

30 January 2024

To: Australian Competition and Consumer Commission By email: <u>ServiceLevelsRKR@accc.gov.au</u>.

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Re: Draft Record Keeping Rule - NBN service quality and network performance

Aussie Broadband Limited (**Aussie Broadband**) welcomes the opportunity to respond to the Australian Competition and Consumer Commission (**ACCC**) consultation into the draft Record Keeping Rule (**RKR**) relating to NBN Co's service quality and network performance.

Aussie Broadband is supportive of the introduction of a new RKR relating to NBN Co's service quality and network performance. We are in favour of increased accountability and transparency from NBN Co and believe this will be to the benefit of both end users and retail service providers (**RSPs**).

Clear reporting on service quality and network performance ensures that NBN Co is accountable when investigating and providing information about network or performance issues. Aussie Broadband is also supportive of the proposal to collect data in instances where responsibility for reduced service quality or network issues rests on the RSP, introducing greater accountability for RSPs and improved outcomes for consumers. For this reason, Aussie Broadband is of the view that the RKR requirements are fair and balanced, as the data will reflect scenarios in which NBN Co has contributed to network or performance issues, as well as where the RSP or end user was responsible.

Aussie Broadband is also supportive of the ACCC's proposal to collect data on the number of services experiencing performance incidents that are not categorised by NBN Co as a fault. This data will provide improved analysis of network performance that encapsulates all types of dropout events experienced by end users.

We appreciate the opportunity to respond to the consultation on the draft RKR and would be willing to discuss our submission further at your convenience.

Sincerely,

Andrew Webster

General Manager - Risk, Compliance & Regulatory Affairs