

Thursday 31 January 2012

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SUBMISSION: Migration plan required measures relating to the pull through connection process

About Tunstall

Tunstall is a provider of medical alarms, telehealthcare solutions and monitoring services to community care organisations, retirement villages, and 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.

Considerations for people, who are older, are vulnerable, have a long term health condition or live with a disability who use Priority Assist and/ or a medical alarm.

Tunstall applauds the recognition of vulnerable people using 'Priority Assist' and/or medical alarm devices as outlined in the ACCC Discussion Paper, December 2012, *Migration plan required measures relating to the pull through connection process*.

In response to some of the Issues for Comment posed in the discussion paper, Tunstall submits the following comments for consideration as follows:

6. Do the required measures provide assurance that wholesale customers of Telstra obtain and supply information to NBN Co regarding the existence of priority assistance and medical alert services?

No the required measures in our view do not provide sufficient assurance regarding wholesale customers providing appropriate information to NBN Co. It is our view that Wholesale customers of Telstra and the NBN Retail Service Providers (RSPs) should be provided with specific guidelines for the type of information to be collected and provided, including a Code of Conduct for the collection of such information, for



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example: Telephone Number. Location. Priority Assist Y/N. Medical Alarm Y/N, and number of existing phone handsets. Other essential Medical/Health device or service utilising existing phone line/internet _____.

8. Could the required measures be amended in any way to provide additional assurance that priority assistance and medical alert customers will be identified to NBN Co?

*Yes the required measure could be amended to provide additional assurance. A code of conduct should be developed for all Wholesales Providers of Telstra and RSPs to ensure they gather consistent information from their clients to determine their risk and if they are registered with priority assist and/or have a medical alarm or other health/medical device that utilises the current telephone lines or internet services for communication. This Code of Conduct should include a simple checklist to ensure that clients who require support and understanding have simple and informative questions to answer. In addition it must be implemented as part of the Code of Conduct that an RSP **will not** "offer" a service upgrade/platform change which may impact on the delivery of Medical Alarm and other health/medical services for the client.*

9. What other measures could be established to provide such additional assurance?

Other measures could include:

- the provision of specific questions to be included in an RSP contact which would capture information regarding clients who are 'Priority Assist' registered, use a medical alarm or use another medical/health device or service which uses the current telephone or internet service.*
- the provision of a "free" national consumer help line for people wanting to understand the risks of the pull through option and to seek other independent information regarding their potential NBN service. This service to be defined to support non-english speaking and elderly residents who may require supportive and simple information to be provided.*
- where there is no option except for pull through, the RSP provides a temporary mobile phone solution until service is re-established.*
- RSP and Medical Alarm industry agreement in relation to the minimum specification including CODEC and standards that an RSP must support and provision for a Medical Alarm client/resident.*

We thank you for your consideration on this matter. Should you wish to discuss the above please do not hesitate to contact me directly.

Kind regards



Lyn Davies
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t/a Tunstall Healthcare