



31 March 2017

Ms Ann Palmer
Committee Secretary
Joint Standing Committee on the National Broadband Network
Parliament House
Canberra ACT 2600

RE: Terms of reference

Dear Ann,

I am writing to you in response to your invitation for submissions (your email dated 25 November 2016) regarding the recently developed Joint Standing Committee on the National Broadband Network (Committee) terms of reference.

Thank you for the opportunity to comment on the Committee's terms of reference. The item of most relevance to Communications Alliance is in relation to "other matters pertaining to the national broadband network". Communications Alliance engages with Industry and NBN Co (nbn) in a variety of areas dealing with the National Broadband Network (NBN) and a number of our Working Groups and Committees are involved in the development of Industry Codes, Guidelines and Standards, with an overall objective to assist in facilitating the effective rollout of the NBN.

All of these Working Groups and Committees include representatives of nbn, with some being chaired by nbn representatives.

We look forward to continuing our work in the area of the NBN and assisting the work of the Committee further if we can.

Please find attached as Appendix A an outline of the relevant Working Groups and Committees within Communications Alliance, their terms of reference and an update as to the current activities of each.

Yours sincerely,

John Stanton
Chief Executive Officer

APPENDIX A – Communications Alliance NBN-Related Working Groups (WGs) / Working Committees (WCs).

Below is an overview of the Communications Alliance Working Groups and Committees involved in the NBN and an update on the status of the development of relevant Industry documentation.

NBN Over-The-Top Services Transition (NOST) Working Group.

The NOST WG has been established to develop communications and operation plans to:

- help Retail Service Providers (RSPs) and Over-The-Top (OTT) service providers to manage transition of relevant services and/or devices from copper to fibre-based telephone services;
- assist end-users of OTT services (including personal medical alarms, security, monitored fire alarms and lift emergency phones) to manage transition from copper to fibre-based telephone services;
- act as a forum to encourage interaction between RSPs and OTT providers to manage interworking and migration from copper based to fibre-based telephone services; and
- act as a forum for the sharing of test results and trials between RSPs, OTT providers and nbn.

The NOST WG is set to reconvene in the near future once the Department of Communications and the Arts (DoCA) releases their updated *Migration Assurance Framework (MAF)*. The NOST WG will then review both the MAF and recently developed *Good Practice Guide* (developed by the DoCA Monitored Fire Alarm and Lift Phone WGs) to determine if any alignment changes are required to the *IGN004:2016 Migration of Legacy Services Industry Guidance Note*.

WC50 – Number Portability – Future IP Model

WC50 has been established to consider the different roles of Industry participants in number portability (e.g. carriers, access providers, wholesale aggregators and resellers) as underlying network technologies change from circuit switched to IP and to identify options for a future common platform for number portability that:

- facilitates the development of a consistent method for the porting of telecommunications numbers on a range of services; and
- reflects Industry experiences with porting telecommunications services on the NBN.

Recently WC50 developed a *User Requirements for Future Local, Mobile and 18/13 Number Portability for Australia* document. Feedback was sought from Industry stakeholders on the document, which is now being reviewed by WC50, with an aim to develop network and operational plans.

WC53 – NBN Access Transfer

Initially, an RSP Transfer WG was established in October 2011 to consider requirements for a fibre-enabled transfer process. Key to discussions was the need for automated processes to be in place via the nbn Business-to-Business (B2B) portal. nbn advised at the time that inclusion of a

transfer service qualification and means of identifying a transfer request via its portal, was at a minimum 18 months to two years away from being implemented. Without an agreed transfer process, customers wanting to change providers would be required to go through a disconnect–connect process which would result in service interruption.

In mid-2013, WC53 NBN Fibre Access Transfer was established to develop an *NBN Fibre Access Transfer Industry Guideline* that would:

- establish operational principles which will enable the transfer of an NBN fibre access service between RSPs;
- establish minimum operational requirements on RSPs, access seekers and access providers in the transfer of an NBN fibre access service between RSPs; and
- minimise end user impacts during the transfer of an NBN fibre access service between RSPs.

Over time the WC name was amended to WC53 NBN Access Transfer and the document to be developed was now to be a registered Code instead of a Guideline. The decision to register a Code was to allow for an increased ability for Industry participants to compete, giving RSPs certainty that all participants were required to comply with and follow the same processes. It also gives customers the ability to choose their services from whichever RSP they wish.

The *C647:2017 NBN Access Transfer Industry Code* was registered by the ACMA on 16 March 2017.

WC58 – VDSL2 and Vectoring

WC58 has been established to perform an area of work identified by the Customer Equipment and Cable Reference Panel (CECRP) and the Network Reference Panel (NRP). In conducting the revision of the Codes and Standards which fall under its remit, WC58 is to:

- align with international developments in VDSL2 technology e.g. ITU-T Recommendations G.993.2 and G.993.5;
- incorporate Amendment No.1/2012 to AS/ACIF S043.2:2008 into a revision of AS/ACIF S043.2:2008;
- to adopt international/overseas Standards and Australian Standards (AS and AS/NZS) wherever possible, recognising the changeability, applicability and testability of those Standards;
- to only develop mandatory requirements where no international/overseas Standards or Australian Standards (AS and AS/NZS) exist or where national deviations to international/overseas Standards and Australian Standards are required;
- to review the references to AS/CA Standards and other Industry and regulatory Standards and documents; and
- to follow the Guidelines for developing Standards for Customer Equipment and Customer Cabling.

Currently WC58 is continuing its work to develop a new Code with Industry arrangements for superfast broadband services, complementing and based on a revision of the *C559:2012 Unconditioned Local Loop Service (ULLS) Network Deployment Industry Code*.

WC63 – Copper Migration Processes and Solutions

WC63 has been established to document the roles and responsibilities of each relevant party, i.e. Telstra, nbn, RSPs and application service providers, within the copper disconnection process. The WC is responsible for developing a process to support case management of the various customer groups in relation to the disconnection process. The WC will explore the possibility of a delegated case management process for the management of the subset of customers not able to be managed by RSPs for a variety of reasons.

In 2014, WC63 published the *G652:2014 NBN Migration Management Industry Guideline*. Taking into account the *Migration Assurance Policy* developed by DoCA, and the implications of any related Government decision-making for the migration process, a revision of the Guideline was undertaken and published in late 2016.

Similar to the NOST working group, WC63 will reconvene to consider the DoCA MAF and any associated revision required to the *G652:2016 NBN Migration Management Industry Guideline*.

WC68 - NBN FTTB/N and HFC Migration Processes

WC68 has been established to perform an area of work identified by Telstra, nbn and the ACCC in the provision of guidance to Industry and other stakeholders in respect of:

- o the establishment of a Guideline capturing the interim migration processes for initial NBN Fibre To The Basement (FTTB) and Fibre To The Node (FTTN) migrations (on both the connection and disconnection side); and
- o the establishment of the long-term migration processes governing migration from a copper or Hybrid Fibre-Coaxial (HFC) network to an FTTB/N or HFC service either on the NBN or a third-party network.

This includes consideration of the following issues:

- the steps governing product removal and disconnection of services on the copper network after a customer has acquired an FTTB/N or HFC service;
- how reversals, reinstatement and amendments should operate;
- processes for dealing with data misalignments;
- an agreed Industry transition process for special services to limit service disruption;
- information required by the 'losing RSP' and protection of this information; and
- information required by nbn and the 'gaining RSP' to correctly identify the copper pair to be transitioned.

In September 2015, the WC published the *IGN008 NBN FTTB/N Migration Processes Industry Guidance Note*.

Currently WC68 is discussing the development of a principle-driven Guideline, which is designed to document the processes required to authorise, validate and complete a migration of legacy services to the NBN.

WC70 – Connect Outstanding

WC70 has been established to revise the existing *C617:2005 Connect Outstanding Industry Code* to manage the timely connection of a new occupant's basic access service when the previous occupant has not yet cancelled their service. The WC, while undertaking this revision, was also tasked with considering:

- the Unconditional Local Loop Service (ULLS) and any bilateral agreements which are currently in place;
- the residual NBN supply and flow consumer service issues; and
- whether the current limitation of the Code to Standard Telephone Services is sufficient to support access services across ULLS and NBN.

The *C617:2017 Connect Outstanding Industry Code* was registered by the ACMA on 16 March 2017.

WC76 - Pit and Pipe Revision

WC76 has been established to create a revised *Fibre Ready Pit And Pipe Specification For Real Estate Development Projects Industry Guideline (G645:2011)*, with a particular focus on:

- adding content on multi-unit and multi building developments;
- aligning with other Industry documents and practices; and
- correcting any identified typographical error(s).

Currently WC76 is reviewing comments on its ballot of the revised draft.

WC79 - Customer Cabling Connection to the NBN

WC79 has been established to create a revised *G649:2014 Cabling existing telecommunications services in the customer's premises for the NBN via FTTP Industry Guideline*, taking into account the following:

- the nbn Multi-Technology Mix (MTM) access technologies, expanding on the existing guidance on Fibre to the Premises (FTTP) and to now include guidance for Fibre to the Node (FTTN), Fibre to the Building (FTTB), Fibre to the Distribution Point (FTTdp) and Hybrid Fibre-Coaxial (HFC), based on the most currently available Industry information;
- newly deployed technologies in the MTM such as reverse power feeding;
- the migration of OTT services from legacy networks, including services for monitored medical alarms, security alarm panels, monitored fire alarms and lift emergency phones; and
- alignment with the recently revised *IGN 004:2016 Migration of Legacy Services - Industry Guidance Note*.

Currently, WC79 is finalising the drafting of the revised *G649:2014 Cabling existing telecommunications services in the customer's premises for the NBN via FTTP Industry Guideline*.