

TELSTRA CORPORATION LIMITED

Replacement Schedule 1: Telstra existing standard processes for disconnection of Copper Services (other than Special Services)

Submission in support

25 May 2016

Summary

We are pleased to submit a replacement Schedule 1 “Telstra Existing Standard Processes for Disconnection of Copper Services (other than Special Services)” (**Schedule 1**) to the Australian Competition and Consumer Commission (**ACCC**), Wholesale Customers and nbn co for consultation. This replacement Schedule incorporates the changes required to Telstra’s processes for the ‘business as usual’ disconnection of standard Copper Services by the Government’s policy shift to a multi-technology mix (**MTM**) rollout for the National Broadband Network (**nbn**TM).

This submission explains the changes made in the replacement Schedule and sets out how it complies with the *Telecommunications (Migration Plan Principles) Determination 2015* (**MPPs**).

Background

Under clause 5.2(a) of the Migration Plan, Telstra is required to prepare a replacement Schedule 1 of the Migration Plan to reflect the changes to Telstra’s business as usual disconnection processes necessitated by the transition to a multi-technology **nbn** rollout.

The multi-technology nbn rollout involves the deployment of a range of network architectures including fibre-to-the-premises (FTTP), HFC cable, satellite, fixed wireless, fibre-to-the-node (FTTN) and fibre-to-the-building (FTTB). The use of these last two architectures by nbn co – FTTN and FTTB – may require redeployment of Telstra’s Copper network infrastructure, and therefore may impact the supply of our Copper Services, and in turn, our business as usual disconnection processes. In the case of FTTN, the Copper infrastructure is required from the node to the customer premises and, in the case of FTTB, from the building to the customer premises, being generally either an apartment or an office.

The changes required to Schedule 1 as a result of the deployment of FTTN and FTTB technologies are largely to accommodate an additional disconnection process: one where nbn co’s use of the existing Copper network infrastructure for the purpose of supplying a new nbn service may result in Telstra disconnecting Copper Services supplied over the same infrastructure without the Telstra Retail or Telstra Wholesale customer placing a disconnection order.

To reflect this change in practice, and consistent with the work recently undertaken by the Communications Alliance in developing the *Industry Guidance Note (IGN 008): NBN FTTB/N Migration Processes*, the proposed changes to Schedule 1 are:

- (1) Adding a new section 8 to Schedule 1, which outlines the process for how disconnection of Copper Services may occur in an nbn FTTB or FTTN environment; and
- (2) Adding a reference in the other disconnection processes described in Schedule 1 to accommodate the new process contained in section 8.

Adding a new section 8 to Schedule 1

Adding a new Section 8 to Schedule 1, which describes the disconnection process for both Retail and Wholesale Copper Services that are provided over the same copper path as that used by nbn co to supply services over the nbn at FTTN-Connected Premises and FTTB-Connected Premises. This disconnection of Copper Services will occur upon receipt by Telstra of notification by nbn co that it has jumped across to the nbn the Copper Path over which the Copper Services are supplied, without the need for a disconnection request from Telstra’s Wholesale or Retail Customer.

Consistent with Industry Guidance Note IGN 008, this process consists of the following key steps:

1. Telstra receiving information in a Daily Migration File from nbn co allowing the identification of the FTTN-Connected Premises and FTTB-Connected Premises at which nbn co has completed jumpering work, including the relevant Copper Path over which the nbn service will be supplied
2. Telstra then validating the Premises and the status of the Copper Service supplied

3. Once a Premises is validated, Telstra generating a disconnection order for all Retail and Wholesale Copper Services provided over the relevant Copper Path at the Premises.

Telstra will not disconnect a ULL service supplied to an FTTN- or FTTB-Premises where nbn co advises that the nbn order type involves voice-band pass through, and the ULLS customer has entered into an arrangement for Telstra to supply voiceband services under CRA167b.

The new section 8 also provides for a 5 Business Day delay in processing a disconnection order where Telstra detects any pending LNP or port requests in respect of the service supplied to an FTTN- or FTTB-Connected Premises. This is to allow an opportunity to resolve the pending requests before disconnection. If the existing order is not completed, withdrawn or otherwise resolved at the time when Telstra is required to complete the disconnection of the relevant services, Telstra will disconnect those services in accordance with the process set out in the Migration Plan.

Including a reference to Section 8 in the other disconnection processes in Schedule 1

The other change to Schedule 1 is the addition of a new paragraph into each of the disconnection processes outlined in Schedule 1 that cross-references the new disconnection process that will apply under Section 8. This reflects the fact that each of these Retail and Wholesale Services may now be disconnected by Telstra if they are impacted by the additional disconnection scenario set out in Section 8, if the Copper Services are supplied over Copper Paths at FTTN- or FTTB-Connected Premises that are included in a Daily Migration File.

The changes in the replacement Schedule are summarised in the table below.

Development	Implications
Addition of section 8	New section 8 sets out the process Telstra will follow to disconnect Retail and Wholesale Copper Services at FTTN- and FTTB-Connected Premises that are included in a Daily Migration File provided by nbn co. This is consistent with Communications Alliance's <i>Industry Guidance Note (IGN 008): NBN FTTB/N Migration Processes</i> .
Addition of text to indicate that Telstra Copper Services may be disconnected as per FTTN/FTTB process for disconnection of services.	<p>The addition of this text is to make reference to the fact that Telstra may generate the disconnection order to disconnect a Retail or Wholesale Copper Service in accordance with section 8 if that Premises is included as an FTTN- or FTTB-Connected Premises in a Daily Migration File provided by nbn co to Telstra.</p> <p>Telstra Copper services with disconnection processes set out in Schedule 1 are:</p> <ul style="list-style-type: none"> • Standard Telephony Service (STS) • Asymmetrical Digital Subscriber Line (ADSL) • Wholesale Line Rental (WLR) • Unconditioned Local Loop Service (ULLS) • Wholesale Asymmetrical Digital Subscriber Line (WADSL) • Line Sharing Service (LSS)

We believe that the changes we have made in this draft replacement Schedule accurately describe the processes required to disconnect Copper Services at a FTTN- or FTTB-Connected Premises that has been jumpered by nbn co. In addition, the changes reflect the Standard Industry Process in development in the Communications Alliance *Industry Guidance Note (IGN 008): NBN FTTB/N Migration Processes*, and apply equivalently across Retail and Wholesale services.

Draft replacement Schedule 1 is subject to consultation with and disallowance by the ACCC under clause 5.2 of the Varied Migration Plan. The ACCC:

- (a) may object to a replacement Schedule if it is not compliant with the MPPs;
- (b) may not object to a replacement Schedule if it is required by and consistent with a Standard Industry Process or applicable generally accepted industry arrangement.

We consider these changes are practical and provide clarity regarding the processes we will use for disconnecting Copper Services at a FTTN- or FTTB-Connected Premises jumpered by nbn co.