



**Re: Enquiry into Broadband performance monitoring and reporting program**

**Home Loan Experts** welcomes the enquiry into the broadband performance monitoring and reporting program by the Australian Competition & Consumer Commission.

We are specialist mortgage brokers who provide our services through the internet. We are also very reliant on broadband services for most of our marketing efforts. Therefore the quality and reliability of our internet services play a large role in determining our own performance and ability to provide services.

Since this program aims to provide consumers with more information, regulate ISPs and improve overall broadband services, we as consumers feel that it is necessary to contribute to this consultation paper.

Our answers to the some questions put forward are as follows:

- **Do you agree that a probe-based testing methodology would be the most reliable and accurate approach for the Australian context?**

Yes, considering the information supplied in the discussion paper, this approach does seem the most reliable, accurate as well as cost-effective of the three.

- **What services should be included in the ACCC's proposed performance monitoring and reporting program?**

We think that ADSL and HFC-based broadband services should be monitored since they encompass up to 96% of total services. If the cost is too high then only ADSL can be monitored since this is already 80% of all services.

Regarding the use of broadband by small businesses, being a small business (less than 30 employees), we do not agree that all small businesses use the same kinds of services as residential customers. However, we do agree that a one man or two man shop may do so. In this sense, a better definition of "small" businesses may help minimize the target demographic.

We also think that the categorizing of businesses according to the volume of data used may also give more accurate results.

- **Which of the variables (ISP, geographic region, speed tier or size of each 'sample set') is most important and why?**

We think that geographic region is the most important variable because it is the most generic. Other variables such as ISP or speed tier may not provide accurate results since the number of users per variable may vary too much.

We thank the ministry for allowing us this opportunity to offer information and share our opinions on such a serious matter. We look forward to hearing the outcome of this enquiry.

Regards,  
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Director, Home Loan Experts

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