
Schedule 1 Required Measures

Required Measure 1(a) – Pull Through Consents

1 Background

Pull Through may occur where NBN Co (or its contractors) are unable to ‘push’ its ~~optical~~ fibre ~~optie-cable~~Line, Copper Line or HFC Line through the relevant Lead in Conduit (LIC) as required to connect a Premises. In such circumstances, Telstra has agreed that NBN Co may use an existing ~~copper-cable~~Copper Lines or HFC ~~cable~~Lines, where practicable, to ‘pull through’ its Copper Line, HFC Line or optical fibre ~~cable~~Line (**Pull Through**).

To conduct Pull Through, NBN Co requires various consents, releases and undertakings (**Required Consents**) from Telstra or Telstra Wholesale Customers who acquire or provide services over the relevant ~~cable~~Line.

Telstra has provided its own general consents and releases directly to NBN Co under the Definitive Agreements to allow Pull Through on ~~cables~~Lines over which it provides services. Telstra Wholesale must use reasonable endeavours to obtain the Required Consents from its Wholesale Customers.

Where NBN Co is considering conducting Pull Through using a ~~copper-cable~~ Copper Line in a LIC which is used to provide services to a Wholesale Customer, Telstra must advise NBN Co, amongst other things, that the relevant LIC cannot be used for Pull Through unless all Telstra Wholesale Customers using ~~cables~~Copper Lines in that LIC have provided the Required Consents.

This Required Measure 1(a) sets out the process Telstra will use to obtain a Wholesale Customer’s Required Consent and record that information in Telstra’s systems so that it can respond to NBN Co in a timely manner about whether a cable is suitable for Pull Through.

2 Application

For clarity, this Required Measure 1(a) applies only to the Copper Network.

3 Process for obtaining the Required Consents from Wholesale Customers

3.1 Overview

Telstra will seek the Required Consent from each Telstra Wholesale Customer on an upfront, global basis, i.e. in relation to all wholesale services supplied to that customer from time to time on Telstra’s Copper Network. The Required Consent will mirror the consent that Telstra in its capacity as a service provider has given to NBN Co.

3.2 Briefing Materials

Telstra will:

- (a) make available to Wholesale Customers briefing materials in respect of Pull Through on the Telstra Wholesale Customer Portal (TWCP) and the Telstra Wholesale website; and
- (b) provide written notification to each Telstra Wholesale Customer advising that this information is available and can be discussed with their Telstra Wholesale Account Manager or ~~Business Operations Service~~ Manager; and
- (c) provide one-on-one briefings on Pull Through to Telstra Wholesale Customers with a significant number of potentially impacted services.

3.3 Contractual Documentation

- (a) Following approval of this Required Measure, Telstra will:
 - (i) provide to Telstra Wholesale Customers a Deed Poll containing the Required Consents in favour of Telstra and NBN Co and a Disclosure Consent; and
 - (ii) via its Account Managers and ~~Business Operations Service~~ Managers, be available to discuss and answer any questions a Wholesale Customer may have regarding the Deed Poll.
- (b) the Deed Poll will:
 - (i) enable a Wholesale Customer to provide the Required Consents for other members of its corporate group as well as identify other former company names for its group in whose names services may still be registered in Telstra's systems;
 - (ii) allow a Wholesale Customer to terminate the Deed Poll at any time with termination to take effect from the date effected within Telstra systems (which will be within 10 Business Days after receipt of the notice); and
 - (iii) be the mechanism for obtaining operational contacts and contact details to be used in the event that there is a Pull Through Exception Event (i.e. if there is an issue when Pull Through is conducted). Wholesale Customers will need to provide and keep updated the relevant contact details for Telstra to use when notifying customers of a Pull Through Exception Event.
- (c) Termination of a Deed Poll under paragraph (b)(ii) above will not affect Pull Through activities that have already commenced.
- (d) The Disclosure Consent will permit Telstra to disclose to:
 - (i) NBN Co the Wholesale Customer's name as the provider of services carried on a particular ~~cable~~Copper Line; and
 - (ii) the ACCC that the Wholesale Customer has consented to the Deed Poll, or has not consented to the Deed Poll, as the case may be, as part of Telstra's reporting obligations under the Migration Plan.
- (e) Telstra will separately record in its systems whether the Disclosure Consent has been obtained.
- (f) Telstra will provide the ACCC with copies of any of the signed Deed Polls and Disclosure Consents upon request.

3.4 Recording of Wholesale Customer interaction

- (a) Telstra will record in its Customer Relationship Management system (Nexus) all key Wholesale Customer interactions including the following:
 - (i) Telstra ~~GMD~~Group Executive notifications to Wholesale Customers of Pull Through materials;
 - (ii) the name of each Wholesale Customer invited to a briefing on Pull Through and whether that Wholesale Customer attended the briefing;
 - (iii) the date upon which a Deed Poll was sent to a Wholesale Customer for signing;
 - (iv) the date upon which a Disclosure Consent was sent to a Wholesale Customer for signing;
 - (v) the name of each Wholesale Customer who refused to return a signed Deed Poll;
 - (vi) the name of each Wholesale Customer who refused to return a signed Disclosure Consent;
 - (vii) the date upon which a signed Deed Poll was received from a Wholesale Customer; and
 - (viii) the date upon which a signed Disclosure Consent was received from a Wholesale Customer.
- (b) Nexus will contain a perpetual link to the stored electronic copy of the Deed Poll and Disclosure Consent in Telstra's Enterprise Document Management System (**EDMS**).
- (c) Once pull through activity commences, Telstra anticipates the following will occur:
 - (i) the details of the consent(s) provided will be included in the Wholesale Data Repository (**WDR**) update provided from Nexus each day and uploaded into the NBN Transition Tool (**NTT**), a database tool which includes functions such as address-matching, NBN rollout scheduling and customer migration tracking; and
 - (ii) there will be a daily data feed from WDR to NTT which will ensure that consent details are consistently updated. Access to NTT will be regulated by the provisions of the NBN Information Security Plan to the extent the information relates to FTTP-Connected Premises.
- (d) The default position in WDR and NTT will be set to No – no Pull Through Activities and no disclosure of the Wholesale Customer's name, until the relevant signed documentation has been provided by the Wholesale Customer and the details are updated in Telstra's systems.

3.5 Withdrawal of Required Consents

A Required Consent may be withdrawn by a Wholesale Customer at any time by terminating the Deed Poll following the formal notice procedures provided in the Deed Poll and advising the Telstra Wholesale Account team in writing.

4 Equivalence

- (a) Telstra retains some contractual rights in respect of NBN Co's activities during Pull Through (in particular, in respect of Pull Through Exception ~~events~~Events). To the extent that Telstra has a contractual right to seek performance by NBN Co of its obligations to perform ~~cable-rectification~~Cable Rectification activities in respect of a ~~cable~~Line used for ~~pull-through~~Pull Through or a ~~temporary-cable~~Temporary Cable, Telstra will enforce those rights equivalently (regardless of whether the end user impacted is a customer of Telstra Retail or a customer of a Telstra Wholesale customer).
- (b) Telstra has provided to NBN Co similar releases and indemnities in NBN Co's favour in respect of NBN Co conducting Pull Through activities.

5 Reporting

Telstra will include in its confidential Migration Plan Compliance Report provided to the ACCC on a quarterly basis under clause ~~26.226~~ of the Plan, information as to:

- (a) the number of Wholesale Customers that have consented to Pull Through;
- (b) the number of Wholesale Customers that have not consented to Pull Through; and
- (c) the number of Wholesale Customers that withdrew their consent to Pull Through during the relevant Quarter.

Amended Required Measure 1(b) – Pull Through Exception Event and Installation of Temporary Cable Notifications

1 Background

This Required Measure 1(b) complements Required Measure 1(a) by setting out the process by which Telstra will communicate to an affected Wholesale Customer that Telstra has received notification from NBN Co of a Notification Event.

A Notification Event for the purposes of this Required Measure is where:

- (i) NBN Co is prevented by a Pull Through Exception Event from completing Pull Through Activities, Cable Rectification or the installation of a Temporary Cable at a Premises and which relates to a Copper Line used to supply a Wholesale Service; or
- (ii) NBN Co has installed a Temporary Cable which is being used to supply a Wholesale Service.

Business Hours means the hours between 9.00am and 5.00pm on a Business Day.

2 Application

For clarity, this Required Measure 1(b) applies only to the Copper Network.

3 Types of Pull Through Exception Events

A Pull Through Exception Event can occur at any time during Pull Through Activities, installation of a Temporary Cable or Cable Rectification for a LIC. The three most common types of Pull Through Exception Events are:

- (a) Where NBN Co is prevented from completing Pull Through Activities due to not being able to pass through the LIC to the Premises and therefore not completing Cable Rectification. For example, this could occur where NBN Co starts Pull Through Activities for which it has consent, but during the Pull Through Activities an end user withdraws its consent for NBN Co to be at the Premises.
- (b) Where the Copper Line was fully or partly removed as part of Pull Through Activities but NBN Co is not able to return the previous (or replacement) Copper Line back into the LIC and Telstra copper services cannot be reconnected. For example when very bad weather requires NBN Co to leave the site and prevents NBN Co re-inserting the Copper Line to allow the supply of services by Telstra.
- (c) Where NBN Co is prevented from installing a Temporary Cable to provide services on the NBN (and has not otherwise been able to complete Cable Rectification).

~~(e)~~ Note: For the purposes of this Required Measure 1(b), installation of Temporary Cable is only associated with Pull Through Activity. NBN Co will only install a Temporary Cable when Cable Rectification is unsuccessful. An example is when a blockage in the LIC prevents the existing copper cable from being reinstated in the LIC and a Temporary Cable needs to be used instead of the copper cable, however to install that Temporary Cable would expose NBN Co to an unmanageable workplace health and safety risk.

4 The Notification Process for Notification Events

- (a) The notice required to be given by Telstra to an affected Wholesale Customer in accordance with clause ~~40.310.3~~ of the Plan will be given via the Telstra Wholesale LOLS.
- (b) The notice to Wholesale Customers on LOLS will include:
- (i) the Telstra fault reference number;
 - (ii) the service address and/or NBN location ID;
 - (iii) Pull Through Exception Event start date and time;
 - (iv) Reason for Pull ~~through~~Through Exception Event; and
- any other information provided by NBN Co to Telstra in respect of the Notification Event, except information which is the confidential information of NBN Co (e.g. contact details of the NBN Co technician).
- (c) An affected Wholesale Customer may search the LOLS fault records to track progress of the record using search functions based on either:
- (i) the Telstra fault reference number provided in the notification; or
 - (ii) the FNN.
- (d) In the event that NBN Co does not give notice to Telstra of the Notification Event, Telstra is not required to give notice to the affected Wholesale Customer.
- (e) Telstra will operate, between 7am to 8pm Sydney time Monday to Friday, excluding national public holidays (unless otherwise agreed with NBN Co) a help desk:
- (i) located outside Telstra Retail; and
 - (ii) staffed by trained Telstra employees who are experts in communication activities.
- (f) The steps set out in Table 1 below show how Telstra will notify an affected Wholesale Customer of a Notification Event that has been received by Telstra from NBN Co.

Table 1

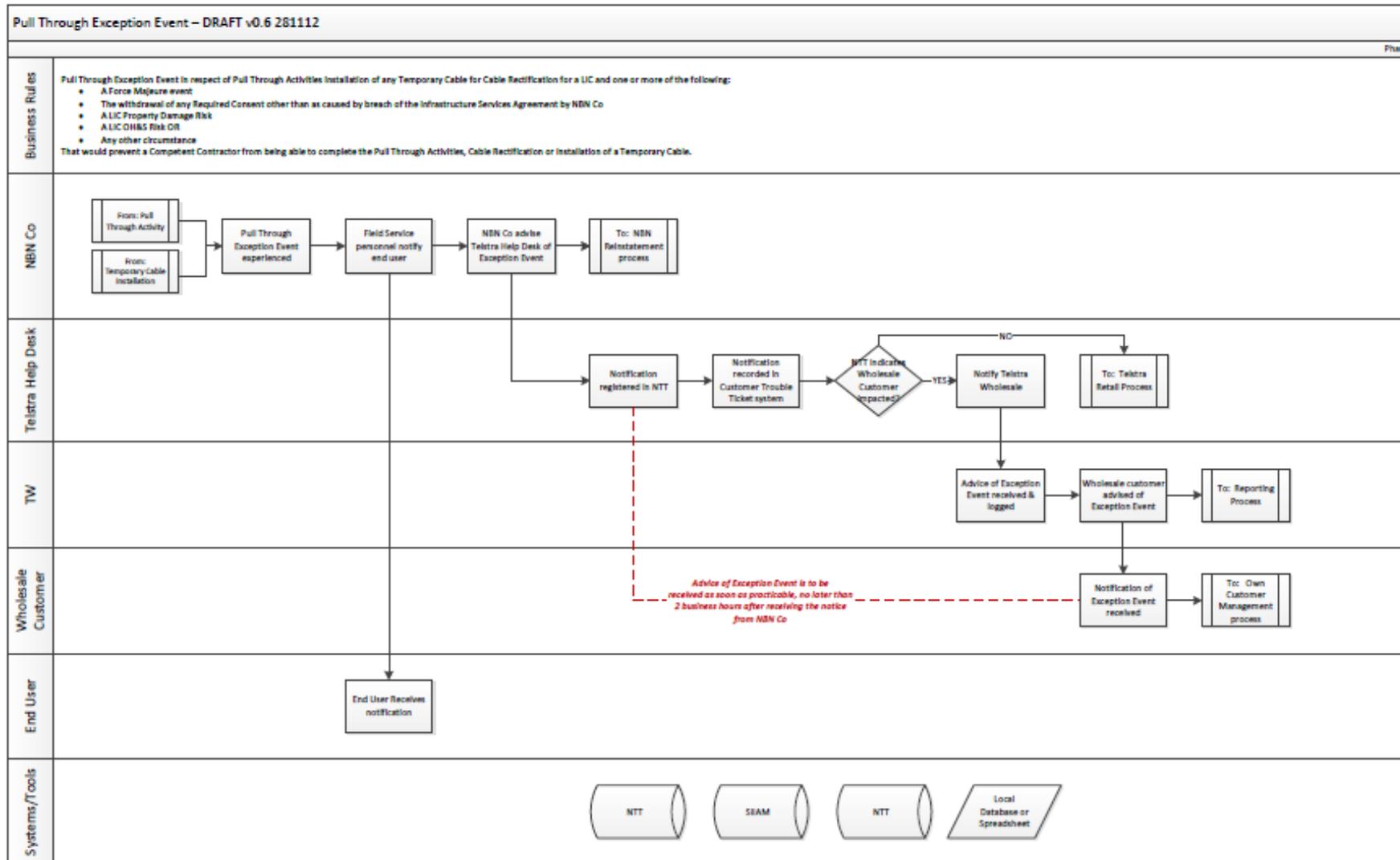
Steps	Description	Initiating Party	Receiving Party
1 NBN Co reports Notification Event to Telstra	NBN Co will notify Telstra (current arrangements are that this will occur by telephone to Telstra's help desk) that a Notification Event has occurred at a Premises. This notification could occur inside or outside Business Hours, but it must occur within the hours of operation of the help desk (as set out below).	NBN Co	Telstra help desk
2 Telstra	At the same time that the telephone notification is being	Telstra help	Telstra

Steps	Description	Initiating Party	Receiving Party
records Notification Event in its IT system	received, Telstra help desk staff will update Telstra's IT data system developed for storing migration address and service information (NTT), to include a record of the fact that a Notification Event has occurred at the Premises. This IT record in NTT will include the information about the Notification Event that occurred, as advised by NBN Co.	desk	(NTT System)
3 Identification of affected Wholesale Customer	<p>Telstra's help desk staff will load the information into the NTT system. The NTT system will match the details of the Premises as notified by NBN Co with the details in Telstra's own systems. The NTT system will present information to the Telstra help desk identifying any Wholesale Customers affected by the Notification Event.</p> <p>If NTT presents more than one Wholesale Customer providing services at the Premises and NBN Co does not notify Telstra which Wholesale Customers are affected by the Notification event, then Telstra will notify all Wholesale Customers potentially impacted by the Notification Event.</p>	Telstra help desk	Telstra NTT system
4 Flag in assurance systems	<p>Telstra's assurance system for recording service faults (currently SIIAM for copper services) will be updated by the staff at the Telstra help desk as part of registering the notification information. The timeframe for this step being completed is expected to be within minutes of the receipt of the notification information.</p> <p>The update will flag the services at the Premises so that if a fault is reported at the Premises, the Notification Event can be communicated to the customer who may be inquiring about the fault, whether that customer is a Wholesale Customer or a retail customer.</p> <p>The update in SIIAM will automatically trigger a corresponding update of LinxOnline Service (LOLS). Wholesale Customers can access key information about the Notification Event through LOLS.</p>	Telstra help desk	Assurance system
5 Notify Telstra Wholesale	Telstra help desk staff will then advise the designated Telstra point of contact for Telstra Wholesale of the Notification Event. This notification will occur via email to an established Telstra Wholesale email address. After the email is sent the NTT update is completed.	Telstra help desk	Telstra Wholesale contact Point
6 Telstra notify Wholesale Customer	<p>The Telstra Wholesale point of contact will organise for the Wholesale Customer to be advised that the Pull Through Exception Event occurred.</p> <p>Telstra will notify the Wholesale Customer as soon as reasonably practicable, but in any event within 2 Business Hours of Telstra being advised by NBN Co of a Notification Event to the Telstra help desk during its hours of operation as described below, in at least 90% of cases, and within 4 Business Hours in all remaining</p>	Telstra Wholesale point of contact	Telstra Wholesale Customer

Steps	Description	Initiating Party	Receiving Party
	<p>cases.</p> <p>Telstra will advise the Wholesale Customer of the Notification Event and the fault reference number or the FNN, and will direct the Wholesale Customer to LOLS for details of the Notification Event.</p> <p>The details of the Notification Event available to the Wholesale Customer on LOLS will contain all the relevant information from SIAM set out in 24(b) above.</p>		
7 Acknowledge ment	The Telstra Wholesale Customer will then acknowledge receipt of notification from Telstra and proceed to initiate their customer communications.	Telstra Wholesale Customer	Telstra Wholesale
8 Record contact	Telstra will record and store all advices to and from Telstra Wholesale customers about Notification Events in accordance with Telstra's record keeping practices.	Telstra Wholesale	Telstra Wholesale database

- (g) Diagram 1 below is a flow diagram which illustrates the communications process for Pull Through Exception Events from end to end.

Diagram 1



*Note the process for notification may vary in order to meet the timeframe. Telstra will endeavour to use its BAU process to communicate Notification Events and will work with Wholesale Customers over time to determine an appropriate communications process that is designed to meet the 2 Business Hour timeframe.

5 Equivalence

- (a) Telstra's process to notify a Wholesale Customer of a Notification Event will be equivalent as between Wholesale Customers and Telstra's Retail ~~business units~~Business Units in respect of Telstra updates to the fault reporting databases, which automatically create a fault record in LOLS.
- (b) The step to notify a Wholesale Customer of a Notification Event (as set out in step 6 of Table 1 in paragraph 4(f) of this Required Measure 1(b)) is a notification made to Wholesale Customers only, and is in addition to any notification of a Pull Through Exception Event to a Telstra Retail ~~business unit~~Business Unit.

6 Reporting

Telstra will include in its confidential Migration Plan Compliance Report provided to the ACCC on a quarterly basis under clause ~~26.226~~ of the Plan, information as to the:

- (a) total number of Notification Events that were notified by NBN Co to Telstra for the relevant Quarter in all Rollout Regions on or after the Ready for Service Date;
- (b) total number of Notification Events that were notified by NBN Co to Telstra for the relevant Quarter in all Rollout Regions on or after the Ready for Service Date that affected one or more Wholesale Customers;
- (c) total number of Notification Events that were notified by NBN Co to Telstra for the relevant Quarter in all Rollout Regions on or after the Ready for Service Date that affected one or more Wholesale Customers, and which Telstra provided notification to all the relevant Wholesale Customers under this Required Measure; and
- (d) percentage of Notification Events communicated to Wholesale Customers for the relevant Quarter in all Rollout Regions within:
 - (i) 2 Business Hours; and
 - (ii) 4 Business Hours,

from Telstra receiving notification from NBN Co of the Notification Event for the affected Wholesale Customer.

