the proposed arrangements, if implemented, would provide continuity of service for end users who have completed the migration actions required of them, in circumstances where NBN Co Limited (nbn) or retail service providers (RSPs) have been unable to deliver services prior to a region's disconnection date. This approach strikes an appropriate balance in preserving service continuity, while managing the expectations upon both nbn and RSPs to deliver services to end users in appropriate timeframes.

The proposed transitional arrangements also recognise that consumers should not be impacted when they have followed the migration action required of them. In this context, the proposed arrangements support the draft Migration Assurance Policy (MAP) framework, which encourages end users to migrate their services early in the 18 month migration window. A key element of the policy is promoting active industry involvement so that end users, particularly those who are vulnerable, are given the opportunity to migrate well before the disconnection date and with minimal risk of unexpected interruption to their services. Further information on the MAP is available at the Department of Communications' website at www.communications.gov.au.

The ACCC has also sought feedback on whether Telstra should consider applying the proposed ITO transitional arrangements more broadly and/or consider any complementary measures to address ongoing risks to service continuity. The Department supports a further expansion of the proposed ITO transitional arrangements to include all known fire alarm and lift phone services – including those without an ITO – so that those services also benefit from additional time to migrate off the copper network. We consider that this approach will provide additional assurance for services with important public safety implications.

Should the ACCC wish to discuss any of the matters in this submission, please contact Ms Jo Grainger, Assistant Secretary – Infrastructure Deployment Branch on (02) 6271 7771 or via email at Jo.Grainger@communications.gov.au.

Thank you for the opportunity to provide comment.

Yours sincerely



Ian Robinson
Deputy Secretary – Infrastructure

9 August 2015