

The logo for Optus, consisting of the word "OPTUS" in a bold, teal, sans-serif font.

Submission in response to
ACCC Discussion Paper

**Variation to Telstra's
Migration Plan**

Public Version

16 October 2018

INTRODUCTION

1. This submission provides Optus' feedback on the proposed variation to Telstra's Migration Plan dated 7 September 2018.
2. The proposed variation details four sets of amendments, each addressing a separate matter. In this submission, Optus primarily focuses on the proposed changes to the ITO process and the proposed deferral of the commencement of disconnections for TSS.
3. In summary, Optus supports all proposed changes to the Migration Plan outlined in the submission in relation to the ITO process and deferral of the commencement of disconnections.
4. Optus proposes an amendment to the new clause 7.3 in Schedule 7 RM 5(A), 5(C), 5(D), 5(E) Final Notification for Wholesale Customers before the Disconnection Date.

DETAILED COMMENTS

Proposed variations relating to NBN Co's HFC pause.

5. Optus has no comments to make on these proposed changes.

Extension of the existing ITO disconnection arrangements.

6. The proposed amendment extends the application of the existing Phase 1 / Phase 2 ITO arrangements for Premises subject to RRDD from 30 June 2018 to 30 June 2022.
7. Optus is in favour of this extension as it provides industry with long-term certainty around the operation of the Migration Plan.

Temporary disconnection extension for Premises with registered fire alarm and lift phones

8. Optus has no comments to make on these proposed changes.

Changes to the plan relating to TSS

9. Optus supports the proposed changes to migration arrangements for Special Services and Special Services Inputs (i.e. business services) that
 - a) Delay the commencement of any disconnection activity for services with a deactivation date of 12 November 2018 until 29 January 2019 (i.e. after the Christmas, New Year and Australia Day public holidays). This will minimise the potentially disruptive impacts of disconnections activity over the holiday period, and
 - b) Provide an ITO process to users that have placed an NBN Co order for the SSDD.
10. Optus' support is based on its belief that these proposed changes will promote service continuity to Optus' business customers and help foster a positive customer experience.

11. Optus supports the proposed Extension of disconnection for “late landing” TSS for the reasons outlined in 10 above.
12. Optus has concerns with the proposed Clause 7.3 (a)(i). Optus does not believe this is consistent with one of four Migration Plan Principles, namely minimising disruption to the supply of services to the extent that it is in Telstra’s control. Optus submits that business customers have complex products and require significant time to migrate their services off the copper network, therefore additional time is required to ensure continuity to supply of services. Optus submits that the proposed Special Service In-Train Order process makes no provisions for orders processed after the SSDD and that it should be amended to incorporate NBN Co orders that are processed up to DD+25 BDs as per non-Special Service In-Train Order rules. This will ensure current business processes are retained and the migration of business services continue to occur in a smooth and succinct manner promoting service continuity.

Minor additional amendments to promote the orderly disconnection of TSS.

13. Optus supports these minor amendments