



Review of the NBN Access Transfer Industry Code (C647:2017)

Telstra is pleased to provide the following comments to Communications Alliance regarding its review of the *Industry Code CA C647:2017 NBN Access Transfer* ("the Code"). The Code is an important instrument facilitating customer choice and making it easy for customers to change their telecommunications supplier. Generally speaking, we believe the Code is meeting the needs of industry and the community. However we are of the view some improvements could be made.

Our main area of concern is with levels of invalid transfers. The impact on customers and losing Service Providers can be significant. Accordingly, we believe the Code should be reviewed with a view to reducing the volume and rate of invalid activity.

- Telstra does not believe there is an incentive for Service Providers to knowingly submit invalid transfers as this results in service disruption for customers, however there needs to be more onus placed on the gaining Service Provider to ensure they identify the correct NBN service before submitting a transfer request. It is equally important that this additional onus does not drive cost onto the losing Service Provider or the industry in general.
- Where a gaining Service Provider has submitted a transfer request and nbn co confirm they have completed the request, consideration needs to be given to place further obligations on the gaining Service Provider to confirm the NBN service is working post transfer and to take timely action where the NBN service is not working.
- Where a transfer has been completed and the losing Service Provider believes the transfer to be invalid, there needs to be improvement in the responsiveness of the gaining Service Provider when validating the Customer Authority of the transfer.
- nbn co needs to play a greater role in ensuring gaining Service Providers are transferring the correct NBN service and not inadvertently submitting an invalid transfer. nbn co was established as the underlying carrier over which Retail Service Providers supply voice and broadband services to consumers. nbn co needs to ensure Service Providers are able to access the necessary information to facilitate NBN Access Transfers of the correct service.

Telstra supports the review of the Industry Code CA C647:2017 NBN Access Transfer as outlined above and looks forward to working with the Communications Alliance and other industry stakeholders to drive proportionate improvements for customers and Service Providers.