



Robert Wright
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Dear Robert,

Optus provides feedback on the following clauses detailed in Telstra's proposal to vary the Migration Plan for Fibre to the Curb.

Clauses 9.1(a)(vii), 9.3(d) and 22.8 (c)(ii)

Optus has concerns with Clauses 9.1(a)(vii), 9.3(d) and 22.8 (c)(ii) as the disconnection of the legacy copper will be triggered by Telstra being notified of the completion of the FTTC Order by NBN Co. It is Optus' understanding from discussions with NBN Co that a premises will be deemed FTTC-connected ten (10) calendar days after an order is accepted by NBN Co even if there is no detection of data on the line.

Activation of a FTTC service under the self install process requires the receipt of both the Wholesale Customer's modem and NBN Co's NCD and the end user subsequently plugging in both pieces of equipment to their relevant CPE. This process is further complicated when the end user is migrating a special service from legacy copper to nbn FTTC as the end user may need to arrange changes to their CPE.

Optus submits that the disconnection of the legacy services should not automatically occur 10 calendar days after an order is accepted by NBN Co. The proposed process is aimed at a basic residential service rather than customers who have more complex services such as medical alarms or business/special services. The proposed process assumes that the delivery of the NCD is successful and that the CPE changes have occurred within the 10 calendar day period. The proposal to allow Wholesale Customer's to extend the completion by another 10 calendar days makes the process logistically more difficult to manage and places the onus on the end user and the Wholesale Customer's to liaise to ensure that services on the legacy copper service should not be disconnected. In the event that the legacy service is prematurely disconnected, it should be noted that the reinstatement of a legacy service is not an automatic or streamlined process and often takes weeks to reinstate.

Optus does not believe the amendment to the Migration Plan allows Wholesale Customers to retain autonomy and control over the timing of the disconnection by Telstra of that Wholesale Customer's Copper Service at an FTTC Premises. For other NBN Co access technologies which rely on RSP managed self-install processes (e.g. FTTN/B and HFC), the migration to the NBN network is determined by a customer requirement date (CRD) which is agreed between the end user and the Wholesale Customer. Therefore to allow the best possible experience for the end user, the timeframe should be extended to at least 30 calendar days from the acceptance of the order OR when data is detected on the FTTC service. A longer default period of time will enable all service types to migrate in a timeframe to cover most circumstances which include special services. The ability to extend the 30 calendar days should also be provided.



Clause 15.1A

In the interests of providing customers with a positive customer experience during the migration period Optus submits that the current In-Train Order arrangements should extend beyond 30 June 2018 and not revert to clause 15.1 on 1 July 2018. i.e. the provisions for the In-Train Order Premises under 15.1A (Phase 1 and 2) should remain for the period of the Migration Plan. Below is an extract of the relevant clause:

“15.1A Disconnection of In-Train Order Premises in Rollout Regions with Disconnection Dates between 1 January 2016 and 30 June 2018

...

*(b) In respect of a Premises within the Fixed Line Footprint of a Rollout Region whose Disconnection Date falls between **1 January 2016 and 30 June 2018** (both dates inclusive) that is Passed, if:*

*15.1 Disconnection of In-Train Order Premises in Rollout Regions with Disconnection Dates on or after **1 July 2018**”*

Schedule 1 Clause 5.1(b)

Schedule 1 Clause 5.1(b) has a typographical error and does not list FTTC-Connected Premises. Instead it has listed FTTN-Connected Premises twice.