COMMUNICATIONS ALLIANCE LTD

INDUSTRY GUIDELINE

G652:2014

NBN MIGRATION MANAGEMENT

G652:2014 *NBN Migration Management* Industry Guideline

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INTRODUCTORY STATEMENT

The **NBN Migration Management** Guideline (G652:2014) is designed to document the roles and responsibilities of each relevant party, that is, Telstra (as copper network owner, a major telecommunications service wholesaler and a RSP), legacy network owners other than Telstra, RSPs, NBN Co, Medical Alarm Service Providers and Application Service Providers within the National Broadband Network migration process. The Guideline describes the process to support Customer management of the various Customer groups in relation to the migration of Customers on to the NBN. This may also include a Delegated Case Management process for the management of the subset of Customers whose RSP is unable to migrate their Customers to the NBN.

This version of the Guideline only applies to Fibre to the Premises (FTTP). The Working Committee will continue consideration of Fibre to the Node (FTTN) and Hybrid Fibre Coaxial (HFC) technologies for inclusion in the next version, documentation of which will commence in early 2015.

Technology agnostic issues that are still under consideration include the handling of premises with monitored medical alarms and delegated case management.

Background

The NBN is an Australia wide project to upgrade the existing fixed line phone and internet network and is essential for Australia's transition to a digital future. NBN Co Limited (NBN Co), a wholly-owned Commonwealth company, is responsible for delivering the NBN to all Australians on a wholesale-only, open access basis.

The structural separation of Telstra and the transition from existing networks to the NBN represents a significant structural change to the delivery of fixed line telecommunications services in Australia.

The extent of the change and the process of migration raise a number of potential risks in relation to the provision of some existing legacy services, in particular medical alarms connected to monitoring centres via existing copper networks.

Under Telstra's Migration Plan, approved by the Australian Competition and Consumer Commission (ACCC) in February 2012, Telstra is required to no longer supply most types of fixed line telecommunications services to retail Customers over its copper and HFC networks in areas where the NBN Co FTTP network has been declared RFS for 18 months.

As the NBN rollout occurs on a region by region basis, there is an 18 month period (migration window) from the date a region is declared RFS by NBN Co, until the Disconnection Date (DD) of the existing legacy copper network. During the migration window, most copper based services subject to disconnection will either be migrated to the NBN or be disconnected at the end of the 18 month migration window (some types of mostly business-related services known as 'Special Services' are subject to a different disconnection arrangement).

On 23 November 2012, the disconnection commencement dates came into effect for the first 15 rollout regions connected to the NBN Co fibre network. Retail voice and broadband services began migration to fibre from this time and in accordance with its Migration Plan, Telstra commenced disconnection of the copper network in these regions and other regions that have passed their Disconnection Date.

This Guideline draws on the migration experience of Telstra, NBN Co and industry with these early rollout regions.

Purpose of this Guideline

The existing 18-month migration period, with mandatory disconnection from Telstra's fixed networks at the end of that migration window, provides a solid framework for successful NBN migration. However, experience to date has shown that a successful migration ahead of mandatory disconnection will only occur if certain fundamentals, for example, serviceability of premises, retail product availability, Customer awareness, and industry participation, occurs early in the process.

The purposes of this Guideline are to:

(1)   set out for information purposes how the different tasks associated with migration to the NBN are allocated between the Industry Stakeholders involved in the process, including NBN Co, Telstra, RSPs, ASPs, MASPs, Customers and the Department;

(2)   document certain industry agreed practices, processes and solutions for Industry Stakeholders to undertake, to smoothly manage the migration of residential Customers and services (including medical alarms) to the NBN; and

(3)   provide a minimum set of standards for the provision of information by Industry Stakeholders to affected Customers in relation to the migration process to NBN.

The diagram below illustrates how industry-led arrangements set out in the Guideline fit within the broader migration policy framework and play a critical role in the migration and disconnection lifecycle. There are three key phases:

(1)   Phase 1: pre-RFS activities

(2)   Phase 2: migration window (RFS to DD)

(3)   Phase 3: post DD

This Guideline's primary focus is on Phase 2 (the migration window) although it does include some detail of activities in Phases 1 and 3 for ease of understanding the end to end migration process.
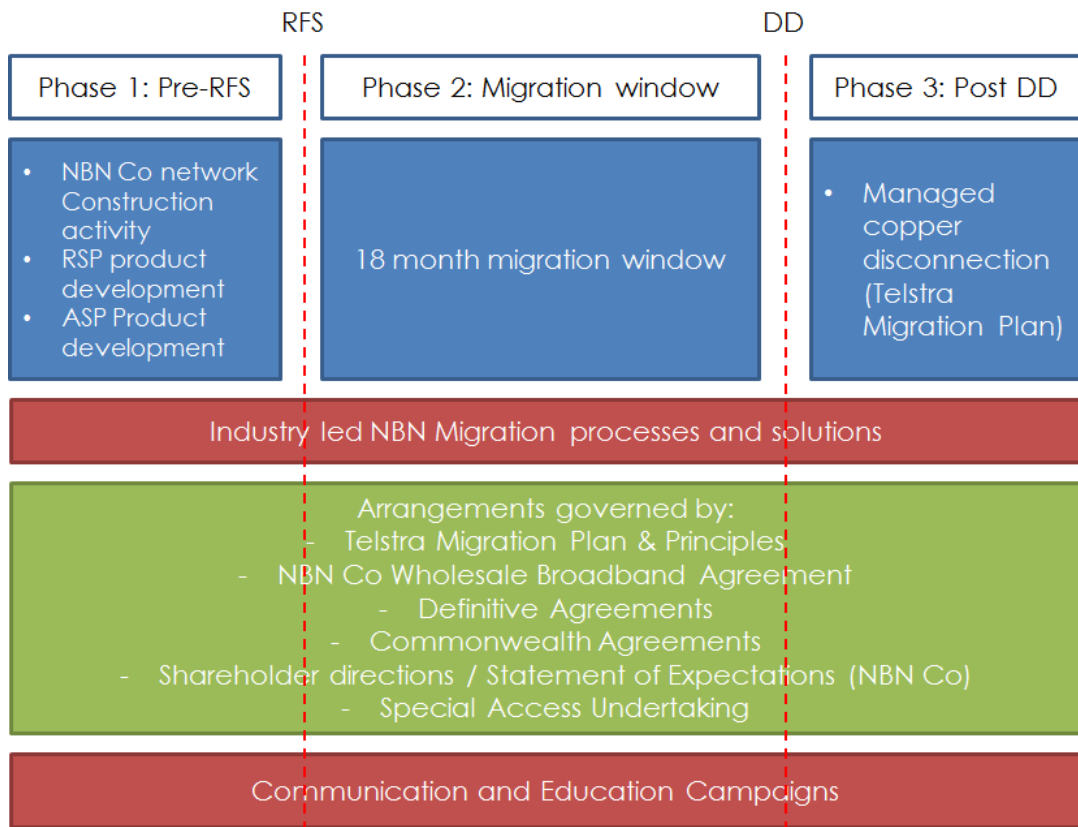
FIGURE 1
NBN Migration Management Lifecycle (FTTP)

Mike North
Chair
WC63 – NBN Migration Management Working Committee

DECEMBER 2014

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1 GENERAL

1.1 Introduction

1.1.1 This Guideline:

(a) sets out for information purposes the roles and responsibilities of each relevant party, that is, Telstra (as copper network owner, a major telecommunications service wholesaler and an RSP), RSPs, NBN Co, MASPs and ASPs within the NBN migration process (Chapter 3);

(b) documents certain industry agreed practices, processes and solutions for RSPs, ASPs and MASPs to undertake, in conjunction with NBN Co and Telstra, in order to smoothly manage the migration of Customers and services (including medical alarms) to the NBN (which may also include 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) (Chapter 4); and

(c) provides a minimum set of standards for the provision of information by RSPs and MASPs to their residential Customers in relation to the migration process (Chapter 5).

1.1.2 The Guideline is intended to take into account the Migration Assurance Policy (as issued by the Government from time to time) and the implications of any related Government decision-making for the migration process.

1.1.3 The development of the Guideline has been facilitated by Communications Alliance through a Working Committee comprising representatives from the telecommunications industry.

1.1.4 The Guideline should be read in conjunction with related documents and industry codes, including:

(a) The *Telecommunications (Migration Plan Principles) Determination 2011* and the *Telecommunications (Migration Plan - Specified Matters) Instrument 2011;*

(b) Telstra's Migration Plan, approved by the Australian Competition and Consumer Commission (ACCC) in February 2012, as subsequently varied;

(c) NBN Co's Wholesale Broadband Agreement;

(d) NBN Co's Special Access Undertaking, which was approved by the ACCC in December 2013;

(e) The revised Statement of Expectations issued to NBN Co by the Minister for Communications and Minister for Finance on 8 April 2014; and

(f) The *Telecommunications Consumer Protections* Code (C628:2012).

1.1.5　The Guideline should be read in conjunction with related legislation, including:

(a)　the Act;

(b)　the *Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth)*;

(c)　the *Competition and Consumer Act 2010 (Cth)*; and

(d)　the *Privacy Act 1988 (Cth)*;

1.2　Scope

1.2.1　The Guideline applies to the Carriage Service Providers section of the telecommunications industry under section 110 of the Act.

1.2.2　It deals with the following telecommunications activities as defined in section 109 of the Act:

(a)　carrying on business as a Carrier; or

(b)　carrying on business activities as a Carriage Service Provider; or

(c)　supplying Goods or Service(s) for use in connection with the supply of a Listed Carriage Service.

1.2.3　For clarity, the following matters are outside of the scope for this guideline (other than to the extent that they are included in the description of the various roles and responsibilities of stakeholders in Section 3):

(a)　Matters relating to Telstra's mandatory disconnection processes and other matters dealt with in Telstra's Migration Plan

(b)　Matters dealt with in the Definitive Agreements between Telstra and NBN Co

(c)　Matters dealt with in NBN Co's Special Access Undertaking

(d)　Contractual arrangements between NBN Co and its RSPs (i.e. governed by the WBA) and Telstra and its wholesale customers.

1.3　Objectives

1.3.1　The objectives of the Guideline are to:

(a)　identify all relevant stakeholders in relation to the copper to fibre migration process;

(b)　determine each stakeholder's role and responsibilities in the end-to-end migration process;

(c)   document an efficient industry process to ensure migration from copper to NBN will be performed with minimum disruption to Customer's service and with minimum cost imposition to the industry for this activity; and

(d)   outline the approach in relation to Customer management and communication through the migration process for each Customer group identified.

1.4   Guideline review

1.4.1   The Guideline will be reviewed in early 2015 to incorporate changes required for the Governments' multi-technology mix approach for NBN deployment.

1.4.2   Once the above review has been finalised, the Guideline will be reviewed every 5 years or earlier in the event of significant developments that affect the Guideline or a chapter within the Guideline.

2   ACRONYMS, DEFINITIONS AND INTERPRETATIONS

2.1   Acronyms

For the purposes of the Guideline:

ASP

Means Application Service Provider

BAU

means Business As Usual

DD

means Disconnection Date

HFC

means Hybrid Fibre-Coaxial.

HFL

means the Historical Footprint List

FSAM

means Fibre Serving Area Module.

MAP

means Migration Assurance Policy.

MAR

means Medical Alarm Register

MASP

means Medical Alarm Service Provider

NBN

means the National Broadband Network

PIM

means Public Information on Migration

PFL

means the Proposed Footprint List

RFS

means ready for service

RSP

means Retail Service Provider

SDT

means Soft Dial Tone

SQ

means Site Qualification

TUSMA

means the Telecommunications Universal Service Management Agency

WBA

means NBN Co's Wholesale Broadband Agreement

2.2   Definitions

For the purposes of the Guideline:

Act

means the *Telecommunications Act 1997 (Cth)*.

Application Service Provider

means a service provider providing an over the top service, such as a monitored medical alarm service. Medical Alarm Service Providers are a particular type of ASP.

Business Day

means a day commencing at 8.00 am and ending at 5.00 pm, other than:

(a)   a Saturday or Sunday; or

(b)   a day which is a public holiday in the place where work is required.

Carriage Service Provider

has the meaning given by section 7 of the Act.

Carrier

has the meaning given by section 7 of the Act.

Case Management

means RSP and MASP Customer management activities that are undertaken to assist the Customer migration to the NBN.

Customer

is the Customer or the Customer's authorised agent or representative, in whose name the account is established, or will be established, with an RSP for the supply of products or services for which the RSP requires the NBN.

Delegated Case Management

means Case Management where the functions are performed by a party other than the Customer's RSP or MASP.

Disconnection Date

means the date on which the existing legacy HFC and copper services are to be disconnected in accordance with Telstra's Migration Plan.

Historical Footprint List

means a list of all premises currently passed by the NBN.

In-flight Order

means an order that has been accepted by NBN Co after the Disconnection Date which has not been NBN connected.

In-train Order

means an order that has been accepted by NBN Co prior to the Disconnection Date which has not been NBN connected on the Disconnection Date (in accordance with Telstra's Migration Plan)

Legacy Services

means services that currently operate over the copper network, prior to migration to the NBN, including traditional voice and data services supplied using the public switched telephone network (PSTN) bandwidth and over the top services.

Managed Disconnection Service Profile

means the customer specific list of services (PSTN or ULL) provided by Telstra Wholesale to its Wholesale customers that details those Wholesale services which will be subject to managed disconnection.

Medical Alarm Register

means the NBN Co. established medical alarm register (located on the NBN Co. website at www.nbnco.com.au/medicalregister) that enables the registration of premises with medical alarms (both monitored or unmonitored). Two registration methods are available, the first as a public website where end users with medical alarms can register a premises where a medical alarm is present (including contact details of the person registering) and secondly, as an industry bulk registration method, where

medical alarm service providers can register the premises where they are aware of the presence of a medical alarm.

Medical Alarm Service Provider

means a provider of monitored medical alarms to Customers who are predominantly connected to monitoring centres via existing copper based public switched telephone networks.

Migration

means (in the context of the Guideline) the movement of a service from a legacy copper or HFC network to another network (e.g. the NBN).

Migration Assurance Policy

means the Migration Assurance Policy to be issued by the Minister for Communications following industry consultation.

Migration Window

means the period of time between NBN Co declaring a region RFS and its associated Disconnection Date.

Proposed Footprint List

means a list of all premises that are expected to be passed by the NBN within the next 6 months at any given time.

Special Services

has the meaning given to that term in the Telstra Migration Plan, approved by the Australian Competition and Consumer Commission (ACCC) in February 2012.

2.3   Interpretations

In the Guideline, unless the contrary appears:

(a)   headings are for convenience only and do not affect interpretation;

(b)   a reference to a statute, ordinance, code or other law includes regulations and other instruments under it and consolidations, amendments, re-enactments or replacements of any of them;

(c)   words in the singular includes the plural and vice versa;

(d)   words importing persons include a body whether corporate, politic or otherwise;

(e)   where a word or phrase is defined, its other grammatical forms have a corresponding meaning;

(f)   mentioning anything after include, includes or including does not limit what else might be included;

(g)   words and expressions which are not defined have the meanings given to them in the Act; and

(h)   a reference to a person includes a reference to the person's executors, administrators, successors, agents, assignees and novatees.

3   MIGRATION ROLES AND RESPONSIBILITIES

3.1   Overview

This section sets out for information purposes a description of the various roles and responsibilities of industry stakeholders at key milestones in the NBN migration process.

3.2   Industry Migration Responsibilities – Connection (Phase 1 & 2)

TABLE 1
Migration Connection Responsibilities

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
Stage 1	**Forecast RFS date** NBN Co provides a monthly RFS rollout plan which forecasts RFS dates approximately 12 months ahead of declaring a region to be RFS.	Approximately12 months ahead of RFS declaration (specific changes/updates can occur after this date)	NBN Co
Stage 2	**Declaration that a region is RFS** NBN Co declares the date when the region is RFS and this is the date that the copper disconnection will be based on. The Disconnection Date (DD) is	RFS date	NBN Co

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
	then set as the date 18 months from region RFS date.		
Stage 3	**Publicise that the region is RFS.** NBN Co will run public awareness activities to affected premises regarding NBN migration and the actions required to migrate. This communication will be supported by other relevant stakeholders in the industry such as Telstra, RSPs, ASPs, MASPs and community groups. NBN Co will provide key messaging for consistency in communications.	RFS date through to DD	NBN Co and other relevant Industry Stakeholders
Stage 4	**Identify impacted Customers.** The RSPs will identify the customers that can be serviced by the NBN based on the NBN rollout information, NBN coverage information and NBN serviceability information matched to the RSPs' own information.	RFS date through to DD	RSPs
Stage 5	**Conduct marketing campaigns**	RFS date through to DD	RSPs

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
	RSPs will run marketing campaigns targeting NBN serviceable Customers in the relevant region to encourage early NBN adoption.		
Stage 6	**Initiate NBN Migration** Assess Customer requirements, and order NBN-based retail service.	RFS date through to DD	RSPs
Stage 7	**Deliver NBN based service** NBN Co and RSPs will coordinate delivery of the NBN service with Customers (including specific installations performed at customer premises). NBN will deliver the layer 2 wholesale service that RSPs can use as building blocks to create their own retail NBN-based products and services and deliver these to Customers.	RFS date through to DD (or the connection of an in-train order post DD)	NBN Co (layer 2 wholesale service) and RSPs (retail service)
Stage 8	**Deliver medical alarm services where applicable** The MASP will work with Customers in ensuring that the	RFS date through to DD	MASPs

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
	medical alarms will continue to function following delivery of the NBN service and will work towards the resolution of any issues in relation to medical alarm implementation.		
Stage 9	**Initiate copper cancellation** Once a NBN service is delivered by both NBN Co (Layer 2 service) and the RSP (retail service), copper cancellation will be initiated by the RSP.	RFS date through to DD	RSPs
Stage 10	**Cancel copper services** In accordance with the Migration Plan, Telstra will action copper cancellation on receipt of an order to do so. All other associated processes in relation to the cancellation of copper such as ULL hand back and copper billing termination will also follow.	RFS date through to DD (also noting that cancellation orders for copper services may continue to be raised beyond DD e.g. for in train orders)	Telstra Wholesale

3.3 Industry Migration Responsibilities – Disconnection (Phase 2 & 3)

Table 2 outlines the current revised arrangements in place for FSAMs32 and beyond (for which the first Disconnection Date occurs on 20 February 2015) and may be different to the published Migration Plan, and thus is provided as a guide only and subject to change.

TABLE 2
Migration Disconnection Responsibilities

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
Stage 1	**Publish NBN Co region RFS rollout plan**		NBN Co
Stage 2	**Publicise the disconnection date** NBN Co will run public awareness activities to affected premises regarding NBN migration and the actions required to migrate. The activity needs to be supported by other relevant stakeholders in the industry such as Telstra, RSPs, ASPs, MASPs and community groups. NBN Co will provide key messaging for consistency in communications.	RFS date through to DD	NBN Co
Stage 3	**Notification of copper services due to be disconnected on DD**	DD-6 months	Telstra Wholesale

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	Telstra will publish a Disconnection Notification for copper services relevant to each RSP that are due to be disconnected on DD. This information will help the RSP to identify and verify the services that are pending disconnection. The list includes all services managed by the RSP as identified by Address, Location ID, Service ID and/ or FNN etc. This information is published on Telstra's portal.		
Stage 4	**Verify the disconnection list** The RSPs will check Telstra's disconnection list against its own information to ensure that they match and will resolve any mismatches in information with Telstra.	DD-6 months	RSPs Telstra Wholesale
Stage 5	**Inform Customers of pending disconnection by various stakeholders**	DD-6 months to DD	
	NBN Co will communicate to the affected Customers at a premises level (not a service level) of the pending copper	DD-6 months to DD	NBN Co

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	disconnection. This is done via various methods (see section 5.1).		
	The RSPs should contact Customers on the disconnection list via contact methods deemed appropriate by each RSP. The RSPs' should use reasonable endeavours to contact the Customer at least 3 times with clear messaging regarding the pending disconnection of copper.	DD-6 months to DD [At least 3 contacts]	RSPs
	TUSMA is responsible for contacting Customers who have voice only copper services to inform them of pending disconnection. This is done via mail.	DD-6 months to DD; [At least 2 contacts]	TUSMA
	MASPs will contact their Customers regarding copper disconnection which could potentially affect the Medical alarm services.		MASPs
Stage 6	**Provide In-train and In-flight Order information and**	No later than DD+5 Business Days	NBN Co Telstra Wholesale

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	Managed Disconnection Service Profile In accordance with the revised disconnection arrangements for FSAMs 32 and beyond, NBN Co will provide any In-train / In-flight Order information to Telstra after DD. Telstra will provide a Managed Disconnection Service Profile to RSP's (including Telstra Retail)if there are any active services remaining which are not In-train or In-flight Telstra will also send the RSP specific In-train / In-flight Order information.		
Stage 7	**Initiate temporary disconnection process** In accordance with the revised disconnection arrangements for FSAMs 32 and beyond, the active copper services remaining at DD (other than those on the In-train / In-flight Orders list) will be subject to temporary disconnection. Copper voice line rental	No later than DD+15 Business Days	Telstra and RSPs

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	services will have a soft dial tone applied (and for ULL services this will be applied by the RSP). SDT is applied as a final step to encourage Customers still relying on the copper service, to take immediate action to migrate to the NBN.		
Stage 8	**Provide updated In-train and In-flight Order information** NBN Co will provide Telstra with an updated list of In-train / In-flight orders, including those that have been placed from DD.	DD+26 Business Days	NBN Co
Stage 9	**Provide updated Managed Disconnection Service Profile and commence the managed disconnection of legacy copper service** In accordance with the revised disconnection arrangements for FSAMs 32 and beyond, Telstra will provide RSP's with an updated Managed Disconnection Service Profile and commence the managed	No later than DD+30 business days (to be completed no later than DD+45 Business Days)	Telstra Wholesale

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	disconnection of all eligible copper services within the relevant rollout region (other than those on the In-train / In-flight Orders list).		
Stage 10	**Monitor completed disconnections** RSP's will monitor their customer disconnections that have completed, through the disconnection profile provided by Telstra Wholesale.	Post disconnection	Telstra Wholesale RSP's

4 CUSTOMER MIGRATION PROCESS

Overview

This Chapter provides guidelines for migration and migration assurance processes in relation to all stakeholders involved in migrating Customers' services from copper to the NBN.

This guidance is largely based on the migration experiences of stakeholders in the initial NBN Co Fibre Service Area Modules (FSAMs). The aim of this guideline is to outline minimum activities that industry (including NBN Co RSPs, wholesale customers of legacy network operators who provide legacy services, MASPs and ASPs) should undertake when developing their own NBN Customer migration and management processes.

There are numerous parties who have a role to play in the migrating of services to the NBN and ensuring that Customers have been appropriately informed of the implications of the transition to the NBN. NBN Co (as the operator of the NBN), Telstra (as copper owner, a major telecommunications service wholesaler and an RSP), RSPs, MASPs and ASPs all have a role to play in migration activities.

The processes set out in this Guideline provide no guarantee that serious adverse consequences will be averted during the migration process. However, if followed, the guideline should minimise the likelihood of such consequences occurring. Clearly, each RSP, ASP and MASP must satisfy itself that its efforts are sufficient to successfully migrate their Customers to the NBN and manage any risks associated with the mandatory disconnection of their Customers remaining on the existing copper network at the DD. The objective of this guideline is to establish, with the Industry, the roles and responsibilities of all parties along with a benchmark for these migration processes and Customer management activities.

In order to allow Customers a sufficient amount of time to migrate to the NBN, an 18 month migration window has been prescribed from the FSAM RFS date to the mandatory DD for a particular region. During this period the Customer's RSP and MASP should make attempts to communicate with Customers and assist them in migrating to the NBN ahead of their DD, so they are not left without a working service at the end of the 18 month migration window.

The experience in the initial NBN FSAMs has highlighted the need to take extra care with certain categories of Customers as they migrate to the NBN. These additional activities are called out in the guideline under Customer management. The Guideline suggests that additional support may be provided to assist migration of customers with active copper lines and medical alarms. Priority assistance Customers are also identified as requiring special attention before and during the migration.

This chapter will define the responsibilities of RSPs, ASPs, MASPs, Telstra and NBN Co in the management of Customers, and some minimum steps that should be taken before the relevant DD. This guideline does not require an RSP, ASP or MASP to migrate their Customers onto the NBN; however, it does seek to set out the activities that should be undertaken to ensure a successful migration off the copper network.

All relevant stakeholders are encouraged to adopt the processes and arrangements set out in this chapter to minimise erroneous disconnections and to help Customer migration process.

4.1 End User migration assumptions and principles

4.1.1 Migration Assumptions

1. RSPs are responsible for their Customers and should take reasonable measures to manage their Customers' Migration during the18 month migration window to the NBN. Cancellation of any existing copper based services is the responsibility of the current RSP throughout the BAU Migration window.

2. RSPs do not have control or visibility over MASP and ASP supplied services.

3. ASPs and MASPs are responsible for their Customers and should take reasonable measures to manage their Customers' Migration, acknowledging that ASPs and MASPs do not have control or visibility over RSP supplied services.

4. The goal is to ensure there are no remaining active copper services without an In-Train or In-flight order at DD, unless the customer with that active copper services is happy for it to be disconnected without a fixed line replacement service.

5. If a Customer places an order for an NBN based service, they should not, through no fault of their own, lose access to existing copper based fixed line services until their NBN service has been connected (noting this should not be inconsistent with Telstra's timeframes and obligations to disconnect as outlined in Telstra's Migration Plan).

6. The minimum industry standard should be efficient and scalable.

7. NBN Co will announce a region as RFS, which will trigger the start of the 18 month migration window. Certainty around FSAM disconnection dates is required (without extension) to ensure industry focus.

8. At the end of the 18 month migration window, Telstra is required (under the Migration Plan) to disconnect copper and Telstra's HFC fixed line carriage services (other than exempt services). Exempt services include for example Special Services.

9. The Guideline should suggest process solutions to ensure Customer messages are consistent across all parties that may interact with Customers [compare to IGN 004 Appendix A, B and C "recommended messages"].

4.1.2   Customer Management Responsibilities

1.   **NBN Co**

NBN Co is responsible for:

(a)   the NBN rollout, providing information to RSPs concerning current and future NBN coverage areas and making premises serviceable. The details surrounding premises serviceability and corresponding information flows is contained in the WBA;

(b)   providing wholesale layer 2 services that RSPs can use as building blocks to create their own retail NBN-based products and services which are capable of supporting the migration of existing copper based services ahead of the commencement of disconnection of the relevant services;

(c)   delivering public information activities supporting NBN readiness including providing advance notification of the planned migration to affected residents and the actions required to migrate; and

(d)   in the case where an RSP opts out of managing a particular Customer, NBN Co (or another Authority) may refer the Customer to another RSP. Potential processes for references in these circumstances, including process owner, process timing and ensuring compliance with non-discrimination obligations, are currently being considered.

2.   **Telstra**

Telstra, as the disconnecting party, is responsible for:

(a)   publishing the Disconnection Schedule containing the disconnection dates for the relevant FSAMs;

(b)   communicating to its Customers regarding the Disconnection Date (including its Wholesale Customers); and

(c)   performing disconnection related activities as described in the Migration Plan.

3.   **RSPs**

RSPs are responsible for:

(a)   informing their customers of the impact, or likely impact, of NBN Migration and copper disconnection on their products and services;

(b)   educating their Customers of available product options as an alternative to the legacy telecommunications services being disconnected;

(c) migrating Customers to a product alternative as agreed with the Customer; and

(d) managing any billing, account management or other customer relationship issues associated with their own Customers.

RSPs who become aware that a Customer who is migrating to the NBN has a medical alarm should:

(e) encourage the Customer to contact their MASP to ensure that the medical alarm will continue to operate post-Migration; and.

(f) encourage the Customer to register on NBN Co's Medical Alarm Register before or as early as possible in the migration window.

Priority Assistance

RSPs are responsible for informing Customers whether they are able to offer Priority Assist service. For those RSPs who do offer Priority Assist service, they are responsible for informing the relevant Priority Assist Customers of the impact, or likely impact, of NBN Migration on their services.

Special Services

Where applicable, RSPs are responsible for identifying which of their existing services should be classed as Special Services (or Special Service Inputs) and certify those Special Services with Telstra Wholesale to ensure those services are exempt from mandatory copper disconnection. A full list of Special Services can be found at www.telstrawholesale.com.au/nbn/exemptions/index.htm

4. **Multiple RSPs**

Where Customers have different RSPs for voice and internet services, both RSPs will have responsibility for communicating with the Customer in relation to the product that they are providing.

5. **Non-NBN RSPs**

RSPs who are active in the current telecommunications market but are not providing (or do not intend to provide) NBN services are responsible for informing their Customers of the pending disconnection of their existing copper based services and the need to switch to an RSP who will be offering NBN services should the customer wish to maintain a service.

6. **ASPs**

ASPs are responsible for:

(a) safely migrating, and providing continuity of service for, their own Customers' services during the migration window;

(b) informing their own Customers about the impact, or likely impact, of migration on their services and premises;

(c) any installation or upgrading of wiring or Customer premises equipment associated with migration of their own customers (or Customer premises);

(d) any billing, account management or other customer relationship issues associated with their own Customers; and

(e) advising their customers of the features of services provided by RSPs that their services need in order to operate.

7. **MASPs**

MASPs are responsible for:

(a) informing their Customers about the impact, or likely impact, that migration will have on the operation and functionality of their medical alarm devices;

(b) registering their customers on the Medical Alarm Register before or as early as possible within the migration window; and

(c) taking reasonable steps to ensure that their products and services will work on the NBN post-migration.

8. **Medical Alarm Register Owner**

Where contact details have been provided, the Medical Alarm Register owner may contact individual registrations on the Medical Alarms Register to answer any questions and encourage them to contact their RSP and MASP.

5 INFORMATION MANAGEMENT

5.1 Overview

Approximately 3 years out from the declaration that an FTTP rollout region is RFS, NBN Co commences communication of forecast network rollout activities to RSPs and separately, via the Public Information for Migration (PIM), to Customers. The level of detail released, and its accuracy regarding construction timeframes, the location and number of premises to be served increases as the RFS date approaches.

NBN Co provides various rollout plans with increasing granularity to RSP's under an executed Wholesale Broadband Agreement (WBA). This supports forward planning for any required infrastructure support and awareness activity planning for existing Customer migration in these areas. The PFL provides early notice of the detailed future coverage area included in each rollout area and the HFL provides the list of premises which have already been declared RFS. The PFL is provided monthly and the HFL is provided weekly (or as updated by the terms of the WBA).

NBN Co determines serviceability based on its Site Qualification (SQ) system and where a premises is serviceable, RSPs are able to place connection orders.

This Guideline sets out the Customer migration processes and associated information management for NBN serviceable premises, that is, premises where an NBN Co wholesale service can be ordered by RSPs. Where a premises is not NBN Serviceable, that is outside the scope of this Guideline, the matter should be raised by the RSP to NBN Co, under the processes defined in the WBA.
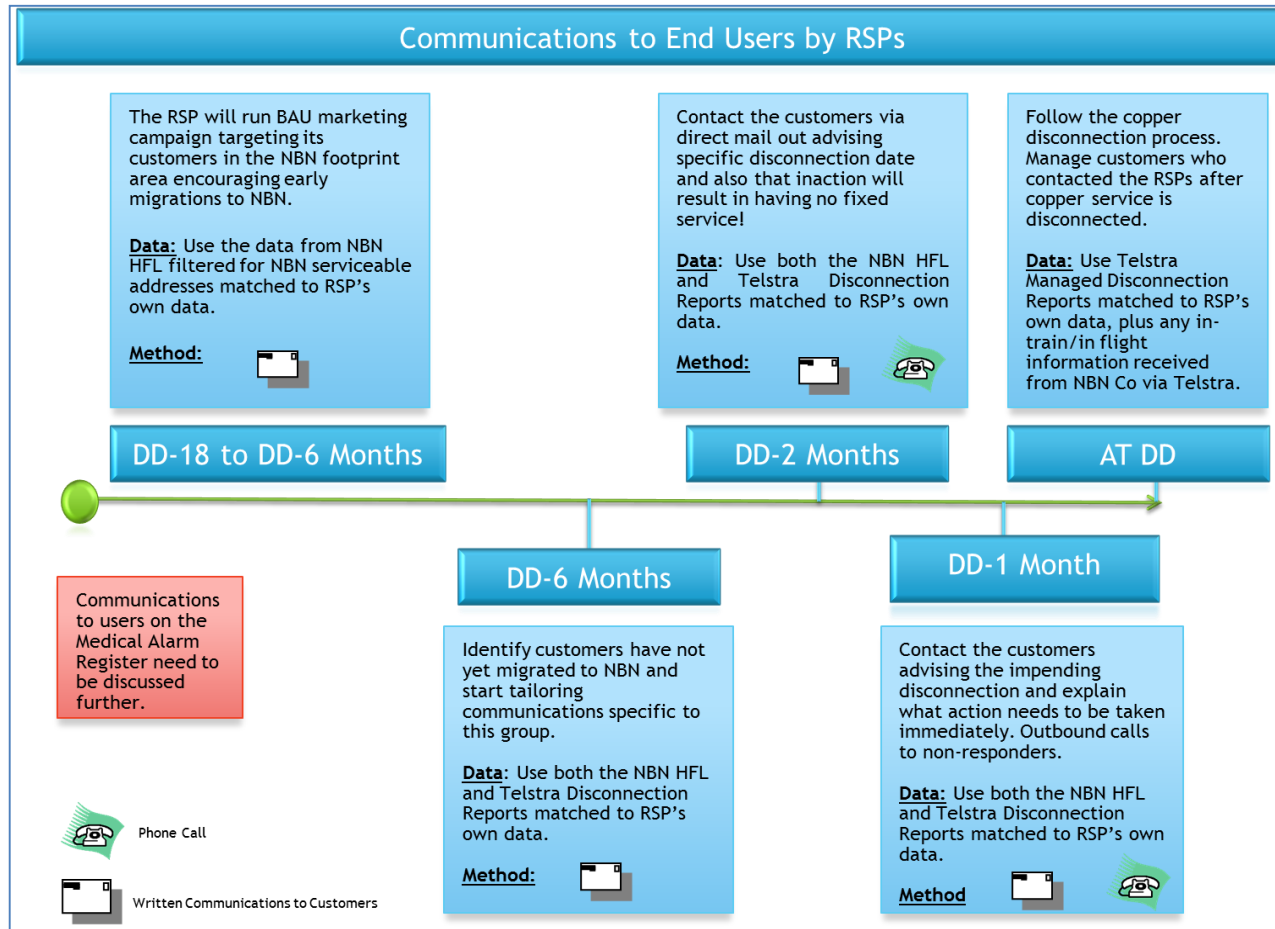
FIGURE 2
Customer Communications Timeline (RSP)

5.2 Information Management Requirements

5.2.1 Information provided by Telstra Wholesale to wholesale customers post RFS date:

(a) Disconnection Schedule – within 5 business days of NBN Co declaring a region RFS outlining the relevant disconnection timeline for each FSAM, including the cease sale and order stability commencement dates, and disconnection dates;

(b) wholesale disconnection notifications – details all copper based services still connected to the legacy network within an FSAM from DD-6 months. This list is updated regularly and is used by RSPs to manage Customers who are yet to migrate to the NBN;

(c) In-train / In-flight order information - received by Telstra from NBN Co and verified against Telstra Wholesale information and sent to relevant RSPs (including Telstra Retail, where applicable). Although Telstra can only inform those RSPs about In-train / In-

flight orders where those RSPs are the current copper service provider. [Details surrounding the process for non-Telstra copper gaining RSPs being advised on In-train / In-flight orders are yet to be agreed.]; and

(d)   Managed Disconnection Service Profile – as soon as practicable after DD, Telstra notifies each wholesale customer of any wholesale services supplied at Premises on the Managed Disconnection Service Profile that are to be disconnected in the course of Managed Disconnection during the Primary Disconnection Window.

5.2.2   Information provided by RSPs to Telstra Wholesale post RFS date:

(a)   certification of Special Services and special service inputs to be provided to Telstra Wholesale as these services are not subject to mandatory disconnection; and

(b)   providing Telstra Wholesale with requests to disconnect existing copper based services as per BAU process.

5.2.3   Information provided by Customers and MASPs to NBN Co:

(a)   Medical Alarm Register (MAR) registrations

It is currently the responsibility of Customers to individually register premises with medical alarms or for the MASPs to register premises where they are aware of the presence of medical alarms. NBN Co then provides this MAR information to Telstra Wholesale.

5.2.4   Information provided by MASPs to Customers:

(a)   communicating with Customers about their services and compatibility with the NBN-based RSP services; and

(b)   encouraging Customers to register premises with medical alarms on the MAR.

5.2.5   Information provided by RSPs to Customers post-RFS date:

(a)   appointment times where applicable;

(b)   alternative retail product and service information as replacement to legacy services; and

(c)   copper disconnection dates and process (from the Customer's perspective).

5.2.6   Information provided by NBN Co to Customers post-RFS date:

(a)   PIM / public awareness activity; and

(b)   communications to Customers on the MAR (where contact details are provided), should NBN Co be the ongoing owner of the MAR [this has not yet been decided].

5.3 **Allocation of Customer Communications Responsibilities**

TABLE 3
Customer Communications Responsibilities

Timeline	Required Communications	Method	Data	Responsible Industry Stakeholder
Pre-RFS date to DD	General awareness campaign	Online and other channels as required.	NBN Co region RFS rollout plan and other data	NBN Co
RFS date + 5 business days	In accordance with the Migration Plan, publication and communication of a disconnection schedule, setting out DD for all those rollout regions (upon the RFS date having been published by NBN Co).	Publish on Telstra's website and also inform RSPs directly through the BAU communications channel.	NBN Co region RFS rollout plan and announcement.	Telstra
RFS date to DD	Advance notification of NBN migration to end users who are on a service to be migrated, and the actions required to migrate.	NBN Co will run public awareness activities to affected residents. NBN Co will provide key messaging to relevant stakeholders in the industry such as Telstra, RSPs, MASPs, community groups for consistency in communications.	NBN Co region RFS rollout plan and announcement. Other relevant support groups' own data.	NBN Co Other relevant stakeholders
RFS date to	BAU marketing campaign targeting Customers in the NBN	Communication methods may vary between RSPs, may take the format of written,	Use the data from NBN published information filtered	RSPs

Timeline	Required Communications	Method	Data	Responsible Industry Stakeholder
DD-6 months	footprint area encouraging early migrations to NBN.	verbal, public advertising, internet advertising or any other methods.	for NBN serviceable addresses matched to RSP's own records.	
DD-6 months	Direct notification highlighting pending disconnection of copper to Customers.	Communication methods may vary between RSPs; written communication is recommended.	Use both the NBN published information and Telstra Disconnection Reports matched to RSP's own data.	RSPs
Between DD-6 and DD-5 months	Notification to voice only Customers.	Written communication.		TUSMA
Between DD-3 and DD-2 months	Notification to voice only Customers.	Written communication.		TUSMA
DD-2 months	Customers remaining on copper services are contacted to advise them of the specific DD and also that inaction will result in having no fixed service.	Communication methods may vary between RSPs, may take the format of written, verbal, public advertising, internet advertising or any other methods.	Use both the NBN published information and Telstra disconnection reports matched to RSP's own data.	RSPs
DD-1 month	Specific contact may be made with the non-respondent Customers advising them of the impending disconnection and explaining what action needs to be taken immediately.	Communication methods may vary between RSPs. An outbound call to all Customers on the disconnection list who has not taken any actions to migrate to NBN is recommended.	Use both the NBN published information and Telstra disconnection reports matched to RSP's own data.	RSPs

6 REFERENCES

Publication	Title
Industry Codes and Guidelines	
C628:2014	Telecommunications Consumer Protections Code
IGN 004	Industry Guidance Note – Migration of Back-to-Base Medical and Security Alarms to Fibre-to-the-Premises (FTTP) Open Access Networks – Considerations
Industry Documents	
Telecommunications (Migration Plan Principles) Determination 2011 and the Telecommunications (Migration Plan - Specified Matters) Instrument 2011	
Telstra's Migration Plan, approved by the Australian Competition and Consumer Commission (ACCC) in February 2012	
NBN Co's Wholesale Broadband Agreement and Special Access Undertaking, which was approved by the ACCC in December 2013	
NBN Co's Wholesale Broadband Agreement	
Legislation	
The Competition and Consumer Act 2010	
http://www.comlaw.gov.au/Series/C2004A00109	
The Privacy Act 1988	
http://www.comlaw.gov.au/Series/C2004A03712	
The Telecommunications Act 1997	
http://www.comlaw.gov.au/Series/C2004A05145	
The Telecommunications (Consumer Protection and Service Standards) Act 1999	
http://www.comlaw.gov.au/Series/C2004A00441	

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Communications Alliance was formed in 1997 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the *Telecommunications Act 1997* - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.