IT'S HOW
WE CONNECT

Telstra Corporation Limited

Required Measure 1(b) – Pull Through
Exception Event and Installation of
Temporary Cable Notifications

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1   Background

On 27 February 2012, the ACCC accepted Telstra's Structural Separation Undertaking (**Undertaking**) under section 577A of the Act and approved Telstra's draft Migration Plan (**Plan**) under section 577BDA of the Act.

The Undertaking came into force on 6 March 2012 and the Plan commenced on 7 March 2012.

The Plan requires Telstra to submit to, and have approved by, the ACCC, Required Measures setting out a number of matters, including the process by which Telstra will give notice to affected Wholesale Customers of notification Telstra receives from NBN Co that:

(i)   NBN Co is prevented by a Pull Through Exception Event from completing Pull Through Activities, Cable Rectification or the installation of a Temporary Cable at a Premises and which relates to a Copper Line used to supply a Wholesale Service; or

(ii)   NBN Co has installed a Temporary Cable which is being used to supply a Wholesale Service.

~~together~~each of (i) and (ii) being, a **Notification Event** for the purposes of this Required Measure.

2   Defined terms and interpretation

A term or expression starting with a capital letter:

a)   which is not defined in these Required Measures, has the meaning given to it in the Plan; and

b)   which is not defined in the Plan, has the meaning given to it in the Undertaking.

Business Hours means between 9.00am and 5.00pm on a Business Day.

3   Overview

The process for connecting services to the NBN at Premises allows NBN Co, in certain circumstances, to use the copper and HFC cables that are lead-in cables to the Premises as pull through cables to enable NBN Co fibre cables to be hauled through lead-in conduits (**LICs**). An example of when pull through may be used is where the LIC has sufficient capacity for an additional fibre cable, but that capacity is limited by the presence of the existing cable/s, for example, due to the way the existing cable/s are resting in the LIC, particularly at bends in the LIC. Pull through activities are described in more detail in Clause 10 of the Plan. Although the decision as to whether Pull Through Activity occurs lies with NBN Co in each instance, Telstra expects the number of instances where a Notification Event occurs to be small.

The Required Measure 1 (a) covers the process by which Telstra will use reasonable endeavours to obtain the relevant consents and releases from Wholesale Customers for Pull Through Activities in accordance with Clause 10.1 of the Plan. This Required Measure 1 (b) complements Required Measure 1 (a) by setting out the process by which Telstra will communicate to an affected Wholesale Customer that Telstra has received notification from NBN Co of a Notification Event.

This Required Measure 1 (b) firstly illustrates the communication arrangements that will be established between Telstra and NBN Co for notification of these events, which are then used as the basis for the development of this Required Measure.

4 Types of Pull Through Exception Events

A Pull Through Exception Event can occur at any time during Pull Through Activities, installation of a Temporary Cable or Cable Rectification for a LIC. The three most common types of Pull Through Exception Events are listed below.

4.1 Prevention of completion of Pull Through Activities

A Pull Through Exception Event can arise when NBN Co has attempted to undertake Pull Through Activities at a Premises but, because of the Pull Through Exception Event, the Pull Through Activity is not able to be successfully completed. That is, NBN Co's fibre has not been able to be passed through the LIC to the Premises and Cable Rectification is not completed. This could happen, for example, where NBN Co starts Pull Through Activities for which it has consent, but during the Pull Through Activities an end user withdraws its consent for NBN Co to be at the Premises.

4.2 Prevention of Cable Rectification by a Copper Line

A Pull Through Exception Event can also arise when the Copper Line was fully or partly removed as part of Pull Through Activities but NBN Co cannot return the previous (or replacement) Copper Line back into the LIC. In this situation, the Telstra copper services cannot be reconnected.

An example may be when very bad weather requires NBN Co to leave the site and prevents NBN Co re-inserting the Copper Line to allow the supply of services by Telstra.

4.3 Prevention of installation of a Temporary Cable

A Pull Through Exception Event can also arise when NBN Co is prevented from installing a Temporary Cable to provide services on the NBN (and has not otherwise been able to complete Cable Rectification). Within this Required Measure, installation of Temporary Cable is only associated with Pull Through Activity. NBN Co will only install a Temporary Cable when Cable Rectification is unsuccessful. An example is when a blockage in the LIC prevents the existing copper cable from being reinstated in the LIC and a Temporary Cable needs to be used instead of the copper cable but NBN Co would be exposed to an unmanageable workplace health and safety risk to install that Temporary Cable.

5 The Notification Process for Notification Events

5.1 Notification from NBN Co to Telstra about Notification Events

This Required Measure applies from the time NBN Co provides the relevant notification to Telstra about occurrence of the Pull Through Exception Event or the installation of a Temporary Cable. If that notification is not provided by NBN Co, then Telstra will be unable to provide any notice to Telstra Wholesale Customers.

Within the context of NBN Co performing Pull Through Activities, NBN Co is obliged to notify Telstra of a Pull Through Exception Event as described above as soon as practicable, and also when NBN Co installs a Temporary Cable. In the latter case, this notification is provided whether or not a Pull Through Exception Event occurs on that Temporary Cable that prevents installation being completed.

5.2 **Telstra Wholesale informs Telstra Wholesale Customers**

This section sets out the communication Telstra Wholesale will provide to affected Telstra Wholesale Customers when it receives the relevant notification from NBN Co that either a Pull Through Exception Event has occurred, or that NBN Co has installed a Temporary Cable and that cable is being used to supply a Wholesale Service of that Wholesale Customer.

Telstra Wholesale will promptly give notice to the affected Telstra Wholesale Customer of the Notification Event as notified by NBN Co (other than to the extent that the information is confidential), as set out below.

5.3 **Steps in the Notification Process**

The steps below indicate how Telstra will notify an affected Wholesale Customer of a Notification Event that has been received by Telstra from NBN Co.

Steps	Description	Initiating Party	Receiving Party
1 NBN Co reports Notification Event to Telstra	NBN Co will notify Telstra (current arrangements are that this will occur by telephone to Telstra's help desk) that a Notification Event has occurred at a Premises. This notification could occur inside or outside Business Hours, but it must occur within the hours of operation of the help desk (as set out below).	NBN Co	Telstra help desk
2 Telstra records Notification Event in its IT system	At the same time that the telephone notification is being received, Telstra help desk staff will update Telstra's IT data system developed for storing migration address and service information (**NTT**), to include a record of the fact that a Notification Event has occurred at the Premises. This IT record in NTT will include the information about the Notification Event that occurred, as advised by NBN Co.	Telstra help desk	Telstra (NTT System)
3 Identification of affected Wholesale Customer	Telstra's help desk staff will load the information into the NTT system. The NTT system will match the details of the Premises as notified by NBN Co with the details in Telstra's own systems. The NTT system will present information to the Telstra help desk identifying any Wholesale Customers affected by the Notification Event. If NTT presents more than one Wholesale Customer providing services at the Premises and NBN Co ~~do~~does not notify Telstra which Wholesale Customers are affected by the Notification event, then Telstra will notify all Wholesale Customers potentially impacted by the Notification Event.	Telstra help desk	Telstra NTT system
4 Flag in assurance systems	Telstra's assurance system for recording ~~customer~~service faults (currently SIIAM for copper services) will be updated by the staff at the Telstra help desk as part of registering the notification information. The timeframe for this step being completed is expected	Telstra help desk	Assurance system

Steps	Description	Initiating Party	Receiving Party
	to be within minutes of the receipt of the notification information. The update will flag the services at the Premises so that if a fault is reported at the Premises, the Notification Event can be communicated to the customer who may be inquiring about the fault, whether ~~to~~that customer is a ~~w~~Wholesale Customer or a retail customer. The update in SIIAM will automatically trigger a corresponding update of LinxOnline Service (LOLS). Wholesale Customers can access key information about the Notification Event through LOLS.		
5 Notify Telstra Wholesale	Telstra help desk staff will then advise the designated Telstra point of contact for Telstra Wholesale of the Notification Event. This notification will occur via email to an established Telstra Wholesale email address. After the email is sent the NTT update is completed.	Telstra help desk	Telstra Wholesale contact Point
6 Telstra Wholesale notify Wholesale customer	The Telstra Wholesale point of contact will organise for the Wholesale Customer to be advised that the Pull Through Exception Event occurred. We expect that notification to the Wholesale Customer will be within 4 Business Hours of Telstra being advised by NBN Co of a Notification Event to the Telstra help desk during its hours of operation as described below, in at least 90% of cases. Telstra Wholesale will ~~make contact with~~advise the Wholesale Customer ~~using at least one channel of communication (eg email), to advise~~ of the Notification Event. using a business as usual communications process which Telstra Wholesale uses to notify that Wholesale Customer of service outages. The notification sent to the Wholesale Customer will contain all the relevant information from SIIAM set out in 5.4 below.	Telstra Wholesale point of contact	Telstra Wholesale Customer
7 Acknowledge ment	The ~~fifth step is for the~~ Telstra Wholesale Customer ~~to~~will then acknowledge receipt of notification from Telstra and proceed to initiate their customer communications.	Telstra Wholesale Customer	Telstra Wholesale
8 Record contact	Telstra will record and store all advice to and from Telstra Wholesale customers about Notification Events in accordance with Telstra's record keeping practices.	Telstra Wholesale	Telstra Wholesale database

5.4   **Details of the Notification to Telstra Wholesale Customers**

The notification advice provided to TW customers will include:

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- the Telstra fault reference number;

- the service address and/or NBN locations ID;

- Exception Event start date and time;

- Reason for Pull through Exception event; and

- other information provided by NBN Co to Telstra in respect of the Notification Event except information which is confidential information of NBN Co, e.g. contact details of the NBN Co technician.

In addition, the Wholesale Customer can search LOLS fault records to track progress of the record using search functions based on either the Telstra fault reference number provided in the notification or the full national number (FNN).

5.4 5.5 Telstra Help Desk 1800

The Telstra help desk is the primary point of contact for the NBN Co to advise Telstra about the Notification Event. The help desk will be staffed by trained Telstra employees who will be experts in communication activities. The help desk is staffed between 7am to 8pm Sydney time Monday to Friday, excluding national public holidays., unless otherwise agreed with NBN Co (in which case Telstra will make such information available to Wholesale Customers). Outside these hours there will be a recorded message advising NBN Co to notify when the help desk is open to receive Notification Events. The Telstra help desk described in this Required Measure is a business group located outside Telstra Retail.

6 Process Flow Diagram

The following flow diagram illustrates the communications process for Pull Through Exception Events from end to end. Telstra's direct involvement begins part way through the end to end process.

Pull Through Exception Event – DRAFT v0.6 281112

Phase

Business Rules

Pull Through Exception Event in respect of Pull Through Activities installation of any Temporary Cable for Cable Rectification for a LIC and one or more of the following:
- A Force Majeure event
- The withdrawal of any Required Consent other than as caused by breach of the Infrastructure Services Agreement by NBN Co
- A LIC Property Damage Risk
- A LIC OH&S Risk OR
- Any other circumstance

That would prevent a Competent Contractor from being able to complete the Pull Through Activities, Cable Rectification or installation of a Temporary Cable.

NBN Co

From: Pull Through Activity → Pull Through Exception/ Notification Event experienced → NBN Co personnel notify end user → NBN Co advise Telstra Help Desk of Exception Event → To: NBN Reinstatement process

From: Temporary Cable Installation

Telstra Help Desk

Notification registered in NTT → Notification recorded in Customer Trouble Ticket system → NTT Indicates Wholesale Customer impacted? — NO → To: Telstra Retail Process

NTT Indicates Wholesale Customer impacted? — YES → Notify Telstra Wholesale

Advice of Exception Event received & logged → Wholesale customer advised of Exception Event → To: Reporting Process

Wholesale Customer

Advice of Exception Event is to be received as soon as practicable, no later than 2 business days after receiving the notice from NBN Co

Notification of Exception Event received → To: Own Customer Management process

End User

End User Receives notification

Systems/Tools

NTT   SIIAM   NTT   Local Database or Spreadsheet

7 Equivalence

Telstra's process to notify wholesale customers of notification events will be equivalent as between Wholesale Customers and Telstra's Retail business units in respect of Telstra updates to the fault reporting databases, which automatically creates a fault record in LOLS.

The step to notify Wholesale Customers of Notification Events (as set out in step 6 of section 5.3 of this Required Measure) is a notification made to Wholesale Customers only, and is in addition to any notification of a Pull Through Exception Event to Telstra's Retail business units.

8 ~~7~~ Reporting

Telstra's performance against this required measure will be monitored and reported on a quarterly basis as part of a Migration Plan Compliance Report, commencing from the first full Quarter after acceptance of this Required Measure by the ACCC:

The report will contain the:

- total number of Notification Events that were notified by NBN Co to Telstra for the relevant Quarter in all Rollout Regions on or after the Ready for Service Date;

- total number of Notification Events that were notified by NBN Co to Telstra for the relevant Quarter in all Rollout Regions on or after the Ready for Service Date that affected one or more Wholesale Customers;

- total number of Notification Events that were notified by NBN Co to Telstra for the relevant Quarter in all Rollout Regions on or after the Ready for Service Date that affected one or more Wholesale Customers, and which Telstra provided notification to all the relevant Wholesale Customers under this Required Measure~~.~~; and

- actual performance against the target service metric of 90% of the total notices about Notification Events being communicated to Wholesale Customers within 4 Business Hours from receipt of the completed notices from NBN Co of the relevant Notification Events.