

The logo for Optus, consisting of the word "OPTUS" in a bold, teal, sans-serif font.

Submission in response to  
Communications Alliance  
consultation:

**Potential review of  
C647:2017 NBN Access  
Transfer Industry Code**

15 March 2019

Optus welcomes the opportunity to provide comments on the proposed review of the NBN Transfer Code as per the request from Communications Alliance on the 18<sup>th</sup> of February

Optus believes that in most instances the existing NBN Access Transfer process is working very well and provides an efficient way for end users to move their existing NBN based broadband service from one RSP to another RSP without the need to connect an entirely new NBN service. Connecting a new NBN service in parallel to an existing NBN service (rather than using NBN Transfer) can be more expensive for both the end user and the RSP as the transaction may incur new line connection fees, there may also be an overlap of billing between the legacy service and the new service. As an NBN Transfer transaction cancels the legacy service, it allows the full change of supplier process to be completed in a faster timeframe than a parallel install. The process also allows the end customer to re-use the same existing in premises socket for their replacement service.

Optus submits that there are some process improvements and potential updates to the existing code that should be considered by NBN Co and all RSPs who make use of the NBN Transfer Process.

### ***1.1 Visibility of the gaining RSP and the losing RSP in NBN Transfer Transactions when either of these parties is a downstream RSP.***

The current version of the NBN Access Transfer Code does not address NBN Transfers for RSPs who do not have a direct relationship with NBN Co and acquire services from a Wholesaler (Downstream RSPs). NBN provides the EPID of the RSP that it sells the NBN service to in an NBN Transfer Transaction, but often that RSP is wholesaling the service to downstream RSP. This means that an RSP cannot always accurately establish from an enhanced SQ transaction who the current RSP is on an AVC that it wishes to transfer. It also means that when an RSP receives an NBN Transfer Loss Advice Notification it cannot accurately establish who the gaining RSP is when a downstream RSP has initiated the transfer transaction.

In order to improve the NBN Transfer process, Optus suggests that NBN should maintain records of the EPIDs of both direct RSPs and Downstream RSPs against AVCs, and to properly display these EPIDs in Enhanced SQ transactions and NBN Transfer Loss notifications. This would be similar to the industry MNP Transfer process where the EPIDs of downstream MVNO resellers are used in MNP Transfer transactions and are stored in a central database. It would also assist NBN and RSPs in accurately identifying downstream RSP services where required.

The accurate identification of the actual losing RSP and actual gaining RSP in the NBN Transfer process would assist a gaining RSP with the accurate identification of a service to be transferred when there are multiple AVCs at a LOC. It would also improve the visibility and identification of who the gaining RSP is if there is any query from the losing RSP or if an NBN Transfer Reversal is required.

### ***1.2 Introduction of a Same RSP NBN Transfer Process where retail RSPs and downstream RSPs are involved***

Currently if an RSP wants to transfer an NBN Service from its retail base to a downstream RSP (or vice versa) it must disconnect the active AVC/PRI, wait for this to complete, wait for SQ to update to available/inactive, place a new ADD and wait for completion. This takes anything from 1 to 48 hrs to complete, with a potential loss of service during the change.

The most elegant solution would be for NBN to offer a “same RSP transfer” to all RSPs – allowing new AVC/PRI and CTAG and template. Again, this process should use the EPIDs of both the retail RSPs and the relevant downstream RSPs to properly identify transfers between these entities. Such a process would mirror the existing Industry MNP Transfer process which offers a same carrier port between downstream mobile SPs with different EPIDs.

### ***1.3 Preventing Ping Pong Transfers***

NBN has indicated that it has identified some cases where NBN AVCs have transferred several times between RSPs in a short timeframe (referred to as Ping Pong transfers). These types of transactions do not appear to be in the best interest of end users or RSPs. Optus would support and recommend enhancements to the NBN Transfer Code and the process that would allow NBN to intervene to prevent these types of cases from re-occurring or to further investigate cases where this is occurring.

### ***1.4 Ensuring we have a fast and effective Transfer Reversal process when an invalid transfer is identified.***

Optus believes that having accurate EPIDs on NBN services that reflect the downstream RSP as well as the retail RSP would enhance the investigation of any invalid NBN Transfer transactions and the reversal process. Currently the losing RSP does not have visibility on who the RSP is when a downstream RSP is involved, this can delay investigation and rectification of a Transfer issue as they are reliant on contacting a wholesaler to identify the correct RSP. The industry NBN Transfer contact list does not currently include the contact details for most downstream RSPs even though many of these are regularly using the transfer process. It also appears that some RSPs are using the standard NBN Transfer Process rather than a Transfer Reversal to rectify an Invalid Transfer. Proper identification of the gaining and losing parties in these transactions would assist RSPs and NBN in identifying and addressing any cases of Invalid Transfer in a faster timeframe.

The Reversal process could also be enhanced if it could re-instate the same PRI and AVC, this would prevent the need for the losing RSP to rebuild the service and to get an entirely new AVC ID on a reversed service

### ***1.5 Proposals to introduce additional validation in an NBN Transfer transaction***

There have been some initial suggestions on possibilities for enhancing the existing validation process for an NBN Transfer, including the development of RSP to RSP validation and the introduction of new service identifiers or tags. Optus’ initial view on suggestions that RSPs should build new processes (or to print NBN AVC IDs or Copper Pair

IDs on their invoices) is that solutions would be very complex to build, expensive to implement and would require significant redesign from every RSP involved in the Transfer process. If not implemented correctly these proposals could slow down the NBN Access Transfer process and may cause some transfers to be un-necessarily blocked or rejected. In the absence of complex validation, the onus lies with the gaining RSP to ensure that it has taken steps to correctly identify the AVC to be transferred before processing a transaction.

One known issue with copper pairs and validation that is not addressed in the current version of the NBN Transfer Code is when there is more than one active AVC belonging to the same RSP at a single NBN location. In this case there is currently no defined way for the Gaining RSP to check or validate which active AVC they should action the NBN Transfer Transaction on. The image below shows what is currently displayed to the Gaining RSP in the NBN portal when there is more that one active AVC at a LOC ID. If the Transfer Code is going to be amended Optus suggests that a recommended solution be agreed upon to accurately manage transfers in examples like this.

**Copper pairs at this location**

Service Class	UNI-DSL ID	Exchange Pair Status	Last Active Date	FNN3ULL	Service Provider ID	Order Availability
13	CP13000022	Active	-	-	0002	Available
<p><b>Estimated speed</b> Traffic Class 2 Up to 5 Mbps supported</p> <p><b>Estimated speed</b> Traffic Class 4 Downstream 18 Mbps - 45 Mbps Upstream 5 Mbps - 14 Mbps</p> <p><b>Existing service details</b> EPID 0002</p>						
13	CP13000022	Active	-	-	0002	Available
<p><b>Estimated speed</b> Traffic Class 2 Up to 5 Mbps supported</p> <p><b>Estimated speed</b> Traffic Class 4 Downstream 18 Mbps - 45 Mbps Upstream 5 Mbps - 14 Mbps</p> <p><b>Existing service details</b> EPID 0002</p>						
12	CP13000022	Inactive	10/12/2015	-	-	Not available for Service Transfer
<p><b>Estimated speed</b> Traffic Class 2 Up to 10 Mbps supported</p> <p><b>Estimated speed</b> Traffic Class 4 Downstream 20 Mbps - 51 Mbps Upstream 8 Mbps - 23 Mbps</p> <p>Subsequent installation charge will apply as nbn service already exists at this location.</p>						
12	CP13000022	Inactive	-	-	-	Not available for Service Transfer

Note: Estimated speeds may vary

**Service Transfer details**  
 Transfer nbn Service:  Yes  No  
 Transfer Type: Service Transfer  
 Customer Authority Date: 13/03/2019

Having an accurate record of the Retail RSP EPID (either a direct RSP or a Downstream RSP) in such an example would improve the Gaining RSPs ability to validate which AVC to action the NBN Transfer on in this example if the Losing RSPs are different.

Optus does not see any current requirement for introducing processes to block transfers or to introduce new validation steps specifically for Priority Assistance Services, Enhanced SLA Services, elderly or voice only services. Prior to the introduction of the NBN, voice and broadband services with these types of features have successfully transferred between SPs for many years without the need for additional validation steps. The gaining RSP is responsible for obtaining a Transfer Customer Authorisation from the end user and for informing the end what services and features it will offer prior to submitting a transfer.

Some end-users also choose to change the existing features as part of an NBN transfer transaction (for example transferring to a different NBN speed tier or a different SLA option).

Optus is aware that there are ongoing improvements underway to correctly classify vacant copper pairs and active AVCs at FTTN/B multi-customer locations and to match these to unique location IDs (for example the introduction of specific Location ID for non-premises services may further improve this and NBN has also been conducting address cleaning at MDUs and LOC ID updates for some time now). This piece of work appears to be larger than the scope of the NBN Transfer Code, however improvements made in this area may make it easier for a gaining RSP to accurately identify the correct AVC and copper pair to transfer and to reduce the potential for invalid transfers.

### ***1.6 NBN Access Transfer capability for NBN Business Services and NBN Enterprise Ethernet Services***

The volume of active business services on the NBN has significantly grown since the original NBN Access Transfer Code was drafted and there have also been many changes to the business products that NBN offers RSPs. Therefore, if the NBN Transfer code is going to be reviewed, it is an appropriate time for RSPs and NBN to consider if current code properly addresses the requirements for the transfer of NBN Business Services between RSPs or if changes are required. The existing NBN Transfer Code does include an option for a parallel Cross Port Transfer process on FTTP, Satellite and Fixed Wireless that was specifically built with NBN Transfers for business services in mind. A Cross Port NBN Transfer transaction is not available on FTTN, FTTB, FTTC or HFC locations. Optus' experience is that the transfer of complex business products at these locations is completed by ordering a new parallel NBN AVC and then separately disconnecting the legacy service after a cutover and migration to the new service has been successfully completed.

NBN is now applying a business flag to AVC services in its systems that are classified as "NBN Business", and this field is not currently returned in an Enhanced SQ Transaction. Optus believes that this flag may be useful information for RSPs conducting NBN Transfer transactions in the future and this is a possible enhancement the working committee could consider.

NBN has recently launched Enterprise Ethernet Services which are not currently referred to in the existing NBN Transfer code. Customers with this NBN product will want to transfer their NBN based services between RSPs at some stage. NBN has already indicated publicly that once initial agreed fixed terms expire on Enterprise Ethernet, these services should be able to switch between RSPs without disconnecting from the NBN Network. If Enterprise customers do wish to change NBN suppliers in the future and there is no defined NBN EE Transfer process it will be inconvenient for end users, RSPs and NBN as duplicate overlapping services will need to be built. The C647 Working Committee should consider the full requirements for this type of access transfer which would ideally involve a Cross Port transfer on FTTP to support a limited transition overlap period.

Optus recommends that a Communication Alliance Working Committee is formed to consider all the feedback from RSPs and NBN, review options for improving the current NBN Transfer process and for updating the existing code.