
TELSTRA CORPORATION LIMITED

REPORT ON THE
COMMON “TICKET OF WORK” TASKS
UNDER THE
STRUCTURAL SEPARATION UNDERTAKING

SEPTEMBER 2012

Public version

Comparison of Common Tickets of Work

1) Executive Summary

As required by clause 16.5(a) of the Structural Separation Undertaking (SSU) submitted to the ACCC and accepted by it on 28 February 2012, this report is provided by Telstra to the ACCC. It:

- (i) identifies those Common Retail/Wholesale Job Tasks for which Telstra considers it is reasonably practicable (including weighing anticipated costs and benefits) to separately measure and compare its retail and wholesale performance; and
- (ii) sets out Telstra's proposed changes (if any) to existing Equivalence and Transparency Metrics or any new Equivalence and Transparency Measures in respect of those Common Retail/Wholesale Job Tasks.

Telstra has undertaken the analysis required in relation to clause 16.5 and considers that:

- those tickets of work that are most practical to compare between Regulated Services and their Comparable Retail Service are currently captured under the SSU;
- while one additional Equivalence and Transparency Metric has been proposed (see summary in section 4 below), the comparison is not perfect as the Regulated Service and Comparable Retail Service being compared, while subject to similar activation processes, do not follow the exact same steps; and
- given the difficulties of developing comparative metrics for wholesale services which do not have an identical retail offering and the Service Level Rebates already payable under existing metrics, payment of additional Service Level Rebates should not apply to any new metrics considered under section 16.5(a) of the SSU.

2) Key concepts

Common Retail/Wholesale Job Tasks are defined by the SSU as:

“job tasks undertaken by Employees working for the Network and Services Business Unit (i.e. —Ticket of Work level) which are common between Service Activation and Provisioning for each ULLS, DTCS and LSS and the relevant Comparable Retail Service.”¹

¹ Schedule 1, Dictionary.

The Comparable Retail Service for each of these Regulated Services is specified in Attachment B of the SSU:

Regulated Service	Comparable Retail Service
Unconditioned Local Loop Service (ULLS)	Basic Telephone Service – but only in relation to fault detection, handling and rectification.
Domestic Transmission Capacity Service (DTCS)	Megalink 2 Mbit/s Service
Line Sharing Service (LSS)	BigPond ADSL Layer 2 Service (ie. Layer 2 component of BigPond ADSL)

Service Activation and Provisioning is defined by the SSU as meaning:

“the process to provision a service undertaken by the Network Services Business Unit [(NSBU)] (and does not include any commercial terms, rebates, compensation or other commercial arrangements which may be offered by a Business Unit in relation to any service activation or provisioning). This process commences on acceptance or verification of an order by the Network Services Business Unit, may involve the making of appointments and ends on service activation.”²

3) Telstra’s Approach to the Analysis

The purpose of clause 16.5(a) was to identify whether there are comparable performance metrics between the three Regulated Services listed above and their relevant Comparable Retail Service which could usefully be used to indicate equivalence in the supply of these services, which are not currently provided under the SSU.

Currently, the service metrics for ULLS and LSS measure absolute performance against a designated fixed service level. For these Regulated Services, clause 16.5(a) requires Telstra to consider the feasibility of adding comparative service metrics to the existing absolute metrics.

For DTCS, however, the SSU already provides for comparative metrics with the Comparable Retail Service (Megalink). For DTCS, clause 16.5(a) therefore requires that Telstra consider the feasibility of additional comparable service metrics which would provide a check for equivalence not already provided by the existing comparative service metrics.

Having identified the Common Retail/Wholesale Job Tasks between each of ULLS, LSS and DTCS and their Comparable Services, Telstra has applied the following criteria in order to assess the utility of another metric based on these common tasks:

² Schedule 1, Dictionary.

- 1) We considered whether an **existing metric** already covered the Common Retail/Wholesale Job Task. If a newly identified common task is upstream from a task already covered by an existing metric (i.e. it is a step in the chain to the task measured by the existing metric), the utility of measuring the task separately is questionable. Any failure in the equivalence of the upstream step is likely to flow through to the downstream task which is being measured on a comparative basis. As Telstra is required to undertake a 'root cause' analysis of the reasons for the Reporting Variation in the downstream comparative metric, and report to the ACCC and the ITA, the contribution made by the non-equivalent performance of the upstream task will be uncovered and will need to be addressed to bring performance back into line downstream. Conversely, the non-equivalence in an upstream common task could be 'made up' in subsequent steps so that there is no Reporting Variance in the downstream task which is measured. However, since the downstream task is the key deliverable for the wholesale customer – such as meeting connection times – issues with upstream tasks are not relevant to assessing whether there is equivalence in the provision of the service. This is consistent with equivalence being measured on an equivalence of outcomes approach. Accordingly, measuring a common task upstream from a current metric would be superfluous.
- 2) We considered the **practicality of measuring** the Common Retail/Wholesale Job Tasks identified. Provisioning of a service usually involves a large number of tasks: some simple and straightforward, others more complex; many involving automated steps; some involving manual and partly manual steps; and many are aggregated together in single batches or job tasks across individual orders to maximise efficiency. For example, where jumpering is to be performed at an exchange, individual orders will usually be aggregated in a block for a single technician to perform. Telstra does not keep time records of specifying the initiation and completion of every task in the provisioning chain for each individual service, and to do so would serve little purpose and likely impede the efficiency of the task.
- 3) We then considered the **statistical validity** of measuring the Common Retail/Wholesale Job Task. For example, if there were significant differences in the volume of wholesale and retail orders to be compared, the validity of a comparative metric would be reduced (as fluctuations in the smaller volume would be disproportionate to those in the larger volume).

4) Results of our Analysis

We outline in sections 5-7 below additional Common Retail/Wholesale Job Tasks and proposed metrics according to each of the Regulated Services nominated in clause 16.5(a).

In summary, we propose as follows:

- **ULLS:** no additional metric. Having reviewed the common activation tasks applicable to ULLS and retail BTS orders, it is apparent that comparing the performance of those common tasks identified would not be practical and, more importantly, not provide an accurate measure of equivalence.
- **LSS:** the absolute metric for LSS already uses the same 3 business day activation period as the comparative metric used for BigPond ADSL and wholesale ADSL. As nearly all of the tasks in

provisioning LSS and BigPond ADSL are Common Retail/Wholesale Job Tasks, if the objective of achieving a relatively comparable metric for LSS is to be achieved, then it is most appropriately achieved by using and comparing these existing metrics. The comparison could be made by reporting in the event of a Reporting Variation between Metrics 8 (as applied to retail BigPond services) and 12.

- **DTCS:** no additional comparative metrics. The metrics provided under section 6 of Schedule 3 (and assessed for the Regulated DTCS service and Megalink pursuant to clause 16.1(e)) already capture those points in the provisioning of this Regulated and Comparable Retail Service that can be practically quantified and compared.

5) Unconditioned Local Loop Service

Under section 5 of Schedule 3 of the SSU, the metrics for ULLS measure:

- the percentage of ULLS Individual Cutovers completed on the Customer Required Date (**Metric 14**);
- the percentage of appointments for ULLS Individual Cutovers offered according to the Service Level (3 Clear Working Days or the Customer Required Date) – where there is an Intact metallic path at the relevant premises (**Metric 15**); and
- the percentage of Faults rectified within the Service Level (1, 2 or 3 Clear Working Days depending on exchange Band) (**Metric 16**).

Given the nature of ULLS, this Regulated Service does not have a direct equivalent in the retail services provided by Telstra. The SSU provides that:

for the purpose of Fault Detection, Handling and Rectification only, the comparable retail service is the component of the Basic Telephone Service comprising a continuous metallic twisted pair between a Telstra local exchange MDF and the network boundary point at an end-user premises.

Adding to the complexity of comparing ULLS with a relevant retail service, there are a range of ULLS provisioning sub-categories. The term ULL Individual Cutover referred to in the SSU does not distinguish between these sub-categories, but the distinctions are relevant when determining a comparable service for the purposes of Service Activation and Provisioning. These sub-categories are:

Vacant Unconditioned Local Loop (VULL): The provision of ULLS using a vacant communications wire. The field activity involves a CAN path being built from the Point of Interconnect (**POI**) pair in the exchange to the Network Boundary Point (**NBP**) at the end user's premises. The NBP for ULLS could be either: the A side of the customer's Main Distribution Frame (**MDF**); a Network Termination Device (**NTD**); or the end user's first socket. The Communications Technician (CT) is required to Tag at the A side of the end user's MDF or terminate the service at the NTD or first socket. Jumpering at the exchange is required but it is also often necessary to undertake work at the end user premises or along the copper line between the exchange and the premises.

Enhanced Vacant Unconditioned Local Loop (eVULL): Similar to VULL in that it uses a vacant communications wire, but eVULL will only require jumpering at the exchange as the remainder of the service path is intact (from the exchange to the MDF or first socket). For every eVULL Telstra will have to jumper from the POI pair at the exchange to our mainframe. No end user premises visit is required.

In Use Unconditioned Local Loop (IULL): This is the provision of ULLS using an in-use communications wire. The field activity involves an exchange jumper being cut over from an in-use PSTN service, which currently provides a Telstra PSTN service to a customer. No customer premises visit is required. For every IULL Telstra will have to jumper from POI pair at the exchange to our mainframe. No end user premises visit is required. The Communications Technician (**CT**) is required to notify wireline activation for the cancellation of the existing PSTN service, though the CT can clear the ticket of work (**TOW**) once jumpering at the exchange is completed.

Diversion Unconditioned Local Loop (DULL): The provision of ULLS which uses an In Use Communications Wire, together with a request that Telstra provide a Call Diversion service for 30 calendar days. The field activity required is an exchange jumper being cut over from an in-use PSTN service, which currently provides a Telstra PSTN service to a customer. For every DULL Telstra will have to jumper from POI pair at the exchange to our mainframe. No end user premises visit required. This is the same as IULL except for the requirement of a diversion.

Transfer Unconditioned Local Loop (TULL): where an access seeker (Access Seeker A) requests a transfer of an in-use ULLS from another access seeker (Access Seeker B). The field activity required is an exchange jumper being cut over from an in-use ULL service, which currently provides a ULL service to Access Seeker B. No end user premises visit required.











(a) Common Wholesale/Retail Tasks

(i) ULLS compared with Retail BTS which have a T20 Requirement

The retail Basic Telephony Service (**BTS**) has been identified as the most Comparable Retail Service to ULLS with respect to faults. But comparing BTS and ULLS at the activation stage is more difficult, particularly given that jumpering of the service at the exchange or premises may or may not be required.

There are categories of BTS connections which identify the tasks associated with the order. Those tickets of work allocated with the code T20 will require jumpering at the exchange (**BTS T20**), those allocated the code T30 will require a field task (**BTS T30**), and those allocated the code T40 will require a premises task (which may include jumpering at the first socket or Main Distribution Frame) (**BTS T40**).

The table below summarises the exchange jumpering, field and premises activities applicable to BTS T20, BTS T30, BTS T40 and each ULLS subcategory. A more detailed breakdown of tasks required for each order is provided in Appendix 6.

Metric	BTS T20	BTS T30 (field task)	BTS T40 (premises task)	VULL	eVULL	IULL	DULL	TULL
Jumpering at exchange		May be required	May be required					
Field Task			May be required					
Premises Task								

As is apparent from the above table, ULLS and BTS can involve different tasks to be undertaken depending on the type of ULLS service to be provisioned (for ULLS) and the particular tasks to be undertaken in order to supply BTS to a retail customer. There is no one task that must be undertaken in respect of all BTS and ULLS orders. If one compares the tasks that are required to provision a sub-category of each of the services, jumpering at the exchange is a Common Retail/Wholesale Job Task as between BTS services with a T20 requirement and each ULLS category. The field and premises tasks occurring on BTS T30 and T40, however, are not generally common, and will only apply to the VULL category of ULLS. It should also be noted that the nature of a field or premises task may vary substantially, whereas jumpering at the exchange can generally be expected to require similar levels of work (for each order) from the perspective of an attending CT.

On the basis of the above, the only potential comparison for consideration would be between the sub-set of retail basic telephony services and ULLS categories that only have a T20 requirement. While Telstra can identify those services, there are a number of reasons that a metric based on this common task would not be a useful guide as to whether there was equivalence in the provisioning of wholesale and retail services:

- while jumpering at the exchange is the key task for retail BTS and ULLS services that only have a T20 requirement, there are concerns with seeking to time and compare the jumpering task itself (see section 5(a)(ii) below);
- the alternative measure is comparing whether those services (which only require jumpering at the exchange in terms of field tasks) are provisioned within the Customer Required Date (**CRD**). A comparison of orders meeting the CRD is complicated, however, by the different mandatory connection timeframes applicable to BTS and ULLS services (see section 5(a)(iii) below);
- measuring a subset of BTS services against a subset of ULLS services does not necessarily provide a true reflection of the performance of these services overall, and we are not in a position to understand the drivers behind our performance on these services on a

comparative basis. It is therefore not clear to Telstra whether it is valid to compare performance of the services over time;

- it is unclear what effect a comparative metric between BTS and ULLS services would have on existing metrics applicable to these services. For example, would an emphasis on meeting the CRD for retail BTS services undermine the equivalence of retail and wholesale BTS services?; and
- in a given quarter, the retail BTS tickets of work that are designated as BTS T20 are significantly smaller in quantity than eVULL, IULL, DULL and TULL tickets combined. Therefore, any results from the metrics would likely suffer the proportionality issue (discussed above), in that fluctuations in the calculations for retail BTS services that have a T20 requirement only may be disproportionate to fluctuations in ULLS calculations. A summary of the retail BTS services with T20 volumes (excluding Priority Assistance orders) compared with ULLS volumes (excluding VULL orders) is provided in the table below.

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Given the difficulties in comparing these services, Telstra does not consider that a metric comparing BTS and ULLS services that only have a T20 requirement will provide an accurate reflection of equivalence in the activation of these services.

(ii) Standalone Metric for Jumpering

Telstra has considered the practicality of isolating and measuring the time taken to jumper retail and wholesale services. Technicians do not currently complete timesheets recording start and completion times for exchange jumpering work they do – for retail or wholesale services. It would be difficult to do this on a per service basis because a technician, for efficiency purposes, is usually given a number of jumpering jobs to do during each visit to an exchange. The technician completes these as a single series of tasks. It would be impractical to require the technician to start and stop to record the time and whether the service is a retail or wholesale service for each individual line the technician jumpers.

As jumpering is a step in the process to connection, the comparative measure of importance to the wholesale customer is whether Telstra delivers the requested service on the day they

anticipated, not whether a particular sub-task within the total task is delivered equivalently. The performance of jumpering for retail may be relevant to selecting the correct retail provisioning process for the purposes of a comparison (so that there is an ‘apples with apples’ comparison) but it is not necessary to measure jumpering on a standalone basis to determine whether the compared retail and wholesale processes are equivalent. Measuring jumpering on a standalone basis would be using a standard of equivalence of inputs and not equivalence of outputs – contrary to the structure and intent of the SSU commitments.

(iii) Provisioning completed prior to Customer Required Date

Telstra has also considered whether it is possible to compare the completion of those service orders which only require exchange jumpering (BTS versus eVULL, IULL, DULL, TULL) by a specified date. Specifically, is it possible or useful to measure the proportion of retail BTS and ULLS services which only have a T20 requirement, which met the CRD?

In addition to the issue of order volumes identified above, this comparison is problematic as a CRD may occur earlier than the mandatory connection timeframe applicable to the completion of the relevant retail BTS and ULLS services. A metric that measured the completion of service connections within the CRD for these orders would not be aligned with the requirements of Metrics 2 and 3 - which measure Telstra’s compliance for BTS services with mandatory timeframes under the *Telecommunications (Customer Service Guarantee) Standard 2011 (CSG Standard)* as opposed to the CRD.

It is then necessary to consider those services where the CRD falls after the mandatory timeframe. Under the CSG Standard, BTS orders are subject to completion within a minimum of 5 working days (urban areas), 10 working days (major and minor rural areas) or 15 working days (remote areas) - or later if requested by the customer. These timeframes do not apply when there is insufficient network or capacity to connect the service.

Although there is a reasonable fit between these BTS timeframes and those applied to ULLS orders under the *Unconditioned Local Loop Service – Ordering Provisioning and Customer Transfer Code (C569: 2005) (ULLS Code)*, this is not exact. Under the ULLS Code, Access Seekers must select a cutover date which is between 10 and 30 working days from the date of cutover notification (rural and remote areas) or between 5 and 30 working days (for other areas). In urban and rural areas, therefore, the minimum mandatory connection timeframe is the same between BTS and ULLS orders, though this is not the case for orders in remote areas.³ Additionally, Metric 15 places on Telstra an incentive to establish CRDs (for Band 1 and 2 exchanges) that are within 3 working days of receiving the request.

As a result, even if CSG timeframes were used as the CRD for those retail BTS services that only had a T20 requirement where the actual required date fell before the CSG requirement, CRDs for these retail BTS services and the relevant ULLS services are still subject to different

³ See section 11.10.2-3 of the *Unconditioned Local Loop Service – Ordering Provisioning and Customer Transfer Code (C569: 2005)* and section 8 of the *Telecommunications (Customer Service Guarantee) Standard 2011* and Telstra’s *USO Policy*

mandatory timeframes. Comparing compliance with CRDs would not therefore provide a like-for-like comparison.

(iv) ULLS compared to ULLS winback

In past discussions, the ACCC has raised the possibility of a comparative metric between ULLS and situations when Telstra wins back ULLS lines (reconnected either as retail or wholesale telephony services). Telstra considered using this comparative metric but believes it would be impractical for the following reasons:

- even with the rising number of ULLS, the number of reconnections is relatively small (see table below);
- the available sample is further reduced because Telstra has a policy of reverting ULLS on cancellation or termination by the wholesale customer as a default setting (ie. we will reconnect the copper line to the Telstra network without waiting for an order for a Telstra service from a retail or wholesale customer). We have no specified timeframe within which these reconnections are done – they are performed when we have available technician time between orders. These reconnections would need to be excluded from any comparative metric as they are not driven by the requirement to fulfil a retail or wholesale order, further reducing the available pool for measurement; and
- given the small numbers involved, the winback process for ULLS is a largely manual, paper based process compared to the largely automated process for ordering ULLS. It would be resource intensive to require time sheet management in this process and we do not believe it would produce a useful comparison of equivalence (it is likely to be slower than ULLS provisioning).

The table below sets out the variation in numbers for the ULLS connections vs ULLS winback over the four month period from April to July 2012. Given the factors mentioned above, and the great variation in numbers, Telstra does not believe that a metric comparing ULLS winback with ULLS activation is appropriate at this time.

Connection Type	April 2012	May 2012	June 2012	July 2012
VULL	CIC	CIC	CIC	CIC
eVULL, IULL, DULL, TULL (excluding ULLS Winback)	CIC	CIC	CIC	CIC
ULLS Winback	CIC	CIC	CIC	CIC

For completeness, we include in Appendix 7 a detailed breakdown of the tasks involved as between VULL and ULLS winbacks.

6) Line Sharing Service

Under section 4 of Schedule 3, the metrics for LSS measure:

- The percentage of LSS orders completed within the Service Level (3 clear working days) (**Metric 12**); and
- The percentage of faults on LSS rectified within the Service Level (1, 2 or 3 Clear Working Days depending on location of service) (**Metric 13**).

The SSU provides that the Comparable Retail Service for LSS is Telstra's BigPond ADSL Layer 2 Service. It is noted that provisioning of the Layer 2 component of a BigPond ADSL service is not a separate process from provisioning the BigPond ADSL Layer 3 service.

(a) Common Retail/Wholesale Job Tasks

Appendix 9 compares the tasks involved in provisioning an LSS service and a BigPond ADSL Layer 2 service. Tasks in the provisioning of the Regulated and Comparable Retail Service are generally common, with the two key differences being:

- following jumpering of the main cable pair (step 10 in Appendix 8), CTs are required to check for port sync at the main cable pair for BigPond ADSL Layer 2 services but not for LSS; and
- the completion of BigPond ADSL Layer 2 orders is subject to activation of the service (not only completion of the CT field work), whereas completion of LSS orders is not subject to this activation step. Activation of LSS services is undertaken by the wholesale customer.

The wholesale ADSL provisioning process is also similar to that for the BigPond ADSL Layer 2 service - except for the port sync step.

This high level of Common Retail/Wholesale Job Tasks may allow a 'triangular' comparison between:

- (a) retail **and** wholesale ADSL; and
- (b) Bigpond ADSL Layer 2 **and** LSS.

We are already measuring (a) on a comparative basis under Metric 8. While the provisioning of LSS is currently captured in an absolute metric (Metric 12), its parameters are similar to those for retail/wholesale ADSL – including a designated 3 day lead time between customer order and completion of provisioning. We have therefore investigated the potential for matching these existing metrics and have concluded that providing a comparison of LSS and BigPond ADSL Layer 2 provisioning may be appropriate, without the need to build a new metric.

(b) Proposed metrics

In order to compare the jumpering of LSS and BigPond ADSL Layer 2 services, existing Metric 12 may be compared with existing Metric 8 - as applied to retail services only. Metrics 8 and 12 are extracted below.

Metric	Measure	Service level (where applicable)
8	The percentage of services provisioned within Service Level – where the customer or end-user has an existing and functioning basic telephone service capable of supporting ADSL services.	3 Clear Working Days from date entered into Telstra's provisioning system.
12	The percentage of LSS completed within Service Level.	3 Clear Working Days

Implementation of this comparison would require some adjustment to provide that the Reporting Variation requirements of 16.2 of the SSU applied between Metrics 8 and 12, as well as between retail and wholesale ADSL services covered by Metric 8.

7) DTCS

Under section 6 of Schedule 3, the metrics for DTCS relevantly measure:

- The percentage of Category 1, 2 and 3 DTCS orders provisioned on or by the Service Level (**Metric 17**); and
- The percentage of Faults rectified within the applicable Service Level (**Metric 18**)

Pursuant to clause 16.1(e), Metrics 17 and 18 compare Telstra's performance in provisioning both DTCS and Megalink as the Comparable Retail Service.

Once orders have entered Telstra's provisioning systems, DTCS and Megalink are subject to the same provisioning workflow process, and there is no differentiation in treatment of wholesale or retail orders. Upon receipt of either a DTCS or Megalink service order, the Amcor system allocates priority to an order based on the order in which it is received, and the works required. The process is captured in Appendix 6, and a summary of the order categories that are applied is provided below.

There are four categories of service provisioning used by NSBU (and NSBU contractors) to classify (on an equivalent basis) retail and wholesale orders depending on available infrastructure:

(a) Category 1

A Category 1 order requires no external plant installation and may include minor work at the customer or exchange ends, which can be completed at the same time as the visit to install jumpers. This minor work may include:

- installation of basic terminal equipment (e.g. NT1's or router); or
- inserting of customer and exchange cards into free slots.

The timeframes between acceptance of order and service ready and are 9 days for **metro areas** and 19 days for **country areas**.

(a) Category 2

A Category 2 order may require:

- in a **metro area**, limited external plant work that can be carried out as maintenance activities (no formal access notification required). This can be jointing and hauling up to 500m where no formal notification is required (such as hauling where an MOU exists, or where the customer is the building/property owner) or the jointing of fibres in an existing cabinet or rack;
- in a **country area**, up to 500 metre of fibre haul work;
- an internal build which is limited to sub rack installations only; or
- a copper service on existing infrastructure.

The timeframes between acceptance of order and service ready are 19 days for **metro areas** and 39 days for **country areas**.

(b) Category 3

A Category 3 order is for work in **metro areas** that requires limited external plant work that can be carried out as a maintenance activity and where formal notification for land and/or building access is required to local councils, utilities or building manager/owners where no MOU is in place. It does not apply any work where an ISA is required.

The timeframes between acceptance of order and service ready and is 24 days.

(c) Category 4

A Category 4 order is for work where an ISA notification and response is required and includes:

- a major installation of CAN transmission infrastructure;
- greater than 500m of fibre hauled and any network conduit installed; and
- formal notification required for land and/or building access to local councils, utilities or building manager/owner.

The timeframes between acceptance of order and service ready are based on the timeframe quoted to the customer.

Telstra considers that the Common Retail/Wholesale Job Tasks between DTCS and Megalink, and the appropriate metrics for measuring equivalence in the provisioning of these services, have already been captured in the SSU. Given that the existing Metric 17 compares the completion of wholesale and retail service provisioning, there appears to be no added value in measuring individual tasks along the way. Further, as discussed in section 1 above, the root cause analysis we are required to undertake when variance thresholds are triggered will lead to any systematic issues being identified at the subroutine level.

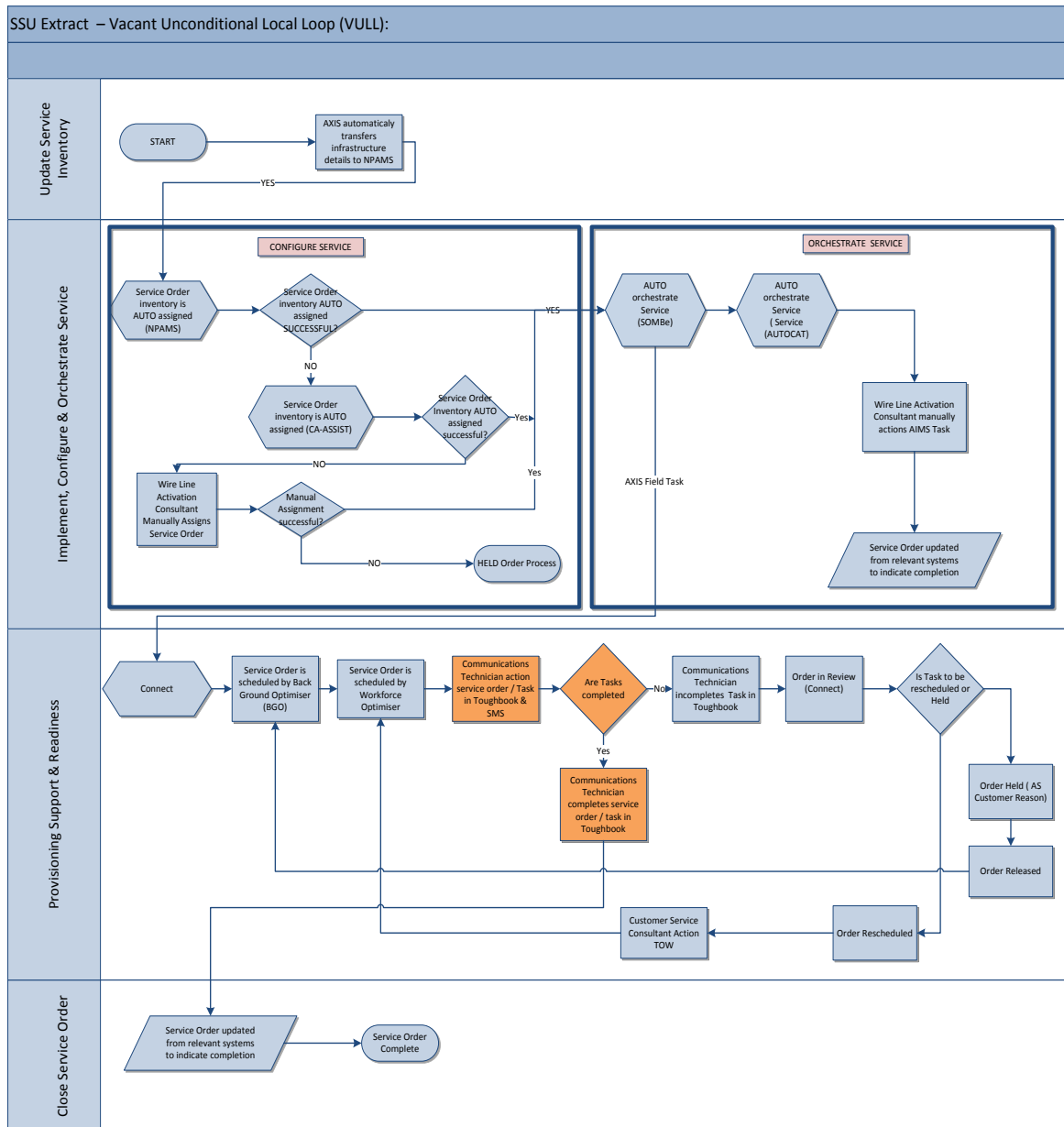
8) Service Level Rebates not applicable

As mentioned earlier, Telstra believes the existing set of metrics contained in the SSU should be sufficient. However, if the proposed LSS measurement discussed in section 6 above is considered useful by the ACCC, Telstra believes that Service Level Rebates should not apply to this measure.

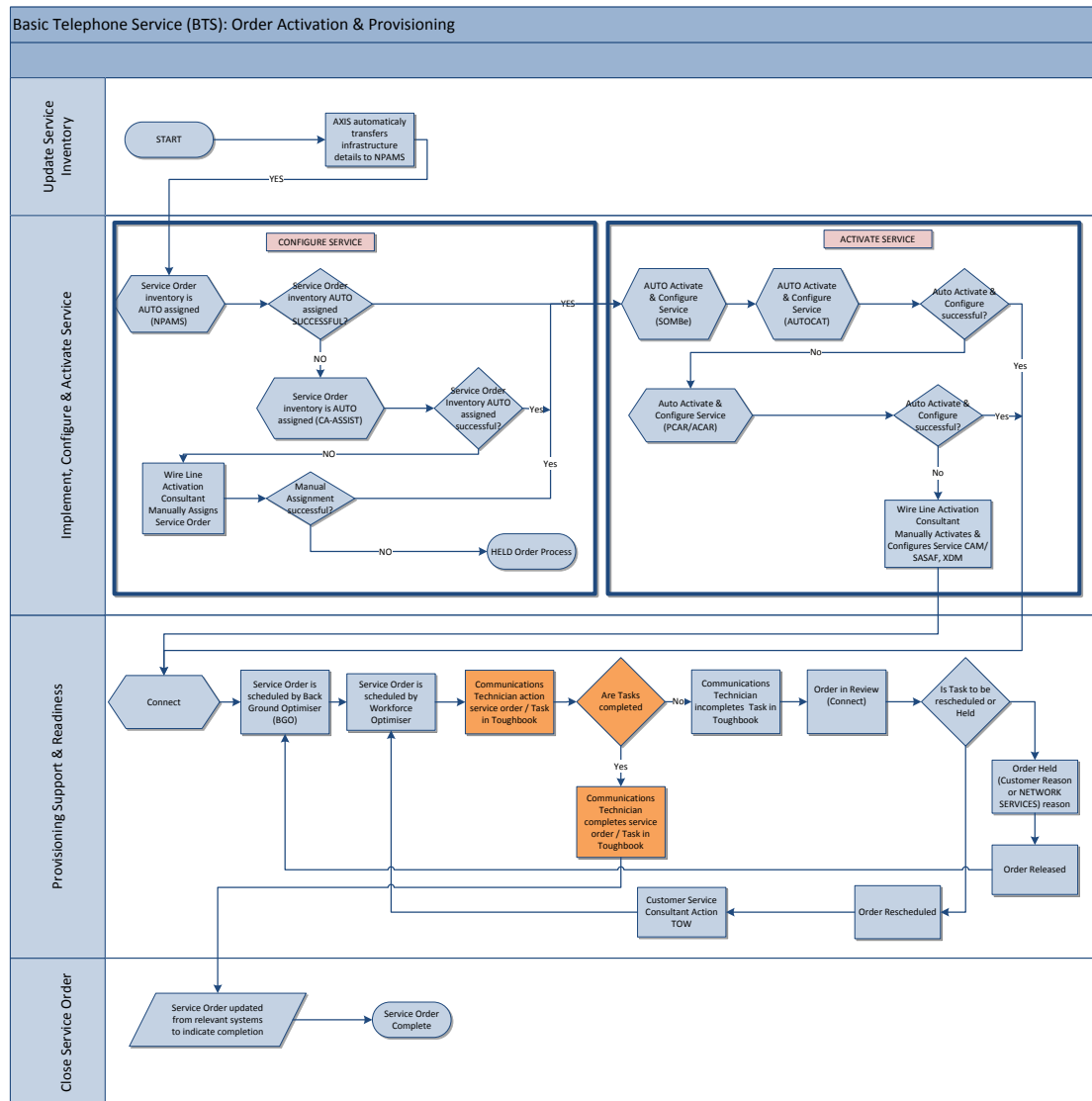
The differences in LSS and BigPond ADSL Layer 2 provisioning do not on their face appear so substantial as to cause an increase in the time taken to provision either service. However, it remains the case that variables exist between these activation processes – and may at some stage be responsible for differences in completion times. Telstra is not in a position to fully understand these differences at this point in time. As such, even if this comparison is considered useful, Telstra believes that Service Level Rebates should not apply to the comparison of these metrics. Not only is the comparison imperfect, but there may be additional variables that are not currently apparent but emerge following continued analysis of the provisioning processes.

In addition, Telstra is already required to pay Service Level Rebates in respect of ADSL and LSS provisioning where that the service levels for existing Metrics 8 and 12 are not met. Any additional Service Level Rebate based on a comparison of these metrics could therefore result in multiple service level payments for the same provisioning tasks. It is also not clear whether this would drive inconsistent incentives across the metrics.

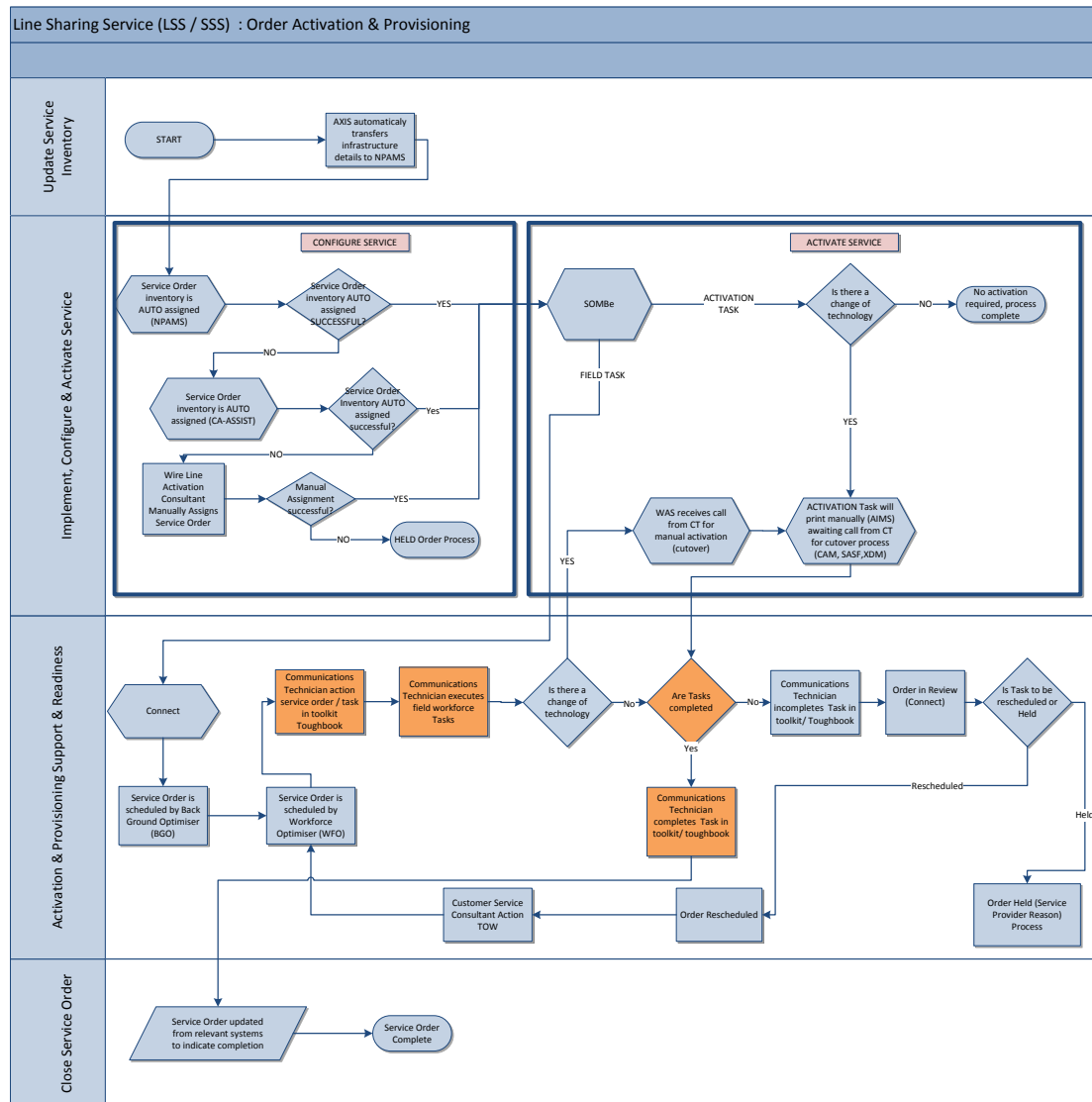
Appendix 1: VULL - Service Activation and Provisioning process diagram (see level 3)



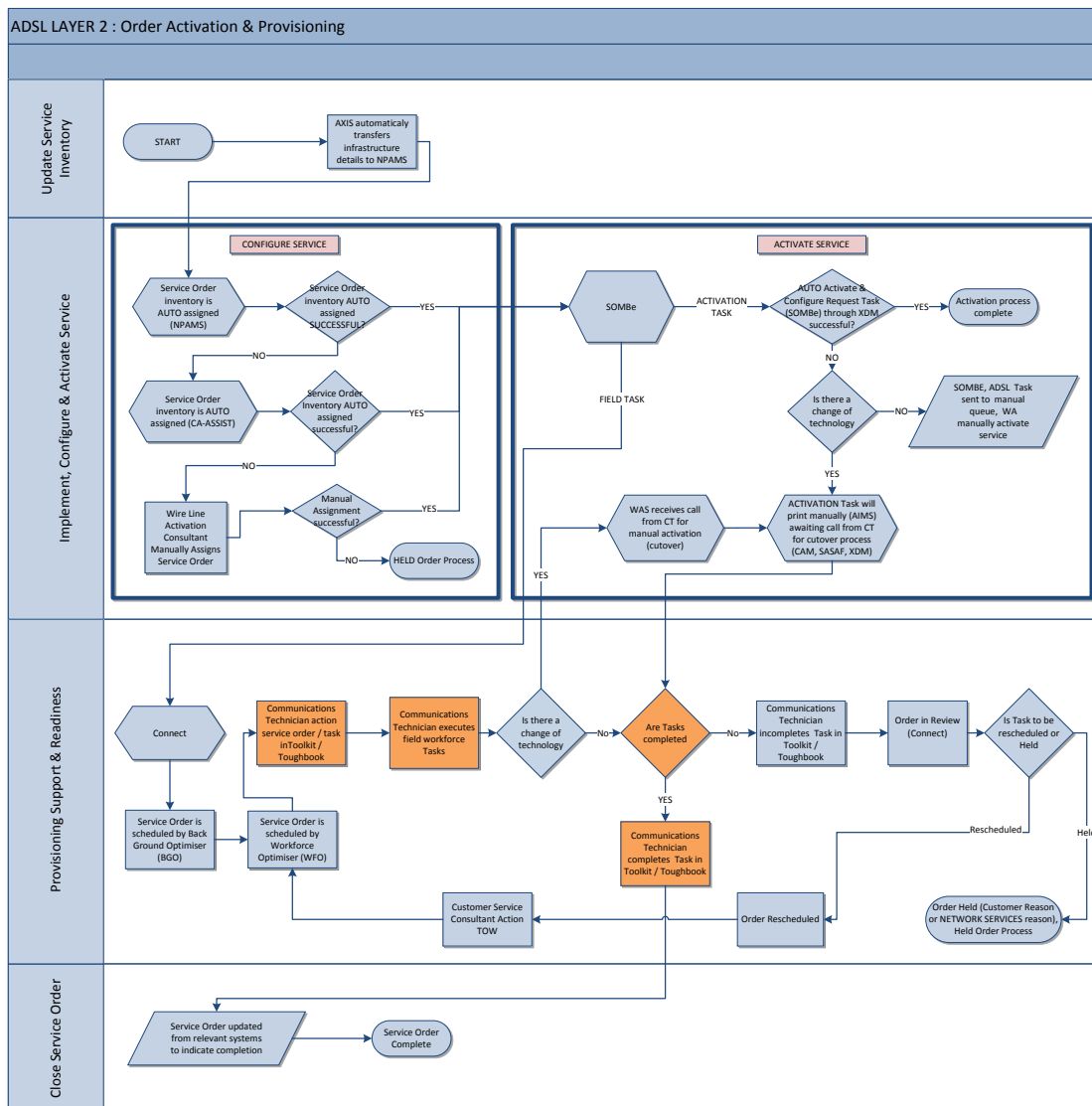
Appendix 2: BTS - Service Activation and Provisioning process diagram (see level 3)



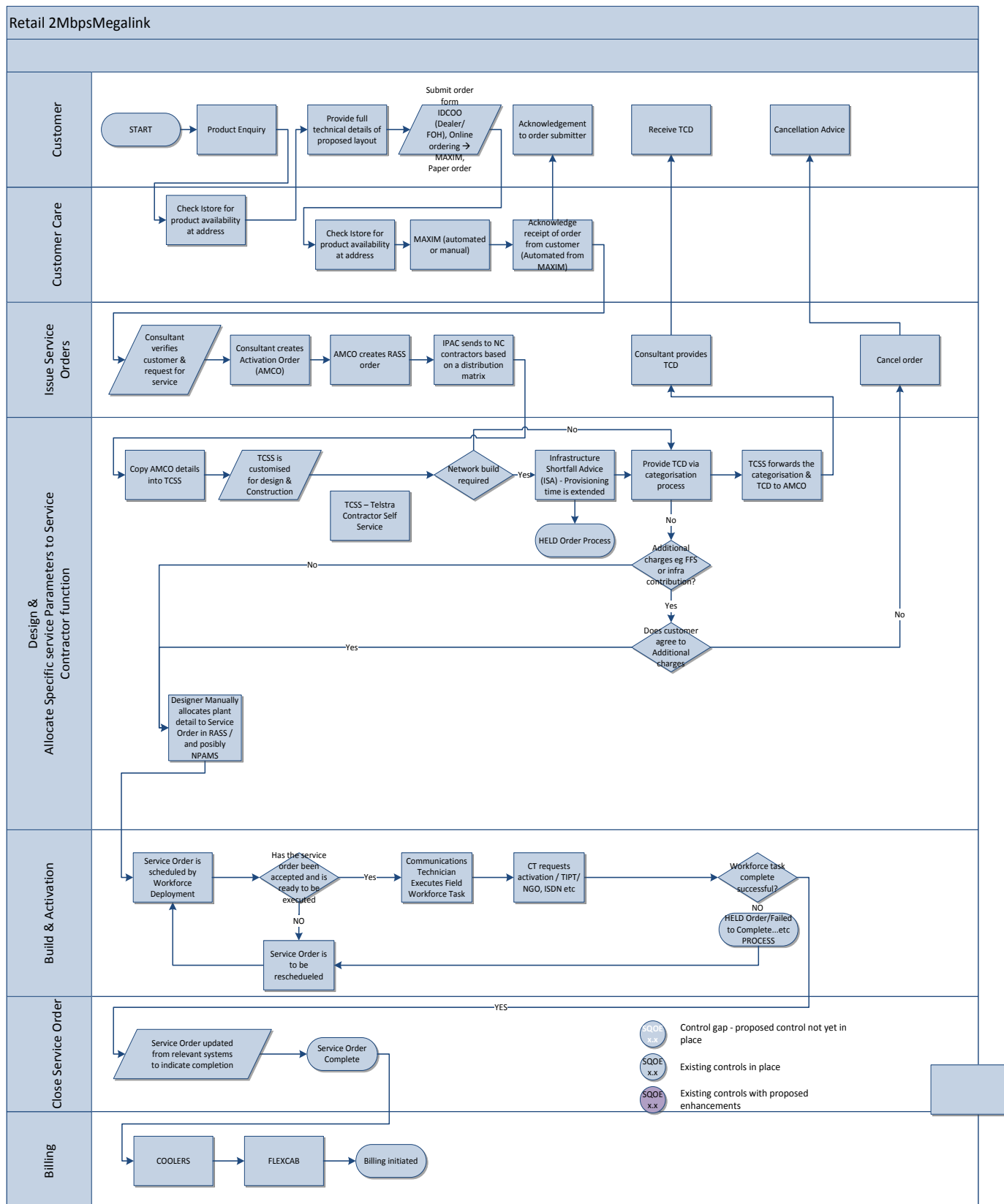
Appendix 3: LSS - Service Activation and Provisioning process diagram (see level 3)



Appendix 4: BigPond ADSL Layer 2 (self install) - Service Activation and Provisioning process diagram (see level 3)



Appendix 5: DTCS and Megalink - Service Activation and Provisioning process diagram (see levels 4 and 5)



Appendix 6: Comparison of NSBU tasks in the activation and provisioning of VULL and BTS (with jumpering required) services

Task no.	VULL (initiated by Wholesale Order)	BTS T20 - green, T30 - orange, T40 - blue (Initiated by Retail or Wholesale BTS order)	Comments regarding other ULL subcategories
1.	<ul style="list-style-type: none"> Locate the main cable pair at exchange mainframe 	<ul style="list-style-type: none"> Locate the main cable pair at exchange mainframe 	<p>e-VULL, IULL, DULL and TULL same as VULL</p> <p>e-VULL and TULL will require existing jumper to be removed</p>
2.	<ul style="list-style-type: none"> Locate Point of Interconnect (POI) block indicated on the ticket of work (TOW) 	<ul style="list-style-type: none"> Locate Telstra's equipment on the relevant block (select correct LI or EN) Verify the correct FNN is working by ringing the Line ID Robot from the block <i>(If an existing jumper is encountered that has the wrong FNN (dial tone), soft dial tone or side tone there is a process to address this)</i> 	<p>e-VULL, IULL, DULL and TULL same as VULL</p>
3.	<ul style="list-style-type: none"> Run a new G/W jumper from the main cable pair at the exchange mainframe to the access seeker's POI port Terminate the G/W jumper in the POI port and the main cable pair 	<ul style="list-style-type: none"> Run a new R/W jumper from the main cable pair exchange mainframe to network equipment to provide dial tone 	<p>e-VULL, IULL, DULL and TULL same as VULL</p> <p>G/W means Green/White R/W means Red/White</p>
4.	N/A	<ul style="list-style-type: none"> Check for dial tone at the main cable pair Ring the Line ID Robot and confirm the correct number is present from the exchange frame <i>(If dial tone fails to appear at the main cable pair, there is a troubleshooting process)</i> 	<p>Process applies to IULL & DULL</p>
5.	<ul style="list-style-type: none"> Clear the exchange jumpering task in 	<ul style="list-style-type: none"> Clear the exchange jumpering task in CT's 	SMS notification to Wireline

	CT's toolkit / toughbook (if a separate TOW)	toolkit / toughbook (if a separate TOW)	Activation for IULL, DULL & TULL. For e-VULL, IULL, DULL and TULL, CT clears the TOW in toolkit / toughbook.
6.	<ul style="list-style-type: none"> Build line to Cross Connect Point (CCP or pillar) as indicated on the TOW Identify main pair and distribution pair Run a new G/W jumper from main cable pair to distribution cable pair 	<ul style="list-style-type: none"> Build line to Cross Connect Point (CCP or pillar) as indicated on the TOW Identify main pair and distribution pair Run a new R/W jumper from main cable pair to distribution cable pair 	VULL only
7.	<ul style="list-style-type: none"> Connect distribution pair to lead-in at pit 	<ul style="list-style-type: none"> Connect distribution pair to lead-in at pit 	VULL only
8.	<ul style="list-style-type: none"> Terminate lead-in at MDF or first socket Where service terminates at first socket, CT to Tag/Label at first socket Where service terminates on MDF, CT will Tag/Label pair at MDF 	<ul style="list-style-type: none"> Terminate lead-in at MDF or first socket Where service terminates on MDF, CT will Tag/Label pair at MDF 	VULL only
9.	<ul style="list-style-type: none"> CT contacts Access Seeker so they can conduct their testing if required Once line build and testing complete CT will send SMS (0407 893 649) to Wireline Activation (WA) 	<ul style="list-style-type: none"> CT conducts FAST test 	VULL only
10.	<ul style="list-style-type: none"> CT clears the TOW in toolkit / toughbook 	<ul style="list-style-type: none"> CT clears the TOW in toolkit / toughbook 	VULL only

Appendix 7: Comparison of NSBU tasks in the activation and provisioning of VULL and ULL Winback services

Task no.	VULL (initiated by Wholesale Order)	ULL Winback to Telstra with jumpering required (initiated by a customer request to churn their service to Telstra).	Comments
1.	<ul style="list-style-type: none"> Locate the main cable pair at exchange mainframe 	<ul style="list-style-type: none"> Locate the main cable pair at exchange mainframe 	
2.	<ul style="list-style-type: none"> Locate POI block indicated on the TOW 	<ul style="list-style-type: none"> (ADSL) Locate the DSLAM block indicated on the TOW, and confirm jumpering is required. 	
3.	<ul style="list-style-type: none"> Run a new G/W jumper from the main cable pair at the exchange mainframe to the access seeker's POI port Terminate the G/W jumper in the POI port and the main cable pair 	<ul style="list-style-type: none"> PSTN – Run a new R/W jumper from main cable pair to LI as per new cable plant details and terminate at LI PSTN/ADSL - Run a new G/W jumper from main cable pair to C pair. Terminate on the C pair only 	G/W means Green/White R/W means Red/White
4.	N/A	<ul style="list-style-type: none"> Where Tech To Advise (TTA) is on TOW, contact Product Connect to cutover Winback customer. 	
5.	N/A	<ul style="list-style-type: none"> Confirm line is not in use, then disconnect old ULL jumper from main cable pair (do not remove from frame at this stage) 	
6.	N/A	<ul style="list-style-type: none"> Terminate new jumper on main cable pair 	
7.	N/A	<ul style="list-style-type: none"> Check for dial tone 	This step is not done for ULLS as the equipment is not ours to sync with

		<ul style="list-style-type: none"> • Check for Sync for ADSL on new jumper • Ring the Line ID Robot and confirm the correct number is present <i>(If Dial Tone fails to appear at the Main Cable pair, there is a troubleshooting process)</i> 	
8.	N/A	<ul style="list-style-type: none"> • When dial tone (and Sync for ADSL) confirmed on new jumper, locate POI Pair, disconnect and remove previous ULL Jumper 	
9.	<ul style="list-style-type: none"> • Clear the exchange jumpering task in CT's toolkit / toughbook (if a separate TOW) 	<ul style="list-style-type: none"> • CT clears the TOW in toolkit / toughbook 	
10.	<ul style="list-style-type: none"> • Build line to Cross Connect Point (CCP or pillar) as indicated on the TOW • Identify main pair and distribution pair • Run a new G/W jumper from main cable pair to distribution cable pair 	N/A	
11.	<ul style="list-style-type: none"> • Connect distribution pair to lead in at pit 	N/A	
12.	<ul style="list-style-type: none"> • Terminate lead-in at MDF or first socket • CT to Tag/Label at SKT • Where service terminates on MDF CT will Tag/Label pair at MDF) 	N/A	
13.	<ul style="list-style-type: none"> • CT contacts Access Seeker so they can conduct their testing if required • Once line build and testing complete CT will send SMS (0407 893 649) to Wireline Activation (WA) 	N/A	
14.	<ul style="list-style-type: none"> • CT clears the TOW in toolkit / toughbook 	N/A	

Appendix 8: Comparison of NSBU tasks in the activation and provisioning of LSS and BigPond ADSL Layer 2 (self install) services

Task no.	LSS (initiated by wholesale order) <i>3 day lead time from order to step 12</i>	BigPond ADSL Layer 2 service (Self Install) (initiated by retail ADSL order) <i>3 day lead time from order to step 12</i>	Comments
1.	<ul style="list-style-type: none"> Locate the main cable pair at exchange mainframe. Verify the correct FNN is working by ringing the Line ID Robot. 	<ul style="list-style-type: none"> Locate the main cable pair at the MDF (at the exchange). Verify the correct FNN is working by ringing the Line ID Robot. 	
2.	<ul style="list-style-type: none"> Locate the Spectrum Sharing Service POI block indicated on the TOW and confirm jumpering is required. From the side label, identify the strip containing the relevant pair 	<ul style="list-style-type: none"> Locate the DSLAM block indicated on the Task, and confirm jumpering is required From the side label, identify the strip containing the relevant pair. 	
3.	<ul style="list-style-type: none"> Run a new G/W jumper from Main Cable pair to LSS POI pair. Terminate on the POI pair only. 	<ul style="list-style-type: none"> Run a new G/W jumper from Main Cable pair to C pair on DSLAM block. Terminate on the C pair only. 	G/W means Green/White.
4.	<ul style="list-style-type: none"> Run a new G/W jumper from LSS POI to PSTN port. Terminate on the POI. 	<ul style="list-style-type: none"> Run a new G/W jumper from X pair on DSLAM block to PSTN port. Terminate on the X pair only. 	
5.	<ul style="list-style-type: none"> Confirm the line is not in use, and then 	<ul style="list-style-type: none"> Confirm the line is not in use, and then 	

	disconnect the old jumper from the PSTN Port.	disconnect the old jumper from the PSTN Port.	
6.	<ul style="list-style-type: none"> • Terminate the new G/W jumper (2) to the PSTN Port 	<ul style="list-style-type: none"> • Terminate the new G/W jumper (2) to the PSTN Port 	
7.	<ul style="list-style-type: none"> • Disconnect the old jumper from the Main Cable pair (Do not remove from the frame at this stage). 	<ul style="list-style-type: none"> • Disconnect the old jumper from the Main Cable pair (Do not remove from the frame at this stage). 	
8.	<ul style="list-style-type: none"> • Terminate the new G/W jumper (1) to the Main Cable pair. 	<ul style="list-style-type: none"> • Terminate the new G/W jumper (1) to the Main Cable pair. 	
9.	<ul style="list-style-type: none"> • Check for Dial Tone at the Main Cable pair: • Ring the Line ID Robot and confirm the correct number is present. 	<ul style="list-style-type: none"> • Check for Dial Tone at the Main Cable pair (<i>If Dial Tone fails to appear at the Main Cable pair, there is a troubleshooting process</i>) • Ring the Line ID Robot and confirm the correct number is present. 	
10.	N/A	<ul style="list-style-type: none"> • Check for Port Sync at the Main Cable pair 	This step is not done for LSS/SSS as the equipment is not ours to sync with
11.	<ul style="list-style-type: none"> • Remove the old jumper from the MDF or first socket 	<ul style="list-style-type: none"> • Remove the old jumper from the MDF or first socket 	

12.	<ul style="list-style-type: none">CT clears the Jumpering Task in CT's toolkit / toughbook	<ul style="list-style-type: none">CT clears the Jumpering Task in CT's toolkit / toughbook	Completion of ADSL order subject to completion of both activation tasks (Wireless Activation team) & CT tasks. If outage of ADSL activation system, this will delay completion of a TOW.
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