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Continuity of Special Services Past November 2018 is a Necessity

There is a lot of self serving posturing when it comes to the hotly contested topic of NBN, I normally just laugh at what I read, but I really need to call out the narrow minded and in some aspects totally inaccurate views from one small (Aussie Broadband), and one tiny (Launtel) ISP.... Views that if adopted will have a truly negative impact on many businesses around Australia who rely upon copper to provide business data and voice to their business.

<https://www.itwire.com/telecoms-and-nbn/84574-big-telcos-benefit-from-delay-in-special-business-services-moving-to-nbn.html>

<https://www.itwire.com/telecoms-and-nbn/84558-extension-for-moving-special-business-services-to-nbn-opposed.html>

Messrs Britt, and Ivereigh seem to note realize it isn't just Telstra, Optus, Vocus, and TPG that have legacy copper services to cut over, but a number of smaller Tier 2 ISPs like Exetel, Macquarie Telecom, Inabox, etc, and many legacy resellers of Optus XYZed, and AAPT Midband Ethernet services that have a large number of services to migrate as well.

For a data service, it is not just a matter of ordering a TC2 NBN service and moving them over, I truly wish it was that simple, however from Exetel's perspective, these customers are on services which (on average) sync at 14Mbps/14Mbps, and in many places there are no TC2 equivalents, as in many cases the site is only serviceable up to 10Mbps/10Mbps, and don't get me started on NBNs qualification checks.... An order actually has to be placed to see what speed is possible which really is not helpful for a client already worried about what their options are.

In terms of revenue erosion, the comments are not factual, well perhaps they are from their limited experience, but from the viewpoint of my industry colleagues, and also based on Exetel having over 3,000 copper services with an ARPU of about \$525.00 per month, while when we move them to fibre the ARPU is closer to \$700.00 per month. This is not based on profiteering from our end, when we send migration offers to our customers using Telstra Wholesale and AAPT Wholesale fibre, in many cases the offer is cheaper for the same speed they are on now, however many of our clients are taking up higher bandwidths which they did not have access to before.

So from my viewpoint, as there is no real alternative service from NBN to migrate these customers to, and the fact that on average these customers spend more, I really call BS on

these misguided views. I would really wonder how many customers on these legacy Special Services would feel about the flippant remark made by Mr Britt of Aussie Broadband: "Yes, there are lots of migrations to be done, yes it's going to be difficult – but let's just get on and get it done," I'm glad he at least acknowledge that it is difficult, but if something is difficult, then if a short extension of time can be used as a resource to make it less difficult, then I cannot possible fathom why he and others are against a move that actually benefits customers more than it does service providers.

I am at the ACCCs disposal to discuss my experiences in moving customers to equivalent TC2 and other fibre services at your convenience.

Yours sincerely,

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