IT'S HOW WE CONNECT

Telstra Corporation Limited

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

April 2014

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1 Background

On 27 February 2012, the ACCC accepted Telstra's Structural Separation Undertaking (**Undertaking**) under section 577A of the Act and approved Telstra's draft Migration Plan (**Plan**) under section 577BDA of the Act.

The Undertaking came into force on 6 March 2012 and the Plan commenced on 7 March 2012.

The Plan requires Telstra to submit to, and have approved by, the ACCC, Required Measures setting out a number of matters, including the process by which Telstra will give notice to affected Wholesale Customers of notification Telstra receives from NBN Co that:

(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,

each of (i) and (ii) being, a **Notification Event** for the purposes of this Required Measure.

2 Defined terms and interpretation

A term or expression starting with a capital letter:

a) which is not defined in these Required Measures, has the meaning given to it in the Plan; and

b) which is not defined in the Plan, has the meaning given to it in the Undertaking.

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

3 Overview

The process for connecting services to the NBN at Premises allows NBN Co, in certain circumstances, to use the copper and HFC cables that are lead-in cables to the Premises as pull through cables to enable NBN Co fibre cables to be hauled through lead-in conduits (**LICs**). An example of when pull through may be used is where the LIC has sufficient capacity for an additional fibre cable, but that capacity is limited by the presence of the existing cable/s, for example, due to the way the existing cable/s are resting in the LIC, particularly at bends in the LIC. Pull through activities are described in more detail in Clause 10 of the Plan. Although the decision as to whether Pull Through Activity occurs lies with NBN Co in each instance, Telstra expects the number of instances where a Notification Event occurs to be small.

The Required Measure 1 (a) covers the process by which Telstra will use reasonable endeavours to obtain the relevant consents and releases from Wholesale Customers for Pull Through Activities in accordance with Clause 10.1 of the Plan. 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.

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This Required Measure 1 (b) firstly illustrates the communication arrangements that will be established between Telstra and NBN Co for notification of these events, which are then used as the basis for the development of this Required Measure.

4 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 listed below.

4.1 Prevention of completion of Pull Through Activities

A Pull Through Exception Event can arise when NBN Co has attempted to undertake Pull Through Activities at a Premises but, because of the Pull Through Exception Event, the Pull Through Activity is not able to be successfully completed. That is, NBN Co's fibre has not been able to be passed through the LIC to the Premises and Cable Rectification is not completed. This could happen, for example, 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.

4.2 Prevention of Cable Rectification by a Copper Line

A Pull Through Exception Event can also arise when the Copper Line was fully or partly removed as part of Pull Through Activities but NBN Co cannot return the previous (or replacement) Copper Line back into the LIC. In this situation, the Telstra copper services cannot be reconnected.

An example may be 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.

4.3 Prevention of installation of a Temporary Cable

A Pull Through Exception Event can also arise when 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). Within this Required Measure, 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 but NBN Co would be exposed to an unmanageable workplace health and safety risk to install that Temporary Cable.

5 The Notification Process for Notification Events

5.1 Notification from NBN Co to Telstra about Notification Events

This Required Measure applies from the time NBN Co provides the relevant notification to Telstra about occurrence of the Pull Through Exception Event or the installation of a Temporary Cable. If that notification is not provided by NBN Co, then Telstra will be unable to provide any notice to Telstra Wholesale Customers.

Within the context of NBN Co performing Pull Through Activities, NBN Co is obliged to notify Telstra of a Pull Through Exception Event as described above as soon as practicable, and also when NBN Co installs a Temporary Cable. In the latter case, this notification is provided whether or not a Pull Through Exception Event occurs on that Temporary Cable that prevents installation being completed.

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5.2 Telstra Wholesale informs Telstra Wholesale Customers

This section sets out the communication Telstra Wholesale will provide to affected Telstra Wholesale Customers when it receives the relevant notification from NBN Co that either a Pull Through Exception Event has occurred, or that NBN Co has installed a Temporary Cable and that cable is being used to supply a Wholesale Service of that Wholesale Customer.

Telstra Wholesale will promptly give notice to the affected Telstra Wholesale Customer of the Notification Event as notified by NBN Co (other than to the extent that the information is confidential), as set out below.

5.3 Steps in the Notification Process

The steps below indicate how Telstra will notify an affected Wholesale Customer of a Notification Event that has been received by Telstra from NBN Co.

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 records Notification Event in its IT system	At the same time that the telephone notification is being 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.	Telstra help desk	Telstra (NTT System)
3 Identification of affected Wholesale Customer	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. 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.	Telstra help desk	Telstra NTT system
4 Flag in assurance systems	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	Telstra help desk	Assurance system

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Steps	Description	Initiating Party	Receiving Party
	receipt of the notification information. 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. 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.		
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	The Telstra Wholesale point of contact will organise for the Wholesale Customer to be advised that the Pull Through Exception Event occurred. 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 cases. Telstra will advise the Wholesale Customer of the Notification Event and the fault reference number or the full national number (FNN) , and will direct the Wholesale Customer to LOLS for details of the Notification Event. The details of the Notification Event available to the Wholesale Customer on LOLS will contain all the relevant information from SIIAM set out in 5.4 below.	Telstra Wholesale point of contact	Telstra Wholesale Customer
7 Acknowledgement	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

5.4 Details of the Notification to Telstra Wholesale customers

The notification advice available to Telstra Wholesale Customers on LOLS will include:

- the Telstra fault reference number;

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- the service address and/or NBN locations ID;
- Exception Event start date and time;
- Reason for Pull through Exception event; and
- other information provided by NBN Co to Telstra in respect of the Notification Event except information which is confidential information of NBN Co, e.g. contact details of the NBN Co technician.

In addition, the Wholesale Customer can search LOLS fault records to track progress of the record using search functions based on either the Telstra fault reference number provided in the notification or the FNN.

5.5 Telstra help desk

The Telstra help desk is the primary point of contact for the NBN Co to advise Telstra about the Notification Event. The help desk will be staffed by trained Telstra employees who will be experts in communication activities. The help desk is staffed between 7am to 8pm Sydney time Monday to Friday, excluding national public holidays, unless otherwise agreed with NBN Co (in which case Telstra will make such information available to Wholesale Customers). Outside these hours there will be a recorded message advising NBN Co to notify when the help desk is open to receive Notification Events. The Telstra help desk described in this Required Measure is a business group located outside Telstra Retail.

6 Process Flow Diagram

The following flow diagram illustrates the communications process for Pull Through Exception Events from end to end. Telstra's direct involvement begins part way through the end to end process.

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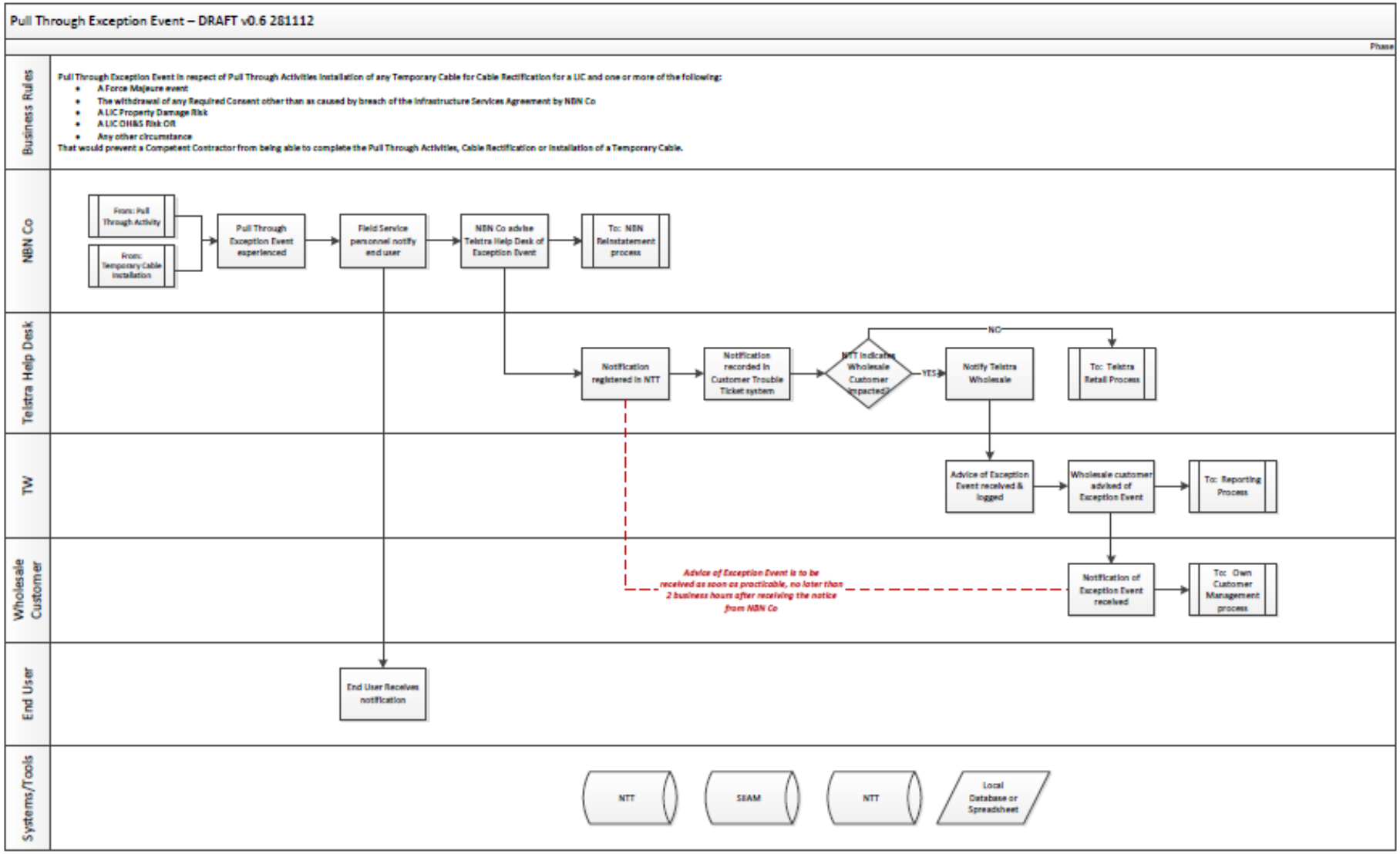

*Note the process for notification may vary in order to meet the timeframe. Telstra will endeavour to use its BAU process to communicate Notification Events and will work with Wholesale Customers over time to determine an appropriate communications process that is designed to meet the 2 Business Hour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

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7 Equivalence

Telstra's process to notify wholesale customers of notification events will be equivalent as between Wholesale Customers and Telstra's Retail business units in respect of Telstra updates to the fault reporting databases, which automatically creates a fault record in LOLS.

The step to notify Wholesale Customers of Notification Events (as set out in step 6 of section 5.3 of this Required Measure) is a notification made to Wholesale Customers only, and is in addition to any notification of a Pull Through Exception Event to Telstra's Retail business units.

8 Reporting

Telstra's performance against this required measure will be monitored and reported on a quarterly basis as part of a Migration Plan Compliance Report, commencing from the first full Quarter after acceptance of this Required Measure by the ACCC.

The report will contain the:

- 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;
- 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;
- 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
- the percentage of Notification Events communicated to Wholesale Customers for the relevant Quarter in all Rollout Regions within (a) 2 Business Hours; and (b) 4 Business Hours, from Telstra receiving notification from NBN Co of the Notification Event for the affected Wholesale Customer..

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