COMMUNICATIONS

ALLIANCE LTD

INDUSTRY GUIDELINE

G652:2016

NBN MIGRATION MANAGEMENT

G652:2016 *NBN Migration Management* Industry Guideline

Communications Alliance Ltd was formed in 1997 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

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INTRODUCTORY STATEMENT

The **NBN Migration Management** Guideline (G652:2016) (this Guideline) is designed to document the roles and responsibilities of each relevant party, that is, Telstra (as copper network owner, a major telecommunications service wholesaler and a Retail Service Provider (RSP)), legacy network owners other than Telstra, RSPs, nbn, Medical Alarm Service Providers (MASPs) and Application Service Providers (ASPs) within fixed network migration process. The Guideline describes the process to support Customer management of the various Customer groups in relation to the migration of Customers on to nbn's network (and other similar networks).

The 2014 version of this Guideline only applied to Fibre to the Premises (FTTP) deployments.

This updated version incorporates changes driven by the Government's Migration Assurance Policy (MAP) and incorporates considerations of changes driven by nbn's Multi-Technology Mix (MTM) approach incorporating Fibre to the Node (FTTN), Fibre To The Building (FTTB) and Hybrid Fibre Coaxial (HFC) access technologies.

Background

The deployment of Australias upgraded broadband network will create significant change within the Australian telecommunications environment. NBN Co Limited (nbn), a wholly-owned Commonwealth company, is responsible for ensuring all Australians have access to high speed broadband as soon as possible. It operates on a wholesale-only, open access basis.

The structural separation of Telstra and the transition from existing networks to nbn's network represents a significant structural change to the delivery of fixed line telecommunications services in Australia.

The extent of the change and the process of migration raise a number of potential challenges in relation to the provision of some existing legacy services, in particular medical alarms, fire alarms and lift emergency phones connected to monitoring centres via existing copper networks.

Under Telstra's Migration Plan, originally approved by the Australian Competition and Consumer Commission (ACCC) in February 2012 with subsequent amendments Telstra is required to no longer supply most types of fixed line telecommunications services to retail Customers over its copper and HFC networks in areas where nbn's network has been declared Ready for Service (RFS) for 18 months.

As nbn's network rollout occurs on a region by region basis, there is an 18 month period (migration window) from the date a region is declared RFS by nbn, until the Disconnection Date (DD) of the existing legacy copper network. During the migration window, most copper based services subject to disconnection will either be migrated to the nbn (or other networks) or be disconnected at the end of the 18 month migration window. There are some exemptions to this – including some 'Special Services' (mostly business-related services) which are subject to a different disconnection arrangement.

On 23 November 2014, the disconnection commencement dates came into effect for the first 15 rollout regions connected to nbn's fixed network. Retail voice and broadband services began migration to RSPs nbn network-based products from this time and, in accordance with its Migration Plan, Telstra commenced disconnection of the copper network in these regions and other regions that have passed their DD.

This Guideline draws on the migration experience of Telstra, nbn and industry with these early rollout regions.

Purpose of this Guideline

The existing 18-month migration period, with mandatory disconnection from Telstra's fixed networks at the end of that migration window, provides a solid framework for successful migration to nbn's network (or other similar networks). However, experience to date has shown that a successful migration ahead of mandatory disconnection will only occur if certain fundamentals, for example, serviceability of premises, retail product availability, Customer awareness, and industry participation, occurs early in the process.

The purposes of this Guideline are to:

(1)   set out for information purposes how the different tasks associated with migration to nbn's network are allocated between the Industry stakeholders involved in the process, including nbn, Telstra, RSPs, ASPs, MASPs, Customers and the Department of Communications and the Arts;

(2)   document certain industry agreed practices, processes and solutions for Industry stakeholders to undertake, to smoothly manage the migration of Customers and services to nbn's network; and

(3)   provide a minimum set of standards for the provision of information by Industry stakeholders to affected Customers in relation to the migration process.

The diagram below illustrates how industry-led arrangements set out in the Guideline fit within the broader migration policy framework and play a critical role in the migration and disconnection lifecycle. There are three key phases:

(1)   Phase 1: pre-RFS activities

(2)   Phase 2: migration window (RFS to DD)

(3)   Phase 3: post DD

This Guideline's primary focus is on Phase 2 (the migration window) although it does include some detail of activities in Phases 1 and 3 for ease of understanding the end to end migration process.

FIGURE 1
NBN Migration Management Lifecycle (FTTP)
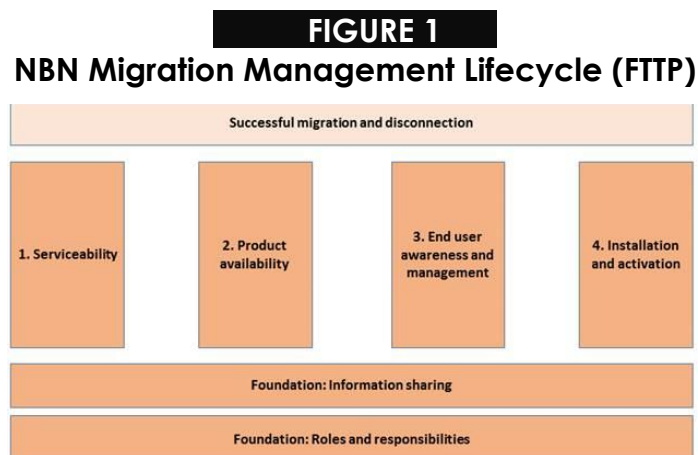
Mike North – Chair 2016
WC63 – NBN Migration Management Working Committee

TABLE OF CONTENTS

1 GENERAL

1.1 Introduction

1.1.1   This Guideline:

(a)   sets out for information purposes the roles and responsibilities of each relevant party, that is, Telstra (as copper network owner, a major telecommunications service wholesaler and an RSP), RSPs, nbn, MASPs and ASPs within the migration process (Chapter 3);

(b)   documents certain industry agreed practices, processes and solutions for RSPs, ASPs and MASPs to undertake, in conjunction with nbn and Telstra, in order to smoothly manage the migration of Customers and services (including medical alarms) to nbn's network (which may also include the possibility of a delegated Case Management process for the management of the subset of Customers not able to be managed by RSPs for a variety of reasons) (Chapter 4); and

(c)   provides a minimum set of standards for the provision of information by RSPs and MASPs to their residential Customers in relation to the migration process (Chapter 5).

1.1.2   The Guideline is intended to take into account the MAP (as issued by the Government from time to time) and the implications of any related Government decision-making for the migration process.

1.1.3   The development of the Guideline has been facilitated by Communications Alliance through a Working Committee comprising representatives from the telecommunications industry.

1.1.4   The Guideline should be read in conjunction with related documents and industry codes, including:

(a)   The *Telecommunications (Migration Plan Principles) Determination 2015* and the *Telecommunications (Migration Plan - Specified Matters) Instrument 2015*;

(b)   Telstra's Migration Plan, approved by the ACCC in February 2012, as subsequently varied;

(c)   nbn's Wholesale Broadband Agreement (WBA);

(d)   nbn's Special Access Undertaking, which was approved by the ACCC in December 2013;

(e)   The Migration Assurance Policy (MAP) statement and framework issued by the Minister for Communications on 1 February 2016;

(f)   The revised Statement of Expectations issued to nbn by the Minister for Communications and Minister for Finance on 8 April 2014; and

(g)   The *Telecommunications Consumer Protections* Code (C628:2015).

1.1.5   The Guideline should be read in conjunction with related legislation, including:

(a)   the *Telecommunications Act 1997 (Cth)* (the Act);

(b)   the *Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth)*;

(c)   the *Competition and Consumer Act 2010 (Cth);* and

(d)   the *Privacy Act 1988 (Cth).*

1.2   Scope

1.2.1   The Guideline applies to the Carriage Service Providers section of the telecommunications industry under section 110 of the Act.

1.2.2   It deals with the following telecommunications activities as defined in section 109 of the Act:

(a)   carrying on business as a Carrier; or

(b)   carrying on business activities as a Carriage Service Provider (CSP); or

(c)   supplying Goods or Service(s) for use in connection with the supply of a Listed Carriage Service.

1.2.3   For clarity, the following matters are outside of the scope for this Guideline (other than to the extent that they are included in the description of the various roles and responsibilities of stakeholders in Section 3):

(a)   Matters relating to Telstra's mandatory disconnection processes and other matters dealt with in Telstra's Migration Plan.

(b)   Matters dealt with in the Definitive Agreements between Telstra and nbn.

(c)   Matters dealt with in nbn's Special Access Undertaking.

(d)   Contractual arrangements between nbn and its RSPs (i.e. governed by the WBA) and Telstra and its wholesale customers.

1.3　Objectives

1.3.1　The objectives of the Guideline are to:

(a)　identify all relevant stakeholders in relation to the copper to nbn fixed network migration process;

(b)　determine each stakeholder's role and responsibilities in the end-to-end migration process;

(c)　document an efficient industry process to ensure migration from copper to an RSP's nbn network based products will be performed with minimum disruption to Customer's service and with minimum cost imposition to the industry for this activity; and

(d)　outline the approach in relation to Customer management and communication through the migration process for each Customer group identified.

1.4　Guideline review

1.4.1　The Guideline will be further reviewed if necessary to incorporate further changes required based on experience of nbn's multi-technology mix access technology deployment.

1.4.2　Once the above review has been finalised, the Guideline will be reviewed every 5 years or earlier in the event of significant developments that affect the Guideline or a chapter within the Guideline.

2 ACRONYMS, DEFINITIONS AND INTERPRETATIONS

2.1 Acronyms

For the purposes of the Guideline:

ASP

means Application Service Provider

BAU

means Business As Usual

DD

means Disconnection Date

FSAM

means Fibre Serving Area Module

HFC

means Hybrid Fibre-Coaxial

HFL

means the Historical Footprint List

MAP

means Migration Assurance Policy

MAR

means Medical Alarm Register

MASP

means Medical Alarm Service Provider

NTD

means Network Termination Device

PIM

means Public Information on Migration

PFL

means the Proposed Footprint List

PSTN

means Public Switched Telephone Network

RFS

means ready for service

RSP

means Retail Service Provider

SAM

means Service Area Module

SDT

means Soft Dial Tone

SQ

means Site Qualification

WBA

means nbn's Wholesale Broadband Agreement.

2.2 Definitions

For the purposes of the Guideline:

Act

means the *Telecommunications Act 1997 (Cth)*.

Application Service Provider

means a service provider providing an over the top service, such as a monitored medical alarm service, a fire alarm monitoring service or a lift emergency phone monitoring service. Medical Alarm Service Providers are a particular type of ASP.

Business Day

means a day commencing at 8.00 am and ending at 5.00 pm, other than:

(a)   a Saturday or Sunday; or

(b)   a day which is a public holiday in the place where work is required.

Carriage Service Provider

has the meaning given by section 7 of the Act.

Carrier

has the meaning given by section 7 of the Act.

Case Management

means RSP and MASP Customer management activities that are undertaken to assist the Customer migration to nbn's network.

Customer

is the Customer or the Customer's authorised agent or representative, in whose name the account is established, or will be established, with an RSP for the supply of nbn network-based products or services.

Delegated Case Management

means Case Management where the functions are performed by a party other than the Customer's RSP or MASP.

Disconnection Date

means the date on which the existing legacy HFC and copper services are to commence managed disconnection arrangements in accordance with Telstra's Migration Plan.

Fire& Lift Register

means nbn's established fire alarm and lift emergency phone register located on nbn's website at www.nbnco.com.au/fireandlift that enables the registration of the location of fire and lift services (including the mandatory provision of the relevant services phone number). Two registration methods are available, the first as a public website where building managers can register their buildings and provide monitored fire alarm and lift emergency phone information (including the phone numbers of those services and contact details of the person registering) and secondly, as an industry bulk registration method, where ASPs can register the premises where they are aware of the presence of monitored fire alarm and lift emergency phone services.

Historical Footprint List

means an address list provided by nbn to WBA signatories that details the then current Rollout Regions, including the address information and the service class for each premises included in that list.

In-train Order

means an order for an nbn service at a premises that has been accepted by nbn either prior to the Rollout Region DD or by 25 business days after the Rollout Region DD, which is more particularly defined in Telstra's Migration Plan. Lists of In-train Order premises are collated by nbn and provided to Telstra at defined milestones (Disconnection Date and Disconnection Date + 26 business days), whereupon Telstra Wholesale then arrange to provide to impacted Wholesale customers.

Legacy Services

means services that currently operate over the copper network, prior to migration to nbn's network, including traditional voice and data services supplied using the public switched telephone network (PSTN) bandwidth and over the top services.

Managed Disconnection Service Profile

means the customer specific list of services (PSTN or Unconditioned Local Loop) provided by Telstra Wholesale to its Wholesale customers after the DD that details the status of those Wholesale services which are subject to managed disconnection arrangements.

Medical Alarm Register

means nbn's established medical alarm register (located on nbn's website at www.nbnco.com.au/medicalregister) that enables the registration of premises with medical alarms (both monitored or unmonitored autodiallers). Two registration methods are available, the first as a public website where end users with medical alarms can register a premises where a medical alarm is present (including contact details of the person registering) and secondly, as an industry bulk registration method, where medical alarm service providers can register the premises where they are aware of the presence of a medical alarm.

Medical Alarm Service Provider

means a provider of monitored medical alarms to Customers who are predominantly connected to monitoring centres via existing copper based public switched telephone networks.

Migration

means the movement of a service from a legacy copper or HFC network to another network (e.g. nbn's network).

Migration Assurance Policy

means the MAP issued by the Minister for Communications following industry consultation.

Migration Window

means the period of time between nbn declaring a region RFS and its associated Disconnection Date.

nbn

means NBN Co Ltd.

Proposed Footprint List

means the list of addresses published by nbn as part of its RFS Rollout Plan for Premises which nbn expects will be ready for service within 6 months after the date of publication.

Special Services

has the meaning given to that term in the Telstra Migration Plan, approved by the ACCC in February 2012.

2.3 Interpretations

In the Guideline, unless the contrary appears:

(a) headings are for convenience only and do not affect interpretation;

(b) a reference to a statute, ordinance, code or other law includes regulations and other instruments under it and consolidations, amendments, re-enactments or replacements of any of them;

(c) words in the singular includes the plural and vice versa;

(d) references to nbn's network should also be interpreted as also applicable to other non-nbn networks which also provide open access fixed network wholesale services;

(e) words importing persons include a body whether corporate, politic or otherwise;

(f) where a word or phrase is defined, its other grammatical forms have a corresponding meaning;

(g) mentioning anything after include, includes or including does not limit what else might be included;

(h) words and expressions which are not defined have the meanings given to them in the Act; and

(i) a reference to a person includes a reference to the person's executors, administrators, successors, agents, assignees and novatees.

3 MIGRATION ROLES AND RESPONSIBILITIES

3.1 Overview

This section sets out for information purposes a description of the various roles and responsibilities of industry stakeholders at key milestones in the migration process.

3.2 Industry Migration Responsibilities – Connection (Phase 1 & 2)

TABLE 1
Migration Connection Responsibilities

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
Stage 1	**Forecast RFS date.** nbn provides a monthly RFS rollout plan which forecasts RFS dates approximately 12 months ahead of declaring a region to be RFS.	Approximately12 months ahead of RFS declaration (specific changes/updates can occur after this date)	nbn
Stage 2	**Declaration that a region is RFS.** nbn declares the date when the region is RFS and this is the date that the copper disconnection will be based on, and works to promote serviceability of premises within a rollout region as soon as practicable. The	RFS date	nbn

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
	Disconnection Date (DD) is then set as the date that is approximately18 months from region RFS date, noting the number of DDs occurring each month is consolidated for simplicity of customer management.		
Stage 3	**Publicise that the region is RFS.** nbn will run public awareness activities to affected premises regarding network migration and the actions required to migrate. This communication will be supported by other relevant stakeholders in the industry such as Telstra, RSPs, ASPs, MASPs and community groups. nbn will provide key messaging for consistency in communications including detail on cease sale dates.	RFS date through to DD	nbn and other relevant Industry stakeholders
Stage 4	**Identify impacted Customers.** The RSPs will identify the customers that can be serviced by nbn's network based on nbn's rollout information, nbn's network	RFS date through to DD	RSPs

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
	coverage information and nbn's network serviceability information matched to the RSPs' own information.		
Stage 5	**Conduct marketing campaigns.** RSPs will run marketing campaigns targeting nbn network serviceable Customers in the relevant region to encourage early migration.	RFS date through to DD	RSPs
Stage 6	**Initiate Migration.** Assess Customer requirements, and accept order for RSP's nbn network-based retail service.	RFS date through to DD	RSPs
Stage 7	**Deliver nbn network-based service.** nbn and RSPs will coordinate delivery of an RSP's nbn network-based service with Customers (including specific installations performed at customer premises). nbn will promote serviceability of premises and deliver the layer 2 wholesale service that	RFS date through to DD (or the connection of an In-train Order post DD)	nbn (layer 2 wholesale service) and RSPs (retail service)

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
	RSPs can use as a base building block to create their own retail nbn network-based products and services and deliver these to Customers.		
Stage 8	**Deliver ASP services (e.g. medical alarm and monitored fire alarm and lift emergency phone services) where applicable.** The ASP / MASP will work with Customers to migrate ASP services, including testing their operation on RSPs nbn network-based services, if applicable, and resolve any issues in relation to ASP service implementation.	RFS date through to DD	ASPs / MASPs
Stage 9	**Initiate copper cancellation.** Once an RSPs nbn network-based service is delivered by both nbn (Layer 2 service) and the RSP (retail service), copper cancellation will be initiated by the RSP.	RFS date through to DD (also noting that cancellation orders for copper services may continue to be raised beyond DD e.g. for In train Orders.	RSPs
Stage 10	**Cancel copper services.**	RFS date through to DD (also noting that	Telstra Wholesale

Migration Stage - Connection	Tasks	Timing	Responsible Industry Sector
	In accordance with the Migration Plan, Telstra will action copper cancellation on receipt of an order to do so. All other associated processes in relation to the cancellation of copper such as ULL hand back and copper billing termination will also follow.	cancellation orders for copper services may continue to be raised beyond DD e.g. for In train Orders).	

3.3 Industry Migration Responsibilities – Disconnection (Phase 2 & 3)

Table 2 outlines the arrangements in place for FSAMs 32 and beyond (for which the first DD occurred on 20 February 2015).

NOTE: Full details of Telstra's disconnection obligations are contained within the published Telstra Migration Plan.
Readers are also advised that the below arrangements may be subject to change. Telstra Wholesale customers should consult Telstra Wholesales online portal for updates.

TABLE 2
Migration Disconnection Responsibilities

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
Stage 1	**Publish nbn region RFS rollout plan**	Approximately 12 months ahead of RFS declaration (specific changes/updates can occur after this date)	nbn
Stage 2	**Publicise the disconnection date** nbn will run public awareness activities to affected premises regarding the migration and the actions required to migrate. The activity needs to be supported by other relevant stakeholders in the industry such as Telstra, RSPs, ASPs, MASPs and community groups. nbn will provide key messaging for consistency in communications.	RFS date through to DD	nbn
	In accordance with the Migration Plan, Telstra will publish a Disconnection Schedule which includes setting out Rollout Region Ready for Service Dates and Disconnection Dates. This information is publicly available	Updated within 5 business days of relevant trigger event	Telstra Wholesale

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	on the Telstra Wholesale website.		
Stage 3	**Notification of copper services due to be disconnected on DD** Telstra's current process is to publish a Disconnection Notification for copper services relevant to each RSP that are due to be disconnected on DD. This information will help the RSP to identify and verify the services that are pending disconnection. The list includes all services managed by the RSP as identified by Address, Location ID, Service ID and/ or FNN etc. This information is published on Telstra's portal.	DD-6 months through to DD-1 month (under the Migration Plan, the only requirement during this time is to provide a Disconnection Notification between DD-4 and DD-3 months)	Telstra Wholesale
Stage 4	**Verify the disconnection list** The RSPs will check Telstra's disconnection list against its own information to ensure that they match and will resolve any mismatches in information with Telstra.	DD-6 months through to DD	RSPs Telstra Wholesale

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
Stage 5	**Inform Customers of pending disconnection by various stakeholders** nbn will communicate to the affected Customers at a premises level (not a service level) of the pending copper disconnection. This is done via various methods (see section 5.1).	DD-6 months to DD	nbn
	The RSPs should contact Customers on the disconnection list via contact methods deemed appropriate by each RSP. The RSPs' should use reasonable endeavours to contact the Customer at least 3 times with clear messaging regarding the pending disconnection of copper.	DD-6 months to DD [At least 3 contacts]	RSPs
	Department of Communications and the Arts is responsible for contacting Customers who have voice only copper services to inform them of pending disconnection. This is done via mail.	DD-6 months to DD; [At least 2 contacts]	Department of Communications and the Arts

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	ASPs and MASPs will contact their Customers regarding copper disconnection which could potentially affect their medical alarms or monitored fire alarm or lift emergency phone services.	DD-6 months to DD [At least 3 contacts]	ASPs / MASPs
	nbn to update the Medical Alarm Register or Fire & Lift Register as notified by Customers, ASPs and MASPs. nbn to provide details of registered services to Telstra.	DD-6 months to DD+25 business days	nbn
Stage 6	**Provide In-train Order information and Managed Disconnection Service Profile** In accordance with the Migration Plan nbn will provide any In-train Order information to Telstra on DD. Telstra will provide a Managed Disconnection Service Profile to RSPs if there are any active services remaining which are not associated with an In-train Order. The profile also includes any services that are notified	nbn will provide on DD. Telstra will provide no later than DD + 6 Business Days.	nbn Telstra Wholesale

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	by nbn to Telstra as having a medical alarm and monitored fire alarm or lift emergency phone service(s) operating over that service. Telstra will also send the RSP specific In-train Order information.		
Stage 7	**Initiate temporary disconnection process** In accordance with the Migration Plan the active copper services remaining at DD (other than exempt services such as those on the In-train Orders list and, until 1 July 2017, those registered services used to supply monitored fire alarm or lift emergency phones) will be subject to temporary disconnection. Copper voice line rental services will have a soft dial tone applied (and for ULL services this will be applied by the RSP). SDT is applied as a final step to encourage Customers still relying on the copper service, to take immediate action to migrate to	No later than DD+15 Business Days	Telstra and RSPs

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	a RSPs nbn network-based service.		
Stage 8	**Provide updated In-train and Order and Registered Alarm information** In accordance with the Migration Plan nbn will provide Telstra with an updated list of In-train orders, including those that have been placed from DD. Additionally, nbn will also provide an updated list of services registered for medical alarm and monitored fire alarm or lift emergency phone services.	DD+26 Business Days	nbn
Stage 9	**Provide updated Managed Disconnection Service Profile and commence the managed disconnection of legacy copper service** In accordance with the Migration Plan Telstra will provide RSPs with an updated Managed Disconnection Service Profile and commence the managed disconnection of all eligible copper services	Profile to be provided. No later than DD+28 business days Managed Disconnection will commence from DD+ 30 days (to be completed no later than DD + 45 Business Days).	Telstra Wholesale

Migration Stage - Disconnection	Tasks	Timing	Responsible Industry Sector
	within the relevant rollout region (other than exempt services such as those on the In-train Orders list and, until 1 July 2017, those registered services used to supply monitored fire alarm or lift emergency phones).		
Stage 10	**Monitor completed disconnections** RSPs will monitor their customer disconnections via the Managed Disconnections process that have completed, through the disconnected services list provided by Telstra Wholesale. All active services will be displayed within the service profiles until they are disconnected at the final disconnection date and refreshed on a weekly basis.	Post DD + 6 Business Days.	Telstra Wholesale RSPs

4 CUSTOMER MIGRATION PROCESS

Overview

This Chapter provides guidelines for migration and migration assurance processes in relation to all stakeholders involved in migrating Customers' services from legacy copper networks to RSP's nbn network-based products and services.

This guidance is largely based on the migration experiences of stakeholders in the initial nbn FSAMs. The aim of this Guideline is to outline minimum activities that industry (including nbn's RSP customers, wholesale customers of legacy network operators (who provide legacy services), MASPs and ASPs) should undertake when developing their own nbn network Customer migration and management processes.

There are numerous parties who have a role to play in the migrating of services to nbn's network and ensuring that Customers have been appropriately informed of the implications of the migration. nbn (as the wholesale network operator), Telstra (as copper owner, a major telecommunications service wholesaler and an RSP), RSPs, MASPs and ASPs all have a role to play in migration activities.

The processes set out in this Guideline provide no guarantee that serious adverse consequences will be averted during the migration process. However, if followed, the Guideline should minimise the likelihood of such consequences occurring. Clearly, each RSP, ASP and MASP must satisfy itself that its efforts are sufficient to successfully migrate their Customers to nbn's network and manage any risks associated with the mandatory disconnection of their Customers remaining on the existing copper network at the DD. The objective of this Guideline is to establish, with the Industry, the roles and responsibilities of all parties along with a benchmark for these migration processes and Customer management activities.

In order to allow Customers a sufficient amount of time to migrate to RSP's nbn network-based products, an 18 month migration window has been prescribed from the FSAM RFS date to the mandatory DD for a particular region. During this period the Customer's RSP and MASP should make attempts to communicate with Customers and assist them in migrating early in the migration window and well ahead of their DD, so they are not left without a working service at the end of the 18 month migration window.

The experience in nbn's initial FSAMs has highlighted the need to take extra care with certain categories of Customers as they migrate to nbn's network. These additional activities are called out in the Guideline under Customer management. The Guideline suggests that additional support may be provided to assist migration of customers with active copper lines and medical alarms. Priority assistance Customers are also identified as requiring special attention before and during the migration.

This chapter will define the responsibilities of RSPs, ASPs, MASPs, Telstra and nbn in the management of Customers, and some minimum steps that should be taken before the relevant DD. This Guideline does not require an RSP, ASP or MASP to migrate their Customers onto RSPs nbn network-based products; however, it does seek to set out the activities that should be undertaken to ensure a successful migration off the copper network.

The Department of Communications and the Arts established a Fire Alarm and Lift Phone Migration Roundtable to effect implementation of the Australian Government's policy framework for the migration of monitored fire alarms and lift emergency phone services from the copper network to the nbn and to support service continuity outcomes during the migration of these services. One of the outputs of this work is the development of a Good Practice Guide for the migration of these services, anticipated during 2016. On the publication of the Good Practice Guide, this Guideline will be reviewed to ensure consistency in the information being provided to stakeholders.

All relevant stakeholders are encouraged to adopt the processes and arrangements set out in this chapter to minimise erroneous disconnections and to help Customer migration process.

4.1 End User migration assumptions and principles

4.1.1 Migration Assumptions

1. RSPs are responsible for their Customers and should take reasonable measures to manage their Customers' Migration during the18 month migration window. Cancellation of any existing copper based services is the responsibility of the current RSP throughout the BAU Migration window.

2. RSPs do not have control or visibility over MASP and ASP supplied services.

3. ASPs and MASPs are responsible for their Customers and should take reasonable measures to manage their Customers' Migration, acknowledging that ASPs and MASPs do not have control or visibility over RSP supplied services.

4. The goal is to ensure there are no remaining active copper services without an In-Train Order at DD, unless the Customer with that active copper services is happy for it to be disconnected without a fixed line replacement service.

5. If a Customer places an order for an RSP's nbn network-based service, they should not, through no fault of their own, lose access to existing copper based fixed line services until their new service has been connected (noting this should not be inconsistent with Telstra's timeframes and obligations to disconnect as outlined in Telstra's Migration Plan).

6. The minimum industry standard should be efficient and scalable.

7. nbn will announce a region as RFS, which will trigger the start of the 18 month migration window. Certainty around FSAM disconnection dates is required (without extension) to ensure industry focus.

8. At the end of the 18 month migration window, Telstra is required (under the Migration Plan) to disconnect copper and Telstra's HFC fixed line carriage services (other than

exempt services). Exempt services include for example Special Services.

9. The Guideline should suggest process solutions to ensure Customer messages are consistent across all parties that may interact with Customers *[compare to IGN 004 Appendix A, B and C "recommended messages"]*.

4.1.2   Customer Management Responsibilities

1.   **nbn**

nbn is responsible for:

(a)   the rollout of nbn's network, providing information to RSPs concerning current and future nbn network coverage areas and making premises serviceable. The details surrounding premises serviceability and corresponding information flows is contained in the WBA;

(b)   providing wholesale layer 2 services that RSPs can use as building blocks to create their own retail nbn network-based products and services which are capable of supporting the migration of existing copper based services ahead of the commencement of disconnection of the relevant services;

(c)   delivering public information activities supporting migration readiness including providing advance notification of the planned migration to affected residents and the actions required to migrate; and

(d)   in the case where an RSP opts out of managing a particular Customer, nbn (or another Authority) may refer the Customer to another RSP. Potential processes for references in these circumstances, including process owner, process timing and ensuring compliance with non-discrimination obligations, are currently being considered.

2.   **Telstra**

Telstra, as the disconnecting party, is responsible for:

(a)   publishing the disconnection schedule containing the disconnection dates for the relevant FSAMs;

(b)   communicating to its Customers regarding the DD (including its Wholesale Customers); and

(c)   performing disconnection related activities as described in the Migration Plan.

3.   **RSPs**

RSPs are responsible for:

(a)   informing their customers of the impact, or likely impact, of the need to migrate and copper disconnection on their products and services;

(b) educating their Customers of available product options as an alternative to the legacy telecommunications services being disconnected;

(c) migrating Customers to a product alternative as agreed with the Customer; and

(d) managing any billing, account management or other customer relationship issues associated with their own Customers.

RSPs who become aware that a Customer who is migrating to an RSP's nbn network-based service has a medical alarm or monitored fire alarm or lift emergency phone should:

(e) encourage the Customer to contact their MASP to ensure that the medical alarm or monitored fire alarm or lift emergency phone will continue to operate post-Migration; and.

(f) encourage the Customer to register on nbn's Medical Alarm Register or Fire & Lift Register before or as early as possible in the migration window.

Business Customers

Business customers may have multiple voice services greater than the number of voice ports (2) available with the supply of nbn's FTTP NTD as well as data services.

In some cases a business customer may need to upgrade existing in-premises equipment or purchase additional in-premises equipment. Additionally some business customers take the opportunity to change RSPs as part of their upgrade of equipment and this may add complexity to the cutover to nbn such as complex porting and changes to their services acquired.

This may require capital expenditure and/or approval procedures within their business that have not been anticipated within the Migration Window.

As such, a small number of business customers may need additional time to allow for their in-premises equipment to be upgraded to utilise nbn network based services. The In-train Order process provides additional time for business service migrations. Where nbn serviceability and individual business customer circumstances allow, end users should be encouraged by their RSPs to plan the migration of services early in the migration window.

Due to the complexity of the migration of business services it is important that industry participants take into account the migration processes outlined in IGN 008 NBN FTTB/N Migration Processes.

Priority Assistance

RSPs are responsible for informing Customers whether they are able to offer a Priority Assistance service. For those RSPs who do offer a Priority Assistance, they are responsible for informing the relevant Priority Assistance Customers of the impact, or likely impact, of Migration on their services.

Special Services

Where applicable, RSPs are responsible for identifying which of their existing services should be classed as Special Services (or Special Service Inputs) and certify those Special Services with Telstra Wholesale to ensure those services are exempt from mandatory copper disconnection. A full list of Special Services can be found at
www.telstrawholesale.com.au/nbn/exemptions/index.htm

4. **Multiple RSPs**

Where Customers have different RSPs for voice and internet services, both RSPs will have responsibility for communicating with the Customer in relation to the product that they are providing.

5. **Non-nbn RSPs**

RSPs who are active in the current telecommunications market but are not providing (or do not intend to provide) RSP services based on nbn's network are responsible for informing their Customers of the pending disconnection of their existing copper based services and the need to switch to an RSP who will be offering nbn network-based services should the customer wish to maintain a service.

6. **ASPs**

ASPs are responsible for:

(a)   safely migrating, and providing continuity of service for, their own Customers' services during the Migration Window;

(b)   informing their own Customers about the impact, or likely impact, of Migration on their services and premises;

(c)   where applicable, registering their Customers on the Fire & Lift Register before or as early as possible within the Migration Window;

(d)   any installation or upgrading of wiring or Customer premises equipment associated with Migration of their own customers (or Customer premises);

(e)   any billing, account management or other customer relationship issues associated with their own Customers; and

(f)   advising their Customers of the features of services provided by RSPs that their services need in order to operate.

7.   **MASPs**

MASPs are responsible for:

(a)   informing their Customers about the impact, or likely impact, that Migration will have on the operation and functionality of their medical alarm devices;

(b)   registering their Customers on the Medical Alarm Register before or as early as possible within the Migration Window; and

(c)   taking reasonable steps to ensure that their products and services will work on RSPs nbn network-based services post-Migration.

8.   **Medical Alarm Register and Fire Alarm & Lift Register Owner**

Where contact details have been provided, the Medical Alarm Register and Fire & Lift Register owner may contact individual registrations on those Registers to provide information, answer questions and encourage them to contact their ASP and RSP.

5   INFORMATION MANAGEMENT

5.1   Overview

Approximately 3 years out from the declaration that a rollout region is RFS, nbn commences communication of forecast network rollout activities to RSPs and separately, via the Public Information for Migration (PIM), to Customers. The level of detail released, and its accuracy regarding construction timeframes, the location and number of premises to be served increases as the RFS date approaches.

nbn provides various rollout plans with increasing granularity to RSPs under an executed Wholesale Broadband Agreement (WBA). This supports forward planning for any required infrastructure support and awareness activity planning for existing Customer migration in these areas. The PFL provides early notice of the detailed future coverage area included in each rollout area and the HFL provides the list of premises which have already been declared RFS. The PFL is provided monthly and the HFL is provided weekly (or as updated by the terms of the WBA).

nbn determines serviceability based on its Site Qualification (SQ) system and where a premises is serviceable, RSPs are able to place connection orders.

This Guideline sets out the Customer migration processes and associated information management for nbn network serviceable premises, that is, premises where an nbn wholesale service can be ordered by RSPs. Where a premises is not nbn network Serviceable, which is outside the scope of this Guideline, the matter should be raised by the RSP to nbn, under the processes defined in the WBA.

5.2   Communications Journey

Under the PIM process, nbn provides a communications journey for each RFS area, this includes a variety of direct mail letters and brochures distributed at various points in the migration window as shown in the example Figures 2 and 3 below.

nbn, RSPs and ASPs currently work together to maximise the effectiveness of a consistent communication message and to ensure a coordinated delivery of key messages to end user.

FIGURE 2
Typical Customer Communications Timeline (RSP)

Communications to End Users by RSPs

The RSP will run BAU marketing campaign targeting its customers in the NBN footprint area encouraging early migrations to NBN.

Data: Use the data from NBN HFL filtered for NBN serviceable addresses matched to RSP's own data.

Method:

Contact the customers via direct mail out advising specific disconnection date and also that inaction will result in having no fixed service!

Data: Use both the NBN HFL and Telstra Disconnection Reports matched to RSP's own data.

Method:

Follow the copper disconnection process. Manage customers who contacted the RSPs after copper service is disconnected.

Data: Use Telstra Managed Disconnection Reports matched to RSP's own data, plus any in-train/in flight information received from NBN Co via Telstra.

DD-18 to DD-6 Months   **DD-2 Months**   **AT DD**

DD-6 Months   **DD-1 Month**

Phone Call

Written Communications to Customers

Identify customers have not yet migrated to NBN and start tailoring communications specific to this group.
Data: Use both the NBN HFL and Telstra Disconnection Reports matched to RSP's own data.

Method:

Contact the customers advising the impending disconnection and explain what action needs to be taken immediately. Outbound calls to non-responders.
Data: Use both the NBN HFL and Telstra Disconnection Reports matched to RSP's own data.
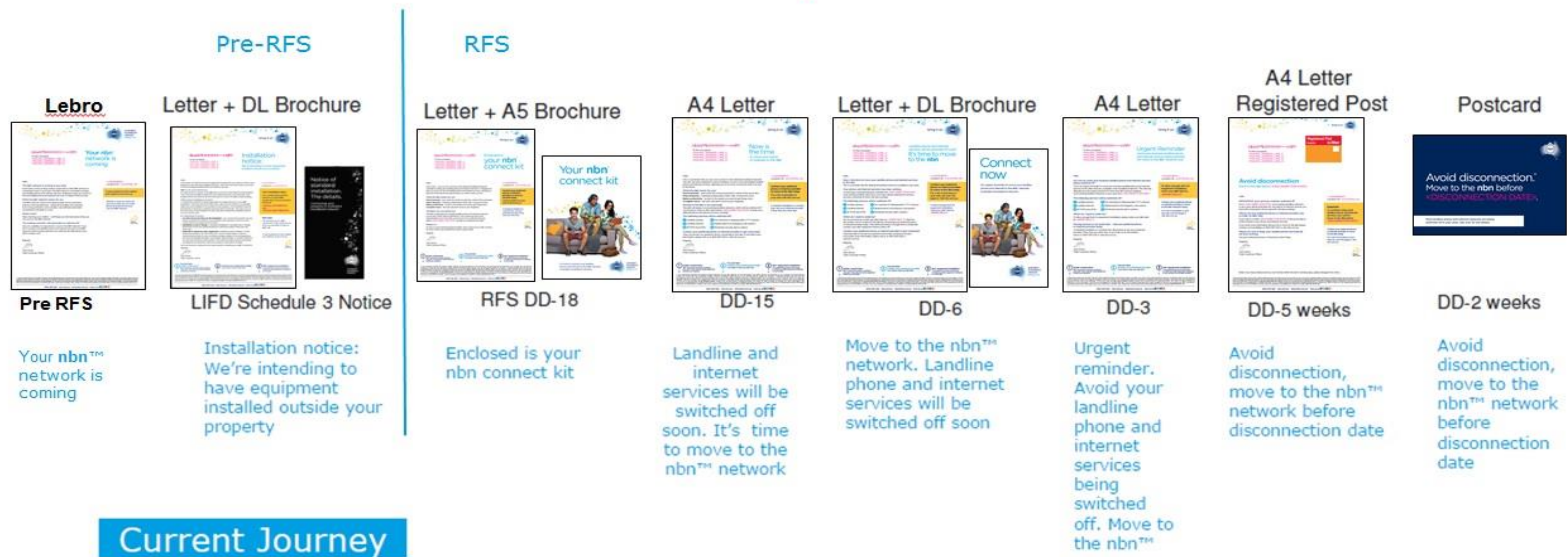
Method

As early as possible in the communications, Customers should be encouraged to register premises with medical alarms or monitored fire alarm or lift emergency phones on nbn's Registers.

FIGURE 3
Typical Customer Communications Timeline (nbn PIM)

5.3   Information Management Requirements

5.3.1   Information provided by Telstra Wholesale to wholesale customers post-RFS date:

(a)   Disconnection Schedule – within 5 business days of nbn declaring a region RFS outlining the relevant disconnection timeline for each SAM, including the cease sale and order stability commencement dates, and disconnection dates;

(b)   wholesale disconnection notifications – details all copper based services still connected to the legacy network within a SAM from DD-6 months. This list is updated regularly and is used by RSPs to manage Customers who are yet to migrate to nbn network based services; and

(c)   Managed Disconnection Service Profile – 6 business days after the DD Telstra notifies each wholesale customer of any wholesale services supplied at Premises on the Managed Disconnection Service Profile that are to be disconnected in the course of Managed Disconnections. This service profile confirms whether the service is located at an end-user premise which is an In-train Order as notified to Telstra by nbn immediately following the DD, in addition to whether the service is located a premise as having an identified medical alarm or monitored fire alarm or lift emergency phone as also notified to Telstra by nbn. The service profiles are currently updated on a weekly basis, and a further update to In-train order information is confirmed at DD+28 business days following the update to Telstra by nbn as at DD+26 business days.

5.3.2   Information provided by RSPs to Telstra Wholesale post- RFS date:

(a)   certification of Special Services and special service inputs to be provided to Telstra Wholesale as these services are not subject to mandatory disconnection; and

(b)   providing Telstra Wholesale with requests to disconnect existing copper based services as per BAU process.

5.3.3   Information provided by Customers and ASPs to nbn:

(a)   Medical Alarm Register and monitored fire alarm or lift emergency phone registrations

It is currently the responsibility of Customers to individually register premises with medical alarms or for the ASPs to register premises where they are aware of the presence of medical alarms or monitored fire alarms or lift emergency phones. nbn then provides certain Medical Alarm Register and monitored fire alarm or lift emergency phone information to Telstra Wholesale.

5.3.4   Information provided by ASPs to Customers:

(a)   communicating with Customers about their services and compatibility with RSPs nbn network-based RSP services; and

(b) encouraging Customers to register premises with medical alarms or monitored fire alarm or lift emergency phones on nbn's Registers.

5.3.5 Information provided by RSPs to Customers post-RFS date:

(a) appointment times where applicable;

(b) alternative retail product and service information as replacement to legacy services; and

(c) copper disconnection dates and process (from the Customer's perspective).

5.3.6 Information provided by nbn to Customers post-RFS date:

(a) PIM / public awareness activity; and

(b) communications to Customers on the nbn's Registers (where contact details are provided).

5.4   Allocation of Customer Communications Responsibilities

Customer Communications Responsibilities

Timeline	Required Communications	Method	Data	Responsible Industry Stakeholder
Pre-RFS date to DD	General awareness campaign	Online and other channels as required.	nbn region RFS rollout plan and other data	nbn
RFS date + 5 business days	In accordance with the Migration Plan, publication and communication of a disconnection schedule, setting out DD for all those rollout regions (upon the RFS date having been published by nbn).	Publish on Telstra's website and also inform RSPs directly through the BAU communications channel.	nbn region RFS rollout plan and announcement.	Telstra
RFS date to DD	Advance notification of the requirement to migrate to end users who are on a service to be migrated, and the actions required to migrate.	nbn will run public awareness activities to affected residents. nbn will provide key messaging to relevant stakeholders in the industry such as Telstra, RSPs, MASPs, community groups for consistency in communications.	nbn region RFS rollout plan and announcement. Other relevant support groups' own data.	nbn Other relevant stakeholders
Pre-RFS date to DD	Notification about the existence and availability of the Medical	Communication methods may vary between ASP and MASPs; written	ASPs / MASPs own data utilising the utilising published	ASPs / MASPs

Timeline	Required Communications	Method	Data	Responsible Industry Stakeholder
	Alarm Register and Fire & Lift Register	communication is recommended.	information about the nbn rollout	
RFS date to DD-6 months	BAU marketing campaign targeting Customers in nbn network footprint area encouraging early migrations.	Communication methods may vary between RSPs, may take the format of written, verbal, public advertising, internet advertising or any other methods.	Use the data from nbn's network published information filtered for serviceable addresses matched to RSP's own records.	RSPs
DD-6 months	Direct notification highlighting pending disconnection of copper to Customers.	Communication methods may vary between RSPs; written communication is recommended.	Use both nbn's network published information and Telstra Disconnection Reports matched to RSP's own data.	RSPs
Between DD-6 and DD-5 months	Notification to voice only Customers.	Written communication.		Department of Communications and the Arts
Between DD-3 and DD-2 months	Notification to voice only Customers.	Written communication.		Department of Communications and the Arts
DD-2 months	Customers remaining on copper services are contacted to advise them of the specific DD and also that inaction will result in having no fixed service.	Communication methods may vary between RSPs, may take the format of written, verbal, public advertising, internet advertising or any other methods.	Use both nbn's network published information and Telstra disconnection reports matched to RSP's own data.	RSPs
DD-1 month	Specific contact may be made with the non-respondent Customers advising them of the	Communication methods may vary between RSPs. An outbound call to all	Use both nbn's network published information and	RSPs

Timeline	Required Communications	Method	Data	Responsible Industry Stakeholder
	impending disconnection and explaining what action needs to be taken immediately.	Customers on the disconnection list who has not taken any actions to migrate is recommended.	Telstra disconnection reports matched to RSP's own data.	

6 NBN'S NETWORK ACCESS TECHNOLOGIES

Under nbn's MTM model, several different access technologies are used to connect premises. Some of these are defined as fixed networks, and thus will trigger the mandatory disconnection of legacy copper services.

Details of these fixed network replacements and the in-premises equipment required is summarised in the following table:

nbn's access technology	Fixed network replacement? (i.e. does Migration Plan apply?)	nbn supplied in premises NTD?	nbn supplied UNI-V port?	nbn supplied in premises battery back up?	RSP/end user supplied in-premises gateway? (note: equipment required will vary by RSP)
FTTP	Yes	Yes	Yes	optional	Yes & No
FTTN/B	Yes	No	No	No	Yes
HFC	Yes	Yes	No	No	Yes

Each of the fixed network replacement scenarios should be considered in conjunction with the guidance provided in Section 7.

NOTE: Readers should be aware nbn has not yet launched its HFC Access Service. Final details may be subject to change.

7 OPERATION OF nbn BASED SERVICES UNDER A POWER OUTAGE

Under nbn's MTM model, different technologies require different in-premises equipment. As nbn is only providing a wholesale layer 2 capability, much of the in-premises equipment required to provide a functioning end user service is not supplied by nbn. This in-premises equipment would need to have its own battery back-up to continue to operate in a power outage, where nbn has provided power resiliency of differing durations in its networks. As such, nbn is unable to advise which services will and will not operate, or for how long, during a power outage at an end users premises.

The simplest message to end-users is *"telephone and internet services over the nbn network are unlikely to work during a power outage. End-users should consider keeping alternative communications technology such as a charged mobile phone"*.

It is recommended that RSPs and ASPs communicate this message to their customers to minimise the chance of confusion. RSPs and ASPs should prepare for enquiries from end-users regarding the operation of services using nbn's network in a power outage. Where RSPs or ASPs offer additional capabilities to their customers to ensure their services do continue to operate under power outages, they should advise their customers of those options.

8 REFERENCES

Publication	Title
Industry Codes and Guidelines	
C628:2015	Telecommunications Consumer Protections Code
IGN 004	Industry Guidance Note – Migration of Legacy Services
IGN 008	NBN FTTB/N Migration Processes
Industry Documents	
Telecommunications (Migration Plan Principles) Determination 2015 and the Telecommunications (Migration Plan - Specified Matters) Instrument 2015	
Telstra's Migration Plan, approved by the Australian Competition and Consumer Commission (ACCC) in February 2012	
nbn's Wholesale Broadband Agreement and Special Access Undertaking, which was approved by the ACCC in December 2013	
nbn's Wholesale Broadband Agreement	
Monitored Fire Alarm and Lift Emergency Phone Good Practice Guide (under development)	
Migration Assurance Policy statement and framework (Department of Communications and the Arts).	
Legislation	
The Competition and Consumer Act 2010 (Cth)	
The Privacy Act 1988 (Cth)	
The Telecommunications Act 1997(Cth)	
The Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth)	

PARTICIPANTS

The Working Committee responsible for the revisions made to this Guideline consisted of the following organisations and their representatives:

Organisation	Membership	Representative
Adtran	Voting	Alex Grigoruk
ACMA	Observer	John Griffiths
ACCC	Observer	Ed Seymour
ACCC	Observer	Joshua Davies
Department of Communications and the Arts (DoCA)	Observer	Nikki Vajrabukka
DoCA	Observer	Tennille Callaway
Foxtel	Voting	Melanie Rainey
iiNet	Voting	James Barry
M2 Group	Voting	Chris Kulpa
nbn	Chair	Mike North
nbn	Voting	Alex Vulkanovski
nbn	Non-voting	Chris Slater
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Nokia	Voting	Brent Ryan
Optus	Voting	Anna Gum-Gee
Telstra	Voting	Michael Paton
Telstra	Non-voting	Brian Miller
Telstra	Non-voting	Peter Walsh
Telstra	Non-voting	John Laughlin

This Working Committee was chaired by Mike North. Craig Purdon of Communications Alliance provided project management support. The Department of Communications and the Arts provided secretarial support.

Communications Alliance was formed in 1997 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the *Telecommunications Act 1997* - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.