

Friday 10 August 2012

The Secretary
Joint Committee on the National Broadband Network
PO Box 6021
Parliament House
CANBERRA ACT 2600

SUBMISSION TO FOURTH REVIEW OF NBN ROLL OUT

Re: Considerations for elderly and disabled people using medical alarms

Tunstall is a provider of medical alarms, telehealthcare solutions and monitoring services to over 200 community care organisations, 180 retirement villages. Tunstall is under contract to the Australian Department of Veterans' Affairs for the provision of medical alarm services for their clients under the DVA Rehabilitation Appliance Program (RAP).

We provide 24 hour response services to over 40,000 alarms across Australia, which service approximately 72,000 individual people. Australia- wide it is estimated by the industry body PERSA that there are over 200,000 medical alarms deployed.

Typically, medical alarm users are elderly, disabled, or live with a chronic disease. All of these people rely on their medical alarms as potential life-saving equipment in the event of an emergency, as well as reassurance and support to live independently at home.

With the introduction of the National Broadband Network (NBN) people with medical alarms will need to be making informed decisions about how their service will continue to operate on an NBN service. Potentially if they make decisions without all the facts, their alarm service may not work, putting them at risk to get the help they need when they need it.

Tunstall are working closely with NBN Co to ensure our medical alarms, old and new will work over the new service. Our alarms will work over the NBN providing the householder has any of the following conditions in place:

- They keep their existing copper line and as long as they don't cancel the copper line service; or
- Their new RSP provides voice services over the UNI-V ports; or
- Their new RSP provides a tested ATA for connecting the alarm to the data services; or



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- The householder swaps their alarm out for a new GSM type alarm, bypassing an NBN service entirely

We raise the following scenarios for consideration:

Scenario 1 - Householder refuses to enable NBN to their home:

According to current published information, the copper connections and telephone service may continue to be operational for up to 18 months post NBN rollout to the area – this will reduce the risk to our clients for this period.

Questions:

- What happens after this?
- Will there be a lead time to enable the householder to transition?
- What potential costs will the householder incur if they refuse to enable the NBN at the initial roll out?

Scenario 2 - Householder accepts NBN under the following conditions:

For Fibre Connections:

1. According to published information, there are approximately 35 Retail Service Providers (RSPs) who have been accepted and endorsed for the NBN. Currently, it is our understanding that less than a third RSPs have the ability to facilitate Voice calls over the UNI-V ports on the Network Terminator Device (NTD), which enables a medical alarm to operate as if on a POTS service. Householders need to select an RSP that provides this. ***How will people know who to select to ensure their alarm continues to work?***
2. Power Supply - the NBN power supply unit (PSU) and battery backup to supply power to the UNI-V ports is optional for householders. Without this option the householder's alarm and telephone service will not work in a power outage. ***How will people know to select the PSU to ensure their alarm continues to work during a power outage?***
3. Length of back up time frame - the current NBN (PSU) only provides for 3-5 hours of support in the event of a power outage. Many of our customers and corporate client groups expect that their alarm equipment will have a minimum of 36-40 hours back up support in line with the requirements of the AS4607 standards for the provision of Personal Emergency Alarm Services. For example – the DVA require this as a minimum for their clients. ***Can NBN Co work closely with industry to ensure the continuation of this standard by providing an alternative battery backup device?***

For Fibre or Wireless Connections:

1. Not all RSPs provide a UNI-V port. Under this scenario, if the householder has an alarm working over the UNI-D ports via an ATA then during a power failure they will lose connectivity. ***How will householders with alarms understand what to ask for of their RSP? How will RSPs be informed and be responsible for ensuring the householder is not exposed to a loss of connectivity to their alarm in the event of a power outage under this scenario?***

There is a wide range of information that a householder needs to be aware of in order to understand the implications when making decisions around selecting the most appropriate NBN RSP and power back up equipment. We would like to work closely with the NBN on developing the most appropriate consumer directed

communications to ensure our existing client base and vulnerable people in the community who need our services are not at risk.

With this in mind we would like to table the following recommendations for consideration:

1. Standards for installations be established and published to protect consumers who need and have medical alarms in their homes or places of residence.
2. The existing AS4607 standards are taken into account in the development of NBN installation standards for the protection of consumers with medical alarms.
3. The provision of a Free Call consumer hotline made available to assist with information and guidance for consumers with medical alarms.
4. NBN Co to provide and maintain a publically available up to date list of Retail Service Providers who offer UNI-V (Voice) port services (i.e. landline telephones over NBN) so consumers can make an informed choice about which NBN RSP can meet their needs.
5. As part of the standards - copper wires and POTS services are not decommissioned for consumers who have a medical alarm unless their RSP provides for Voice ports (UNI-V)
6. As part of the standards - the installation of a power pack and back-up battery to the UNI-V (Voice) ports are mandatory for all consumers identified as having a medical alarm.

We thank you for your considerations on this matter. We look forward to working cooperatively with the NBN Co. for the future support and protection of our clients.

Kind regards



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t/a Tunstall Healthcare