



Submission No. 10

Dr Kate Sullivan
Joint Committee on the National Broadband Network
House of Representatives,
PO Box 6021,
Parliament House,
Canberra ACT 2600

Protection for aged and at-risk persons during NBN rollout

Dear Joint Committee Members,

PERSA is the Australian peak body representing manufacturers, suppliers, monitoring services and consumers of Medical Alarms and Personal Response Services (PRS). We are making this submission to the Joint Committee because we are extremely concerned about a potential life threatening situation resulting from the rollout of the National Broadband Network (NBN) in Australia.

We estimate there are approximately 250,000 existing medical alarms protecting aged and at-risk persons in this country, both in their own homes and in residential aged-care facilities.

For these life-critical devices to continue to work over the NBN they must be connected to an analogue port on the Network Termination Unit (NTU) located in clients premises and also be provided with a high quality voice-grade quality of service (QoS) over the network.

PERSA and others have made numerous submissions to the Communications Alliance, NBN Co., and the Department of Broadband, Communications and the Digital Economy drawing attention to the need for the provision of an analogue port and high QoS for connecting existing medical and security alarms. Subsequently, two analogue ports (UNI-V ports) have been provided on the NTU and a voice grade QoS is available over the network.

However, connectivity over the UNI-V port also requires the customers Retail Service Provider (RSP) to support the UNI-V port service, and at the present time there is no mandatory requirement to do so. Rather, under the proposed arrangement it is left to each RSP to decide whether or not to support the UNI-V port service.

Our information is that many RSPs do not plan to support the UNI-V ports and in such a situation any medical alarm present, (or for that matter any other existing telephone equipment like security alarms and Fax machines), will cease to operate when the NBN is connected.



Naturally, typical users of medical alarms are not aware of the technical requirements of their equipment and in many cases they run the risk of being locked-in to a long term telecommunications contract with an RSP which, for them, is unsuitable.

PERSA has recently corresponded with all Federal Members concerning this issue and has received many very supportive comments. The Ministers office has advised they will be forwarding PERSA a formal response shortly.

In recent discussions, NBN Co. advised that not all RSPs intend to provide services to retail clients, and therefore there would be no reason to force those RSPs to support the analogue (UNI-V) port service. Rather than a mandatory legislative requirement, as suggested in our letter to Members, the same objectives may be obtained through the following initiatives:

1. Require RSPs to perform a survey of existing telephone equipment in a prospective client's premises. PERSA can provide a list of questions for RSPs to ask potential clients, which will help identify if a medical alarm is present.
2. Require RSPs to properly inform potential client's about the compatibility of their service offering with equipment identified in point 1 above.
3. Require RSPs to include information about service compatibility with medical alarms and other telecommunications equipment in their product sales information.
4. Place a list of RSP's who can support existing medical alarms through the UNI-V port in a prominent position on the NBN Co. website.
5. In order to ensure preservation of the correct Mode-3 wiring format for medical alarms, require all RSPs that remove the copper service to only connect the analogue (UNI-V) port to the clients incoming copper exchange line.
6. In order to ensure the continuing operation of any medical alarm equipment, require all RSPs to perform a medical alarm test-call through to the emergency monitoring centre immediately after service change-over. If the medical alarm fails the test the RSP should immediately reconnect the copper service to the medical alarm in the original configuration.
7. Lengthen the telecommunications service contract cooling-off period from 10 days to 30 days, to allow for further identification of any non-compatible equipment.
8. NBN Co. to educate consumers and RSP's about the requirements of medical alarms.
9. Ensure the copper service to a client is not disconnected or decommissioned before all medical alarm connectivity issues are fully resolved.



Other issues of concern to PERSA members include the power fail run time, provision, ongoing maintenance, and cost to the consumer of battery back-up when a medical alarm is present.

The proposed battery run-time for the NBN customer equipment falls significantly short of the 36 hours required for medical alarms under Australian Standard AS 4607. As the power for the NBN customer equipment is derived from the client's domestic mains power, and given the short run-time during a power failure, we expect the NBN service will be significantly less reliable than the copper network it is destined to replace.

It is proposed to provide the standard 6-hour battery backed-up power supply at no cost to the consumer at the time of NBN service installation (optional by informed consent). Alternative proposals that have been suggested are:

1. NBN Co to supply longer run-time battery back-up options, and
2. NBN Co allowing after-market suppliers to connect their own, longer run-time, battery backup units.

PERSA would support both of these proposals.

However, supplying an optional battery back-up unit at the time of NBN service installation only addresses the situation where a medical alarm is present.

It is unclear who will pay for the battery back-up unit when a new medical alarm is required for a client who has an existing NBN service, but without battery-back-up.

Similarly, it is unclear what will happen when a new medical alarm is required for a client who has previously entered into a service contract with an unsuitable RSP, (when their existing RSP cannot support the analogue service required for the new medical alarm).

PERSA members are very grateful for the opportunity to make this submission to the Joint Committee.

Yours sincerely

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