

AAPT comment on resubmitted draft Required Measure 1(b) – March 2014

Our comments relate to the section dealing with the "Steps in the Notification Process", section 5.3, step 6.

AAPT welcomes the amendment to step 6 which now commits Telstra to notify Wholesale Customers of a Notification Event within 2 Business Hours of Telstra being advised by NBN Co in at least 90% of cases, and within 4 Business Hours in all remaining cases.

However, AAPT still has the following concerns:

- Step 6 now provides that in notifying a Notification Event, Telstra will provide Wholesale Customer with a Service Address and direct them to LOLS for details of the Notification Event. AAPT notes that Service Addresses are not a searchable field in LOLs. It would be more appropriate to provide Wholesale Customers with one or more of the following fields, which are searchable LOLs:
 - Case Enquiry
 - Customer Reference
 - Telstra Reference
 - FNN
- Insufficient detail re process for notification
 - AAPT notes that the Process Flow Diagram, which purportedly illustrates the communications process for Pull Through Exception Events from end to end, is unfortunately, mostly illegible. Nevertheless, AAPT is concerned by the visible footnote to diagram, which states that "the process for notification may vary in order to meet the timeframe".
 - Whilst AAPT appreciates that this is a new process for Telstra, AAPT remains concerned about the lack of detail about the exception event notification process, in particular how Telstra will communicate such events to a Wholesale Customer.
 - In AAPT's view, Telstra should at the very least provide a clear time line as to when it expects to have a more solid process agreed and in place to manage the exceptions. Whilst AAPT also appreciate that the process may evolve and change based on both Telstra Wholesale and its customers' learnings and experience, AAPT expects that Telstra will, at a minimum, advise Wholesale Customers of the following:
 - who the information will be sent to within Telstra Wholesale
 - who within the Wholesale customer's business will be notified and
 - the method of communication, for example whether by email, phone etc.
 - As it stands, it appears that Telstra will not know what the process will be until they receive their first exception case. In AAPT's view, current circumstances do not and should not preclude Telstra committing to set timeframes and being proactive in seeking to agree acceptable processes with Wholesale customers.