
OPERATIONAL EQUIVALENCE REPORT FOR THE DECEMBER 2015 QUARTER

29 FEBRUARY 2016

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1. Executive Summary

This Operational Equivalence Report has been prepared under clause 16.2 of the Structural Separation Undertaking (**SSU**) and sets out the results of Telstra's performance against the Equivalence and Transparency Metrics in Schedule 3 of the SSU for the October to December 2015 Quarter (**the December Quarter**).

In total, we report on performance against 35 Metrics in this document. The first 32 Metrics relate to the operational quality and delivery standard of relevant Regulated Services, being:

- Basic Telephone Service (**BTS**) (Metrics 1-7);
- Wholesale ADSL Layer 2 Service (**ADSL**) (Metrics 8-11);
- Line Sharing Service (**LSS**) (Metrics 12-13);
- Unconditioned Local Loop Service (**ULLS**) (Metrics 14-16); and
- Domestic Transmission Capacity Service (**DTCS**) (Metrics 17-18).

The other three Metrics relate to:

- billing timeliness (Metric 19);
- access to Telstra Exchange Building Facilities (Metric 20); and
- Wholesale systems availability (Metric 21).

Metrics 1-11 and 17-19 compare Telstra's performance in relation to services delivered to Wholesale Customers with its performance in relation to services delivered to Retail Business Units. The remaining Metrics (i.e., Metrics 12-16 and 20-21) are measures of our performance against specified service levels for Telstra's delivery of Wholesale service only.

Metrics 1-12 are reported for Business and Residential End-Customers separately.

Telstra's performance details and the information contained in this Operational Equivalence Report are based on the information available at the date the report is prepared. Telstra reserves the right to provide any correction to this Report, should it later discover an error or other methodological issue with the calculation of the results or the explanations provided.

A positive result in the Metric indicates either:

- a result that is in favour of Telstra's Wholesale Customers; or
- that Telstra has exceeded the specified service target.

A negative result in the Metric indicates either:

- a result that is in favour of Telstra's Retail Business Units; or
- that Telstra has not met the specified service target.

Unless explicitly stated, nothing in this Report is to be taken as any legal admission by Telstra that any of the circumstances described amount to a breach of any obligation under the SSU.

Table 1.1: December Quarter Results

Metric		Applying the Conditions in para 10, Sch 3, SSU		Not applying the Conditions in para 10, Sch 3, SSU	
		Business	Residential	Business	Residential
1.	BTS Activation – In Place	1.46%	1.72%	1.46%	1.72%
2.	BTS Activation – New, no work	-1.23%	3.05%	-2.17%	3.51%
3.	BTS Activation – New, work	-6.79%	-6.46%	-8.83%	-7.74%
4.	BTS Order Appointment	0.79%	1.83%	0.79%	1.83%
5.	BTS Fault Restoration	1.29%	-1.37%	-0.08%	-2.81%
6.	BTS Fault Appointment	-0.64%	0.11%	-0.64%	0.11%
7.	BTS Non-Recurring Faults	0.01%	-0.30%	0.01%	-0.30%
8.	ADSL Services Provisioned	0.26%	-0.86%	0.72%	-0.86%
9.	ADSL Service – Held Orders	-0.93%	2.56%	-1.85%	3.98%
10.	ADSL Service – Faults Rectified	13.74%	5.88%	16.47%	6.98%
11.	ADSL Service Appointment	0.36%	-0.08%	0.36%	-0.08%
12a.	BigPond ADSL L2 & LSS Completed	-0.42%	-1.00%	-1.41%	-2.20%
12b.	LSS Completed	7.11%	7.80%	5.30%	6.04%
13.	LSS Faults Rectified	2.99%		1.95%	
14.	ULLS Individual Cutovers	3.78%		3.54%	
15.	ULLS Appointments	4.54%		4.54%	
16.	ULLS Faults Rectified	2.19%		-3.54%	
17.	DTCS Orders Provisioned	Telstra has not included any conditions in the DTCS result for activation performance		-17.24%	
18.	DTCS Faults Rectified	-3.37%		-3.59%	
19.	Bill Timeliness	1.15%			
20.	Access to Telstra Exchange Building Facilities	100%			
21.	Wholesale System Availability	99.23%			

As can be seen from the performance results in the table above, of the 35 Metrics reported on (which covers Business and Residential being reported separately for 16 metrics) for the December Quarter, 4 Metrics exceeded the Reporting Variance in favour of Retail: Metric 3 Business, Metric 3 Residential, Metric 17 and Metric 18. The remaining 31 Metric results are either in favour of Wholesale Customers or within the tolerance level of the relevant Metric.

A brief explanation for the Reporting Variances can be found in the body of this Report.

2. Introduction

This Operational Equivalence Report sets out the Quarterly results of Telstra's performance against the Equivalence and Transparency Metrics in Schedule 3 of the SSU.

Most of the Metrics are designed to compare Telstra's performance in relation to services delivered to Wholesale Customers with its performance in relation to services delivered to Retail Business Units. The other Metrics measure Telstra's performance in supplying services to Wholesale Customers against specific service levels. To the extent that the results compare favourably, it indicates that the standard of service delivery that Telstra is supplying to Wholesale Customers meets or exceeds the requirements of the SSU.

2.1. The Interim Equivalence and Transparency Measures in the SSU

Under clause 16.2 of the SSU, Telstra is required to prepare, and provide to the ACCC and the Independent Telecommunications Adjudicator (ITA), an Operational Equivalence Report outlining its performance against 35 Equivalence and Transparency Metrics. The Report must be produced Quarterly, for each three month period starting from 1 January, 1 April, 1 July and 1 October each year.

2.2. Purpose of the Operational Equivalence Report

This Operational Equivalence Report is published on the Telstra Wholesale website to provide information to the public, the industry, the ACCC and the ITA about measures of Telstra's performance in meeting the IET requirements in Part D of the SSU.

The URL to the Telstra Wholesale website is <http://www.telstrawholesale.com.au/about/structural-separation-undertaking/index.htm#tab-2>

2.3. Contents of the Operational Equivalence Report

This Operational Equivalence Report contains the following sections:

- **Section 3.1** – sets out the performance standards for each Metric as published in the SSU. Refer to **Tables 3.1.1 to 3.1.8**.
- **Section 3.2** – describes the approach to calculating the results.
- **Section 3.3** – describes the methodology used to calculate the Average Performance Results or Average Cycle Times.
- **Section 3.4** – summarises the results for the December 2015 Quarter (**the December Quarter**) in **Tables 3.4.1, 3.4.2 and 3.4.3**.

In calculating these results, Telstra is entitled to apply certain conditions set out in paragraph 10 of Schedule 3 of the SSU (the **Conditions**). The only Condition that Telstra has applied in the December Quarter relates to Mass Service Disruptions (**MSDs**). Telstra believes that it is reasonable to exclude MSDs from the performance measurements for the relevant Quarter as, by their very nature, MSDs prevent Telstra from provisioning services and rectifying faults, and impact both Wholesale and Retail Customers within the geographic area in which the MSD is applied. As required under clause 16.2(a)(ii) of the SSU, Telstra has also calculated the results

that would have been achieved for each Metric if the Conditions were not applied. **Table 3.4.1** lists the MSDs applicable for the December Quarter.

The Metrics reported in **Table 3.4.2** compare Telstra's performance in relation to services delivered to Wholesale Customers with its performance in relation to services delivered to Retail Business Units. For each of these Metrics, a positive result indicates that Telstra's performance in relation to services delivered to Wholesale Customers exceeds its performance in relation to Retail Business Units. A result of 0 indicates that the performance for Wholesale Customers equals the performance for Retail Business Units. A negative result indicates that the performance for Retail Business Units exceeds the performance for Wholesale Customers.

Table 3.4.3 sets out the Average Performance Results or Average Cycle Times for the supply of the relevant service for Retail and Wholesale Customers.

3. Equivalence and Transparency Measures and Service Levels

3.1. Service Levels

The following table contains the service levels for each Equivalence and Transparency Metric as set out in the SSU.

Table 3.1.1: Basic Telephone Service – Equivalence and Transparency Metrics

Metric	Measure	Service Level [#] (where applicable)
1.	The percentage of Basic Telephone Service customer installation orders provisioned in the relevant Quarter on or by the Service Level – previous service available for automatic connection (i.e. an In-place Connection)	Urban – 2 Clear Working Days Major Rural – 2 Clear Working Days Minor Rural – 2 Clear Working Days Remote – 2 Clear Working Days, each from the relevant order date [^]
2.	The percentage of Basic Telephone Service customer installation orders provisioned in the relevant Quarter on or by the Service Level – new service with available cabling and capacity where pre-provisioning work is not required	Urban – 5 Clear Working Days Major Rural – 10 Clear Working Days Minor Rural – 10 Clear Working Days Remote – 15 Clear Working Days, each from the relevant order date [^]
3.	The percentage of Basic Telephone Service orders provisioned in the relevant Quarter, on or by the Service Level – new service which requires additional cable or network capacity	Urban – 20 Clear Working Days Major Rural – 20 Clear Working Days Minor Rural – 20 Clear Working Days Remote – 20 Clear Working Days, each from the relevant order date [^]
4.	The percentage of Basic Telephone Service order appointments that are met in the relevant Quarter	All locations – appointments between two particular times less than or equal to a 4 hour period – must be at the customer's premises no later than 15 minutes after the end time of the appointment Urban / Major Rural – appointment window between to particular times greater than a 4 hour period but less than or equal to a 5 hour period – must be at the customer's premises no later than the end time of the appointment Minor Rural / Remote – appointment window between two particular times greater than a 4 hour period but less than or equal to a 5 hour period and the technician is required to travel a long distance – must be at the customer's premises no later than 45 minutes after the end time of the appointment

Metric	Measure	Service Level [#] (where applicable)
		Note – Response time is the end time of the calculation. It represents the time that the technician arrived for the appointment and is dependent on Telstra workforce or contractors making a record of their arrival time
5.	The percentage of Basic Telephone Service Faults that are rectified in the relevant Quarter, and copied to Telstra's data warehouse by the relevant data extraction date, on or by the Service Level	Urban – 1 Clear Working Day after the Fault report is logged by Telstra [^] Major Rural / Minor Rural – 2 Clear Working Days after the Fault report is logged by Telstra [^] Remote – 3 Clear Working Days after the Fault report is logged by Telstra [^]
6.	The percentage of Basic Telephone Service Fault appointments that are met in the relevant Quarter	All locations – appointments between two particular times less than or equal to a 4 hour period – must be at the customer's premises no later than 15 minutes after the end time of the appointment Urban / Major Rural – appointment window between two particular times greater than a 4 hour period but less than or equal to a 5 hour period – must be at the customer's premises no later than the end time of the appointment Minor Rural / Remote - appointment between two particular times greater than a 4 hour period but less than or equal to a 5 hour period and the technician is required to travel a long distance - must be at the customer's premises no later than 45 minutes after the end time of the appointment Note – Response time is the end time of the calculation. It represents the time that the technician arrived for the appointment and is dependent on Telstra workforce or contractors making a record of their arrival time
7.	The percentage difference in non-recurring Fault ratio	Percentage of basic telephone service Faults that are not re-reported within 60 calendar days

Interim Orders and Withdrawn Orders are excluded.

^ Measured from the date which Telstra receives a correct and valid application from the customer to the date recorded in Telstra's relevant provisioning system as the date when all of the relevant stages for that service through which an order can pass are completed or the clearance date if there was a Fault on the connected service.

* Where CRD or RCRD is longer than the Service Level, then the CRD or RCRD will be the Service Level (or Telstra commitment date).

+ Metric does not apply where a site visit to the customer's premises is required to determine whether a Fault is the cause of the service difficulty.

Table 3.1.2: Wholesale ADSL Layer 2 Service – Equivalence and Transparency Metrics

Metric	Measure	Service Level (where applicable)
8.	The percentage of services provisioned within Service Level – where the customer or end-user has an existing and functioning basic telephone service capable of supporting ADSL services	3 Clear Working Days from date entered into Telstra's provisioning system [#]
9.	The percentage of services provisioned within Service Level – held orders	20 Clear Working Days from date entered into Telstra's provisioning system [#]
10.	The percentage of Faults rectified within Service Level	Urban – by the end of the first Clear Working Day after the Fault report is logged by Telstra [^] Major Rural and Minor Rural – by the end of 2 Clear Working Days after the Fault report is logged by Telstra [^] Remote – by the end of 3 Clear Working Days after the Fault report is logged by Telstra [^]

Metric	Measure	Service Level (where applicable)
11.	The percentage of appointments kept	<p>Appointment between two particular times less than or equal to a 4 hour period - must be at the customer's premises no later than 15 minutes after the end time of the appointment</p> <p>Appointment window between two particular times greater than a 4 hour period but less than or equal to a 5 hour period - must be at the customer's premises no later than the end time of the appointment</p> <p>Appointment window between two particular times greater than a 4 hour period but less than or equal to a 5 hour period and the technician is required to travel a long distance - must be at the customer's premises no later than 45 minutes after the end time of the appointment</p> <p>Note – Response time is the end time of the calculation. It represents the time that the technician arrived for the appointment and is dependent on Telstra workforce and contractors making a record of their arrival time</p>

Where CRD or RCRD is longer than the Service Level, then the CRD or RCRD will be the Service Level (or Telstra commitment date).

^ Measured from the date the Fault call is received to the earlier of:
 (A) the date and time that the tester enters an actual restore against the order; or
 (B) the date and time the field technician enters as the restore time.

* Metric does not apply where a site visit to the customer's premises is required to determine whether a Fault is the cause of the service difficulty.

Table 3.1.3: Line Sharing Service – Equivalence and Transparency Metrics

Metric	Measure	Service Level (where applicable)
12(a)	The percentage of BigPond ADSL L2 and LSS completed within Service Level	3 Clear Working Days ^{#^*}
12(b)	The percentage of LSS completed within Service Level	3 Clear Working Days ^{#^*}
13.	The percentage of Faults rectified within Service Level	<p>Urban – By the end of the first Clear Work after the Fault report is logged by Telstra^{+>}</p> <p>Major Rural / Minor Rural – by the end of 2 Clear Working Days after the Fault report is logged by Telstra^{+>}</p> <p>Remote – By the end of 3 Clear Working Days after the Fault report is logged by Telstra^{+>}</p>

Where the CRD or RCRD is longer than the Service Level, then the CRD or RCRD will be the Service Level (or Telstra commitment Date).

^ Measured from the date Telstra enters the order into the relevant provisioning system to the last date recorded against the following states (where applicable) through which can order can pass:

- (A) Plant assignment;
- (B) Exchange building activation.

* Does not apply where any field work or exchange work required to fulfil the activation is not part of a standard LSS activation order.

+ Measured from the date and time the Fault call was logged by Telstra (in Telstra's information technology systems) to the date and time the technician records that the Fault is repaired. If the call date and time is after 5pm, the baseline for calculating the Service Level moves to 9am the next Working Day.

> Does not apply where a site visit to the customer's premises is required to determine whether a Fault is the cause of the service difficulty.

Table 3.1.4: Unconditioned Local Loop Service - Equivalence and Transparency Metric

Metric	Measure	Service Level (where applicable)
14.	The percentage of ULL Individual Cutovers completed on the CRD	95% ^{#^}
15.	The percentage of appointments for ULL Individual Cutovers offered according to the Service Level – where there is an Intact metallic path at the relevant premises	For Band 1 and 2 exchanges only, if the Wholesale Customer requests, Telstra will offer an appointment that occurs 3 Clear Working Days after the date the request for the ULL Individual cutover is received. If the CRD is greater than 3 Clear Working Days, that date becomes the applicable Service Level [^]
16.	The percentage of Faults rectified within the Service Level	Band 1 and 2 – by the end of the first Clear Working Day after the Fault report is logged by Telstra ⁺ Band 3 – by the end of 2 Clear Working Days after the Fault report is logged by Telstra ⁺ Band 4 – by the end of 3 Clear Working Days after the Fault report is logged by Telstra ⁺

Metric does not apply where any field work or exchange work required to fulfil the activation is not part of a standard ULLS activation order.

[^] Measured based on the CRD recorded in the relevant Telstra systems.

^{*} Measured from the date and time the Fault call was logged by Telstra (in Telstra's information technology systems) to the date and time the technician reports that the Fault is repaired. If the call date and time is after 5pm, the baseline for calculating the Service Level moves to 9am the next Working Day.

⁺ Metric does not apply where a site visit to the customer's premises is required to determine whether a Fault is the cause of the service difficulty.

Table 3.1.5: Domestic Transmission Capacity Service - Equivalence and Transparency Metrics

Metric	Measure	Service Level (where applicable)
17.	The percentage of Domestic Transmission Capacity Service orders provisioned on or by the Service Level	Category 1 Order: Metro – 9 Clear Working Days ^{#^} Country – 19 Clear Working Days ^{#^} Category 2 Order: Metro – 19 Clear Working Days ^{#^} Country – 39 Clear Working Days ^{#^} Category 3 Order: Metro only – 24 Clear Working Days ^{#^}
18.	The percentage of Faults rectified within Service Level	Urban ⁺ – 1 Clear Working Day Rural ⁺ – 2 Clear Working Days Remote ⁺ – 3 Clear Working Days; of the Fault report being logged by Telstra [*]

Measured from the date that Telstra received a correct and valid application from the customer to the date recorded in Telstra's IT systems that identifies the date when all of the relevant stages through which the order can pass are completed.

[^] Where the CRD or RCRD is longer than the Service Level, then the CRD or RCRD will be the Service Level (or Telstra commitment date).

^{*} Measured from the 'call date and time' which is the date and time the Fault call is logged by Telstra (in Telstra's IT Systems) to the earlier of:

- (A) the date and time that the tester enters an actual restore against the order; or
- (B) the date and time the field technician enters as the restore time.

If the call date and time is after 5pm, the baseline for calculating the Service Level moves to 9am the next Working Day.

⁺ Refers to the location of the Fault, and not the location of the terminating points of the service.

Table 3.1.6: Billing Timeliness - Equivalence and Transparency Metric

Metric	Measure	Service Level (where applicable)
19.	Billing Timeliness – Current charges generated in Telstra's system presented on bill	Wholesale charges – not older than 95 days Retail charges – not older than 190 days

Table 3.1.7: Access to Telstra Exchange Building Facilities - Equivalence and Transparency Metrics

Metric	Measure	Service Level (where applicable)
20.	The percentage of JCI's completed on the TCD	90%

Table 3.1.8: Wholesale systems availability - Equivalence and Transparency Metrics

Metric	Measure	Service Level (where applicable)
21.	Availability of LOLO	98%

Further information in relation to the metrics, including relevant definitions, is provided in the SSU.

A copy of the SSU is available at <http://www.telstrawholesale.com.au/download/document/ssu.pdf>

3.2. Approach to Calculating Results

Paragraph 10 of Schedule 3 of the SSU provides that, when calculating its performance in relation to each Metric, Telstra is not required to take into account:

- for Metrics 1-16 and 20-21, a ticket of work which is directly affected by NBN-related activities being undertaken by NBN Co or Telstra in any Rollout Region or which is in the course of being migrated to the NBN at any time during the Quarter;
- a failure to meet a Service Level which is caused by activities undertaken by Telstra in order to comply with the Migration Plan;
- a failure to meet a Service Level due to circumstances outside of Telstra's control;
- a failure to meet a Service Level due to the need for Telstra to redeploy staff or equipment from one or more areas to another area that has been affected by circumstances outside of Telstra's control, such as an area that has been affected by a natural disaster;
- circumstances where the Retail Customer or end-user of a Wholesale Customer causes delay or fails to keep an appointment with Telstra without giving at least 24 hours notice;

- a failure to meet a Service Level which the Retail Customer or Wholesale Customer has waived in writing; or
- any temporary planned outage or withdrawal of services necessary in order to maintain or upgrade a facility, service or network, where Telstra has given reasonable notice to the Retail Customer or Wholesale Customer of the outage or withdrawal.

For the December Quarter the only Condition that Telstra has applied relates to MSDs.

3.3. Methodology Used to Calculate Average Performance Results (Average Cycle) Times

The average cycle time has been calculated to determine the average time taken by Telstra to complete the relevant task requested, where the Wholesale or Retail Customer requests the task to be undertaken by the standard provisioning time for that particular task. Accordingly, Telstra has adjusted the data used to calculate average cycle times by excluding Customer requests that are outside the standard provisioning time for that task. Telstra considers this gives a more accurate reading of Telstra's performance in completing tasks for customers, since it removes any distortion of the measure of performance for either Wholesale or Retail Customers caused by those customer requests for a longer-than-standard timeframe for completion. (Telstra's performance on those tasks is still recorded in the Metrics themselves, as such those metrics still capture whether or not Telstra met the timeframe based on the actual date requested by the Customer.)

Telstra's approach in calculating average cycle times is set out below.

Activation

Definition of Working Day:

- Monday to Friday 8 am to 5 pm (except for Metric 17).
- Metric 17 measures Clear Working Days – a Working Day commencing on 8 am on the next or preceding Working Day.
- Excluding public holidays (except for Metric 17).
- Public holidays are included in the measurement of Metric 17 on the basis that two exchanges are involved therefore if there is a public holiday where one exchange is located, work could progress in the other exchange. A variation for national public holidays has not been included due to the complexity of the calculation.
- Excluding days where a MSD or Local Service Disruption (LSD) has been granted for the service (except for Metric 1 and 17).
- MSDs/LSDs are not factored into the measurement of Metric 17 as two exchanges are involved and both may not be impacted by the MSD/LSD.

Rules:

- Metrics 1, 2, 3, 4, and 17 measure the average number of Working Days taken to complete the relevant task between the Application Date and Time and the Completion Date and Time.
- Metrics 8 and 9 measure the average number of Working Days taken to complete the relevant task between the Create Date and Time (i.e. the date/time when the task is entered on Telstra's provisioning system) and the Completion Date and Time.
- If the Application/Create Date and Time is on a Working Day (as defined above) then that is Day 0, the next Working Day of the life of the order would be day 1 and so on.
- If the Application/Create Date and Time is not on a Working Day, then the next Working Day following that Date is counted as Day 0.

- If the order is completed on the same day as the Application/Create Date and this is not on a Working Day (e.g. due to weekends, public Holidays, MSD/LSD), then the Cycle Time is 0.
- If the CRD or Revised Customer Required Date (RCRD) is greater than Standard Provisioning Time (SPT) then the Connection is not counted in the Cycle Time calculation.
- If the Completion Time is invalid or Null then the Connection is not counted in the Cycle Time calculation. This occurs in the rare event that no actual restoration date is logged onto the system. It prevents data errors being returned by the system.
- The provision of an interim service is taken into consideration in determining the measurement.

Assurance

Definition of Working Day:

- Monday to Friday 8 am to 5 pm
- Excluding public holidays where the service is located
- Excluding days where a MSD or LSD has been granted for the service

Rules:

- The measurement is calculated as the average number of days taken to rectify the fault by measuring the number of Working Days between the Call Date/Time or the date/time when we receive it on our systems and the Restore Date.
- If Call Date/Time is on a Working Day (as defined above) then that is Day 0, the next Working Day of the life of the fault would be day 1 and so on.
- If Call Date/Time or the date/time when we receive it on our systems is outside a Working Day, then the next Working Day is Day 0.
- If the order is completed on the same day as the Application/Create Date and this is not on a Working Day (e.g. due to weekends, public Holidays, MSDs/LSDs), then the Cycle Time is 0.
- The provision of an interim service is taken into consideration in the measurement.

3.4. Results for the December Quarter

Under the reporting framework in the SSU, Telstra is required to prepare and provide to the ACCC and ITA an Operational Equivalence Report setting out the results for each Metric in the SSU.

Although there is no requirement to provide Reporting Variance explanations in the public report, Telstra will provide a summary explanation in instances where Retail performance exceeded Wholesale performance by more than the 2% tolerance limit (for comparative Metrics) or where the Wholesale performance has not met the specified performance targets by more than 2% for those Metrics which are not calculated in reference to the Retail performance. Additional detail will be provided in the separate, confidential report prepared for the ACCC and the ITA under clause 16.3 of the SSU.

Note: The measurement of Telstra's performance and whether the Reporting Variance explanations are required is determined by considering the performance results with the Conditions applied, in accordance with clause 16.2(d).

The tables in this section set out the results for the December Quarter. A positive outcome means Telstra's performance for Wholesale Customers was greater than its performance for Retail Customers, or that the specified service level was exceeded.

Two sets of results have been provided in the tables below. With the first set of results Telstra has applied the Conditions. With the second set of results Telstra has not applied the Conditions. The

second set of results are provided for informational purposes only, since Telstra is entitled to apply the Conditions in determining the Metric outcomes.

With the first set of results, the only Condition that Telstra has applied relates to MSDs. Telstra excluded from the calculation the areas where a MSD applied. Each MSD used in the calculation met the requirements of the Australian Communications & Media Authority (ACMA). There are stringent guidelines under which a MSD is approved as an exemption to the Customer Service Guarantee. The exemption process is explained in sections 22-27 of the Telecommunications (Customer Service Guarantee) Standard 2011, which can be found on the Australian Government ComLaw website http://www.comlaw.gov.au/Details/F2011C00791/Html/Text#_Toc304293187

Incident weather in the December Quarter resulted in a significant number of MSDs being declared. Details on MSDs that are relevant to the December Quarter are provided in the table below. This information has been extracted from the public notices available on Telstra's internet site at <http://www.telstra.com.au/abouttelstra/commitments/mass-service-disruption/>

Table 3.4.1: December Quarter MSDs

Code	Start	End	Location	Disruption	Estimated Impact
20151218-NSW-E-C-P-HUNTER-AND-CENTRAL-TABLELANDS	18/12/2015	07/01/2016	Hunter District and parts of the Central Tablelands and Mid North Coast of New South Wales	Extreme Weather Conditions	Approximately 7,150 services
20151218-NSW-E-C-P-METROPOLITAN-SYDNEY-AND-ILLAWARRA-DISTRICT	18/12/2015	07/01/2016	Metropolitan Sydney, Illawarra District and parts of the South Coast District of New South Wales	Extreme Weather Conditions	Approximately 9,000 services
20151217-SA-S-F-P-ADELAIDE-AND-REGIONAL-SA	17/12/2015	31/12/2015	Adelaide, Mount Lofty Ranges, Lower Eyre Peninsula, Eastern Eyre Peninsula, Flinders, Yorke Peninsula, Riverlands Districts and parts of the West Coast, North East Pastoral, Murraylands Districts of SA	Other Legal or Regulatory Reason	Approximately 2,000 services
20151201-QLD-E-C-P-BRISBANE-NTH-AND-WIDE-BAY-AND-BURNETT-EXTENSION	01/12/2015	24/01/2016	Part of the Wide Bay and Burnett District of Queensland	Extreme Weather Conditions	Approximately 100 services
20151201-QLD-E-C-P-BRISBANE-NTH-AND-WIDE-BAY-AND-BURNETT	01/12/2015	10/01/2016	Southeast Coast District and part of the Wide Bay and Burnett District of Queensland	Extreme Weather Conditions	Approximately 4,000 services
20151201-QLD-E-C-P-SOUTHEAST-QLD-AND-NORTHERN-RIVERS-NSW	01/12/2015	10/01/2016	Southeast Coast District and part of the Darling Downs and Granite Belt District of Queensland and part of the Northern Rivers District of New South Wales	Extreme Weather Conditions	Approximately 5,850 services
20151201-NSW-E-C-P-SOUTHEAST-QLD-AND-NORTHERN-RIVERS-NSW-EXTENSION	01/12/2015	24/01/2016	Parts of the Northern Rivers District of NSW	Extreme Weather Conditions	Approximately 1,700 services
20151201-SA-S-B-P-MID-NORTH-DISTRICT-BUSHFIRE	01/12/2015	13/12/2015	Parts of the Mid North District of South Australia	Natural Disaster	Approximately 200 services
20151118-WA-S-C-P-SOUTHERN-WA-EXTENSION	18/11/2015	20/12/2015	Parts of the Central Wheat Belt and Great Southern Districts of Western Australia	Extreme Weather Conditions	Approximately 150 services
20151118-WA-S-C-P-SOUTHERN-WA	18/11/2015	06/12/2015	Parts of the Lower West, South West, Central Wheat Belt, Great Southern and South Coastal Districts of Western Australia	Extreme Weather Conditions	Approximately 500 services
20151117-QLD-E-C-P-WIDE-BAY-BURNETT-AND-CAPRICORNIA-EXTENSION	17/11/2015	20/12/2015	Wide Bay and Burnett and Capricornia Districts of Queensland	Extreme Weather Conditions	Approximately 100 services

Code	Start	End	Location	Disruption	Estimated Impact
20151117-QLD-E-C-P-WIDE-BAY-BURNETT-AND-CAPRICORNIA	17/11/2015	06/12/2015	Parts of Wide Bay and Burnett and Capricornia Districts of Queensland	Extreme Weather Conditions	Approximately 450 services
20151116-NSW-E-C-P-CENTRAL-WEST-SLOPES-AND-PLAINS	16/11/2015	06/12/2015	Central West Slopes and Plains District and parts of the Central Tablelands District of New South Wales	Extreme Weather Conditions	Approximately 550 services
20151109-NSW-E-C-P-METROPOLITAN-SYDNEY	09/11/2015	06/12/2015	Sydney Metropolitan District of New South Wales	Extreme Weather Conditions	Approximately 8,900 services
20151109-NSW-E-C-P-PORT-MACQUARIE-AND-SURROUNDING-AREA	09/11/2015	29/11/2015	Parts of the Mid North Coast of New South Wales	Extreme Weather Conditions	Approximately 500 services
20151109-QLD-E-C-P-SOUTHEAST-QLD-AND-NORTHERN-RIVERS-NSW	09/11/2015	01/12/2015	Southeast Coast District and parts of the Darling Downs and Granite Belt, and Wide Bay and Burnett Districts of Queensland and parts of the Northern Rivers District of New South Wales	Extreme Weather Conditions	Approximately 9,000 services
20151109-NSW-E-C-P-METROPOLITAN-SYDNEY-EXTENSION	09/11/2015	20/12/2015	Sydney Metropolitan District of New South Wales	Extreme Weather Conditions	Approximately 2,100 services
20151106-NSW-E-C-P-NORTHEAST-NSW-AND-QLD-GRANITE-BELT	06/11/2015	29/11/2015	Parts of the Northern Rivers, Northern Tablelands and North West Slopes and Plains Districts of New South Wales and part of the Darling Downs and Granite Belt District of Queensland	Extreme Weather Conditions	Approximately 1,400 services
20151106-NSW-E-C-P-NORTHEAST-NSW-AND-QLD-GRANITE-BELT-EXTENSION	06/11/2015	20/12/2015	Parts of the Northern Rivers, Northern Tablelands and North West Slopes and Plains Districts of New South Wales and part of the Darling Downs and Granite Belt District of Queensland	Extreme Weather Conditions	Approximately 550 services
20151106-VIC-S-C-P-MELBOURNE-AND-SURROUNDING-DISTRICT	06/11/2015	06/12/2015	Metropolitan Melbourne and part of the Central District of Victoria	Extreme Weather Conditions	Approximately 12,250 services
20151106-VIC-S-C-P-SOUTHWEST-AND-WIMMERA-DISTRICTS	06/11/2015	29/11/2015	Parts of the South West, Wimmera and North Central Districts of Victoria	Extreme Weather Conditions	Approximately 450 services
20151106-NSW-E-C-P-NORTHEAST-NSW-AND-QLD-GRANITE-BELT-EXTENSION-2	06/11/2015	17/01/2016	Parts of the Northern Rivers, Northern Tablelands and North West Slopes and Plains Districts of New South Wales and part of the Darling Downs and Granite Belt District of Queensland	Extreme Weather Conditions	Approximately 450 services
20151105-NSW-E-C-P-CENTRAL-TABLELANDS-AND-HUNTER-EXTENSION	05/11/2015	18/12/2015	Hunter and parts of the Mid North Coast and Central Tablelands of New South Wales	Extreme Weather Conditions	Approximately 8,550 services
20151105-SA-S-C-P-REGIONAL-SA	05/11/2015	29/11/2015	Lower Eyre Peninsula, Eastern Eyre Peninsula, North East Pastoral, Flinders, Riverland, Murraylands, Mid North, Yorke Peninsula and parts of the West Coast and North West Pastoral Districts of SA	Extreme Weather Conditions	Approximately 1,000 services
20151105-NSW-E-C-P-CENTRAL-TABLELANDS-AND-HUNTER	05/11/2015	29/11/2015	North Coast and Central Tablelands of New South Wales	Extreme Weather Conditions	Approximately 6,350 services
20151102-VIC-S-C-P-NORTHERN-VICTORIA-AND-SOUTHERN-NSW	02/11/2015	29/11/2015	Parts of the Central, North Central, Mallee, Northern Country and North East Districts of Victoria and parts of the Lower Western, Riverina and South West Slopes Districts of NSW	Extreme Weather Conditions	Approximately 2,900 services
20151028-QLD-E-C-P-SOUTHEAST-QLD	28/10/2015	09/11/2015	Parts of the Southeast Coast District of Queensland	Extreme Weather Conditions	Approximately 850 services

Code	Start	End	Location	Disruption	Estimated Impact
20150825-NSW-E-C-P-CENTRAL-WEST-SLOPES-TABLELANDS-AND-HUNTER-EXTENSION-2	25/08/2015	05/11/2015	Hunter District and parts of the Central Tablelands District of NSW	Extreme Weather Conditions	Approximately 1,750 services
20150825-NSW-E-C-P-CENTRAL-WEST-SLOPES-TABLELANDS-AND-HUNTER-EXTENSION-2	25/08/2015	08/11/2015	Hunter District and parts of the Central Tablelands District of NSW	Extreme Weather Conditions	Approximately 1,750 services

Table 3.4.2: December Quarter Results

Metric		Applying the Conditions in para 10, Sch 3, SSU		Not applying the Conditions in para 10, Sch 3, SSU	
		Business	Residential	Business	Residential
1.	BTS Activation – In Place	1.46%	1.72%	1.46%	1.72%
2.	BTS Activation – New, no work	-1.23%	3.05%	-2.17%	3.51%
3.	BTS Activation – New, work	-6.79%	-6.46%	-8.83%	-7.74%
4.	BTS Order Appointment	0.79%	1.83%	0.79%	1.83%
5.	BTS Fault Restoration	1.29%	-1.37%	-0.08%	-2.81%
6.	BTS Fault Appointment	-0.64%	0.11%	-0.64%	0.11%
7.	BTS Non-Recurring Faults	0.01%	-0.30%	0.01%	-0.30%
8.	ADSL Services Provisioned	0.26%	-0.86%	0.72%	-0.86%
9.	ADSL Service – Held Orders	-0.93%	2.56%	-1.85%	3.98%
10.	ADSL Service – Faults Rectified	13.74%	5.88%	16.47%	6.98%
11.	ADSL Service Appointment	0.36%	-0.08%	0.36%	-0.08%
12a.	BigPond ADSL L2 & LSS Completed	-0.42%	-1.00%	-1.41%	-2.20%
12b.	LSS Completed	7.11%	7.80%	5.30%	6.04%
13.	LSS Faults Rectified	2.99%		1.95%	
14.	ULLS Individual Cutovers	3.78%		3.54%	
15.	ULLS Appointments	4.54%		4.54%	
16.	ULLS Faults Rectified	2.19%		-3.54%	
17.	DTCS Orders Provisioned	Telstra has not included any conditions in the DTCS result for activation performance		-17.24%	
18.	DTCS Faults Rectified	-3.37%		-3.59%	
19.	Bill Timeliness	1.15%			
20.	Access to Telstra Exchange Building Facilities	100%			
21.	Wholesale System Availability	99.23%			

As can be seen from the performance results in the table above, of the 35 Metrics reported on (which covers Business and Residential being reported separately for 16 metrics) for the December Quarter, 4 Metrics exceeded the Reporting Variance in favour of Retail: Metric 3 Business, Metric 3 Residential,

Metric 17 and Metric 18. The remaining 31 Metric results are either in favour of Wholesale Customers or within the tolerance level of the relevant Metric.

A brief explanation for the Reporting Variance for the four Metrics is set out below.

Metric 3 Business and Residential (BTS Activation – new services requiring additional cable or network capacity):

The Wholesale tickets missing were a result of infrastructure build delays, delays caused by developer and lead-in delays. Retail also experienced similar issues with a number of their orders. However, Wholesale represents just 10.55% (Business) and 18.38% (Residential) of the total volume of tickets for this category. Because of this, the impact of the volume differential between the number of orders received for Wholesale and Retail is proportionally greater on Wholesale, causing a greater impact upon Wholesale's overall performance level, and therefore volatility in the performance result for these Metrics.

Some of these matters may relate to the Conditions set out in Schedule 3, paragraph 10 of the SSU however Telstra has not excluded these orders from the Metric calculation.

Metric 17 (DCTS Orders Provisioned): This result is primarily driven by the significant volume differential between the number of orders received for Wholesale and Retail for the provisioning of DTCS. The exceptionally low Retail volume creates considerable volatility and renders this Metric/result statistically invalid.

Wholesale's tickets of work missed their target due to factors including faulty equipment; material, infrastructure and construction delays; and resource availability.

Some of these matters may relate to the Conditions set out in Schedule 3, paragraph 10 of the SSU however Telstra has not excluded these orders from the Metric calculation.

Metric 18 (DCTS Fault Rectification): As with DTCS Provisioning, this metric is also driven by the significant difference between the number of faults received for Wholesale and Retail which makes the result volatile.

Wholesale's tickets of work missed their target due to factors including resource availability and the complexity of the fault restoration.

Some of the matters that contributed to the results for both DTCS provisioning and fault rectification may relate to the Conditions set out in Schedule 3, paragraph 10 of the SSU however Telstra has not excluded these orders from the Metric calculation.

Table 3.4.3: December Quarter Results for Metrics for the Average Performance Results (Average Cycle Times In Days)

Metric		Business		Residential	
		Retail	Wholesale	Retail	Wholesale
1.	BTS Activation – In Place	0.54	0.89	1.70	1.50
2.	BTS Activation – New, no work	4.35	4.20	4.27	3.30
3.	BTS Activation – New, work	22.74	24.31	14.27	18.71
4.	BTS Order Appointment	6.29	5.62	6.00	5.52
5.	BTS Fault Restoration	1.02	1.26	0.73	1.20
6.	BTS Fault Appointment	1.21	2.06	1.09	2.27
8.	ADSL Services Provisioned	0.65	1.19	1.27	1.45
9.	ADSL Service – Held Orders	5.00	4.77	6.19	5.34
10.	ADSL Service – Faults Rectified	1.95	1.35	1.76	1.49
11.	ADSL Service Appointment	2.96	2.52	2.50	2.71
17.	DTCS Orders Provisioned	10.00	15.64	N/A	
18.	DTCS Faults Rectified	0.21	0.44	N/A	

Glossary and Acronyms

ACCC	Australian Competition and Consumer Commission
ADSL	Asynchronous Digital Subscriber Line
CRD	Customer Required Date
IET	Interim Equivalence and Transparency
IT	Information Technology
LOLO	LinxOnline Ordering
LSS	Line Sharing Service
NBN	National Broadband Network
RCRD	Revised Customer Required Date
SSU	Structural Separation Undertaking
ULLS	Unconditional Local Loop Service