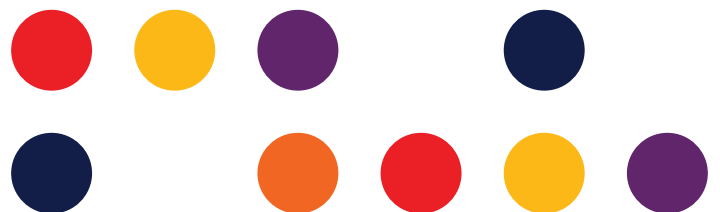


# Draft Record Keeping Rule – NBN service quality and network performance: further consultation paper

ACCC

January 2024

Public submission



## Submission

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TPG Telecom appreciates the opportunity to respond to the ACCC's further consultation regarding a proposed draft Record Keeping Rule (**draft RKR**) for NBN Co in relation to its service quality and network performance (**Consultation Paper**).

As noted in TPG Telecom's submission dated 17 February 2023 to the ACCC's initial consultation, we believe NBN Co should face greater accountability and scrutiny for the quality and performance of broadband services it offers to Australians, who underwrite the billions of dollars of funding received by NBN Co.

TPG Telecom supports the changes made to the draft RKR, which largely align with feedback previously provided by TPG Telecom and will provide a more comprehensive view of service quality and performance metrics related to NBN broadband services.

In response to the specific questions in the Consultation Paper:

1. *Are the aspects on service quality and network performance, the service level metrics and proposed data, including levels of disaggregation, set out in the draft RKR appropriate for an RKR for NBN Co?*

TPG Telecom considers the proposed metrics are appropriate and largely reflective of feedback provided by us (and other stakeholders) to the initial ACCC consultation.

2. *Should metrics for network activity and network availability be included in the RKR?*

TPG Telecom supports network activity and availability metrics being included in the RKR.

3. *Should any other metrics be included and if so what aspects of service quality and network performance should they cover?*

In TPG Telecom's response dated 17 February 2023, we supported metrics be included for (a) number of services subject to a Downgrade Event in relation to NBN Co's FTTP upgrade and (b) number of outstanding service faults at the end of each quarter and the age of those faults. We welcome further explanation from NBN Co as to why these metrics should not or cannot be provided.

4. *In the RKR we are generally using the definitions of key terms used by NBN Co in current Wholesale Broadband Agreements and/or NBN Co's Special Access Undertaking. Are there any issues in adopting this approach?*

We have no objection to the ACCC adopting this approach, to ensure consistency with terminology in the Wholesale Broadband Agreement and NBN Co's Special Access Undertaking.

5. *Is quarterly reporting appropriate?*

While TPG Telecom supports quarterly reporting, as noted in our submission dated 17 February 2023, in some circumstances it may be beneficial to segment data monthly. For example, data relating to total number of end-user faults and rectifications, total number of outages, and total number of end-user performance incidents. This could assist the ACCC and industry to better determine any noticeable trends in service levels. In order to minimise the reporting burden, NBN Co could report on a quarterly basis but provide that data segmented by month.

6. *We are proposing that the RKR expire 5 years after commencement and that at or before that time the RKR may be reviewed by the ACCC. Is an expiration date of 5 years appropriate?*

We consider the RKR should be continually updated to account for changing circumstances and not made on a 'set and forget' basis. We believe a 3 year expiry period is appropriate. This would see the RKR more closely aligned in timing with the end of the first regulatory cycle of the NBN Special Access Undertaking accepted on 17 October 2023, being 30 June 2026.