

Commercial in confidence

Service Withdrawal Notification Explanatory Document

Version 4 - April 2015

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1 Introduction

We have been engaging with you regularly to explain how the NBN Fibre Network Migration process will impact you as a wholesale customer under the fibre-to-the-premises (**FTTP**) rollout of the NBN.

This document provides more detail about the final step on the Telstra side of the Migration process: the termination and cease sale of services over the fixed line networks Telstra is required to disconnect under the Migration Plan and the Definitive Agreements (collectively Telstra's **Disconnection Commitments**) as part of the rollout of the NBN. Telstra is required to treat retail and wholesale services on an equivalent basis under its Disconnection Commitments.

As you know, the Federal Government has elected to continue the rollout of the NBN (previously a FTTP-only rollout) using a multi-technology mix rollout (a combination of FTTP, fibre-to-the-node (**FTTN**), fibre-to-the-basement (**FTTB**), HFC, satellite and fixed wireless technologies) (**MTM Rollout**). On 14 December 2014, Telstra, NBN Co and the Commonwealth announced that agreement had been reached on the terms governing the MTM Rollout. We will be updating this document more fully in the future to reflect those new arrangements.

In anticipation of NBN Co's commercial rollout of service offerings using FTTN technology (**FTTN Rollout**), and NBN Co's commercial rollout of FTTB technology to Multi Dwelling Units (**MDUs**) (**FTTB Rollout**), we have included information in this document about the migration and disconnection process for the FTTB Rollout and FTTN Rollout.

The NBN brings with it a new set of defined terms. These terms are key to understanding the processes of disconnecting from the Telstra network and migrating to the NBN Network. With that in mind, we have developed a glossary of NBN –related terms which is available on our website Telstrawholesale.com and on our Customer Portal. This document uses terms which are further explained in that glossary.

2 Telstra's Disconnection Commitments

What networks are affected?

Our Disconnection Commitments cover the disconnection of most of Telstra's fixed line network infrastructure within the [NBN Fibre Footprint](#):

- the Migration Plan requires disconnection of Telstra's Copper Network and HFC Network; and
- the Definitive Agreements require, in addition, disconnection of much of Telstra's fibre network (essentially our GPON networks),

Collectively, we have defined the fixed networks we are required to disconnect as **Separating Networks**.

Changes to the Migration Plan to accommodate NBN Co's MTM rollout, including FTTB, FTTN and other technologies have been submitted to the ACCC for consideration. However, in essence, Telstra's commitment to disconnect legacy copper services as NBN Co's network is rolled out will stay the same, regardless of the technology type.

What services are affected?

Telstra is required to disconnect all services on its Separating Networks. Most services provided over Telstra's Separating Networks at Premises within the [NBN Fibre Footprint](#) will be disconnected at the Disconnection Date within each of the Rollout Regions specified by NBN Co.

However, the [NBN Fibre Network](#) initially will not be able to support substitutes for some more complex services offered over the Telstra Separating Networks (**Direct Special Services**). These Direct Special Services are categorised into Special Services Classes (**SS Classes**) (see www.telstrawholesale.com.au/exemptions for the details of SS Classes and the services in each class). Direct Special Services will have a temporary 'immunity' from the disconnection requirements in Rollout Regions until the Disconnection Date for their SS Class (which will be announced in the future, in accordance with the processes discussed below).

In recognition that wholesale customers can compete against Telstra by building their own version of Direct Special Services, each SS Class also includes ULLS which are used to supply services which are Service Equivalent to any of those Direct Special Services (**Special Service Inputs**). ULLS used as Special Service Inputs also have temporary 'immunity' from disconnection¹. It will be up to each wholesale customer to assess which of their own services supplied over ULLS are Service Equivalent to the Telstra Direct Special Services in each SS Class and then to notify Telstra using the TSS Codes and certification process set out in the amended ULLS Ordering and Provisioning Manual. We notified you of this process in deployments #3008, #3022, #3040 and #3046. Telstra expects the TSS Code advised by wholesale customers to match ULLS Deployment Class for the relevant service.

There are two processes for withdrawal of an SS Class:

- 1) following NBN Co publishing a White Paper announcing that the [NBN Fibre Network](#) will now support substitute services to the SS Class; and
- 2) withdrawal through Telstra's standard Business as Usual (BAU) process.

We discuss both in section 6 below.

What about our residual fixed network?

Once the [NBN Fibre Network rollout](#) is completed, Telstra will be left with limited fixed local access network infrastructure:

- we are permitted to retain some fibre network (essentially point to point) within the NBN Fibre Footprint; and
- we are required to continue to operate our current Copper Network outside the NBN Fibre Footprint.

Collectively, we have defined these residual fixed networks as **Exempt Networks**.

We will continue to provide services, including declared services, over Exempt Networks in accordance with our regulatory and contractual obligations. Services may be withdrawn from an Exempt Network in accordance with our standard service withdrawal processes.

3 Implementation of our Disconnection Commitments through service withdrawal

The process of disconnecting Telstra fixed networks to comply with our Disconnection Commitments involves a progressive withdrawal of services supplied by Telstra to itself and its wholesale customers as the NBN is rolled out.

The process for withdrawing services on the Telstra network is a process with which you should already be familiar. The difference between this and previous service withdrawals is that the service withdrawal required by the NBN deployment is on an unprecedented scale and is more complex given the range of Telstra retail and wholesale services involved.

Under our commercial agreements with wholesale customers, Telstra has the right to give notice withdrawing and terminating services supplied under those agreements, including where Telstra ceases to provide a declared service to itself.

In order that we can meet our Disconnection Commitments, we will be relying on these contractual provisions to issue service withdrawal notices to affected wholesale customers. Withdrawal of services on our Separating

¹ Note that the Migration Plan also includes SSS in the definition of Special Service Inputs. However, as SSS requires an underlying PSTN service, and Telstra is required to disconnect PSTN services on the Disconnection Date, SSS as a Special Service Input will not be able to be supplied post the Disconnection Date. While Telstra believes it is unlikely that wholesale customers will be using the SSS to supply Special Services, we would recommend that those Special Services be migrated to the ULLS ahead of the Disconnection Date for the relevant Rollout Region.

Networks will occur in two streams, reflecting the differences between Direct Special Services/Special Service Inputs and all other services.

4 NBN-related General Withdrawal Notice (for the FTTP Rollout)

Telstra has previously issued Wholesale Customers with a general notice covering the progressive withdrawal of services as NBN Co rolls [the NBN Fibre Network](#) out in Rollout Regions (**NBN-related General Withdrawal Notice**).

Separate withdrawal notices will be issued in the future covering one or more Special Service Classes (see below at section 7).

The timing and geographic sequencing of service withdrawal process under the NBN-related General Withdrawal Notice will be driven by [NBN Co's fibre rollout schedule](#) because:

- the trigger dates specified in the NBN-related General Withdrawal Notice are explicitly linked to the key dates notified by NBN Co for each Rollout Region. These dates will be included in the [NBN Co Rollout Schedule on www.telstrawholesale.com/rolloutschedule](#); and
- the end user Premises at which the General Services will be withdrawn are the Fibre Footprint Premises within the NBN Fibre Footprint in each Rollout Region based on NBN Co's notifications. NBN Co will publish the proposed Fibre Footprint list prior to the Region Ready for Service Date for a Rollout Region, comprising the Premises which NBN Co intends to pass with fibre (noting NBN Co may update the list during the Migration Window).

5 NBN-related General Withdrawal Notice (for the FTTN and FTTB Rollout)

We have issued impacted Wholesale Customers with further general notifications regarding the Withdrawal of Telstra Services as part of the FTTN Rollout and FTTB Rollout. Below is some further information in respect of the contents of those notices.

Where will FTTN and FTTB be rolled out?

NBN Co will determine which Rollout Regions will be serviced by FTTN and FTTB technology and these will be announced to industry (see below for how we understand NBN Co's notification process will work).

The Rollout Regions for the FTTB Rollout will be individual MDUs and will comprise all Premises in the relevant MDU. An FTTB Rollout Region may be within a Rollout Region where the NBN is being rolled out using a different technology, such as FTTP, FTTN or HFC.

We understand that, in addition to making available FTTB/FTTN footprint information at <http://www.nbnco.com.au/sell-nbn-services/rollout-map.html>, under the Wholesale Broadband Agreement NBN Co will make available a Monthly RFS Report which will contain up to 12 months' data about upcoming Rollout Regions that NBN Co anticipates will be declared Region Ready for Service. As this information is confidential, we understand that it will only be available to Access Seekers via their Customer SharePoint Notification site at <http://nbnco.com.au/notifications>.

NBN Co Jumpering

To begin supplying a NBN Co FTTB or FTTN Service to a Premises to which General Services are already being provided, NBN Co must gain access to, in the case of FTTN, the copper loop or sub-loop or, in the case of FTTB, to the in-building wiring that connects to the relevant Premises. This might require NBN Co to remove an existing jumper (**In-place Jumper**) over which the General Services are being supplied and replace it with a new Jumper (**NBN Co Jumpering**). For the FTTN Rollout, NBN Co Jumpering to connect a NBN FTTN Service at a Premises



will occur at the NBN Co node that serves the relevant Premises. For the FTTB Rollout, NBN Co Jumpering will occur at the MDF in the relevant MDU, which is usually in a central communications room within the building. NBN Co Jumpering will disconnect only those General Services supplied over the copper loop, sub-loop or in-building wiring jumpered to the NBN Co FTTN / FTTB network. Any General Services provided over other copper loops, sub-loops or in-building wiring at the Premises will not be disconnected.

The timing of withdrawal of General Services as part of the FTTN Rollout and FTTB Rollout is linked to the orders of the NBN FTTN or FTTB Service for the relevant Premises. Withdrawal will occur after a NBN Retail Service Provider orders a NBN FTTN or FTTB Service to be supplied to the Premises at which General Services are being supplied using an In-place Jumper. Withdrawal of General Services as part of the FTTN Rollout and FTTB Rollout cannot occur before the Region Ready for Service Date for the relevant Rollout Region.

At the end of the 'Migration Window' for a Rollout Region, copper services (except for Special Services) that have not been migrated to the NBN will be subject to the mandatory managed disconnection process.

Disconnection of other services provided on the same copper line

NBN Co Jumpering on a copper line (for both FTTN and FTTB) results in disconnection of all copper services provided over that line (except where Voiceband Continuity is provided – see below). When an end user orders a service from you that will use a NBN FTTN or FTTB Service, you should ensure the end user is aware that all existing copper services provided over the same copper line will be disconnected when NBN Co Jumpering occurs on that line.

Continued provision of voice services

NBN Co has indicated that it will provide the option of a partial migration to the NBN which will allow the current service provider to continue to supply circuit switched telephony services on the Telstra copper network. If this option is requested by an end-user, NBN Co will enable Telstra's continued supply to its wholesale customer of the voiceband on copper to the Premises (**Voiceband Continuity**).

Timing of withdrawal – with and without Voiceband Continuity

The General Services which Telstra was supplying to a Wholesale customer by means of the In-place Jumper immediately prior to the NBN Co Jumpering will be withdrawn as follows:

General Service	With Voiceband Continuity	Without Voiceband Continuity
DSL, SSS, DIVO and VISP	Withdrawn (and disconnected) effective from the date NBN Co notifies Telstra of the NBN Co Jumpering.	Withdrawn (and disconnected) effective from the date NBN Co notifies Telstra of the NBN Co Jumpering.
WLR and LCS	Not withdrawn as a result of NBN Co Jumpering. If a Wholesale customer wishes to cancel these services, it will need to place a cancellation order with Telstra, otherwise Telstra will continue to charge for these services. If not cancelled earlier, then those WLR and LCS services will be disconnected at the Disconnection Date for the relevant Rollout Region.	Withdrawn (and disconnected) effective from the date NBN Co notifies Telstra of the NBN Co Jumpering.
ULLS	Withdrawn (and disconnected) effective from the date NBN Co notifies Telstra of the NBN Co Jumpering.	Withdrawn (and disconnected) effective from the date NBN Co notifies Telstra of the NBN Co Jumpering.



	<p>If a Wholesale customer wishes to continue providing services to the Premises using the voiceband, Telstra will supply the customer with access to the voiceband on the same terms and conditions as for ULLS (subject to any necessary variations to reflect the change in nature of the service).</p> <p>This interim voiceband service will be disconnected at the Disconnection Date for the relevant Rollout Region.</p> <p>If you are one of our ULLS customers, we will send to you on request the relevant documentation to vary your existing Supply Agreement if you wish to take up this option.</p>	
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Relationship with the varied Migration Plan

Although Telstra, NBN Co and the Commonwealth have agreed the amendments to the Definitive Agreements to support the MTM Rollout, the ACCC still needs to consider variations to the Migration Plan to incorporate these changes. Telstra has recently lodged a varied Migration Plan for approval by the ACCC. Wholesale customers will have an opportunity to make submissions to the ACCC on the proposed varied Migration Plan.

We will notify you of any changes to the NBN migration procedures described in this document that result from the ACCC's consultation and approval process in relation to the varied Migration Plan.

6 General Services and Phased Withdrawal

What services are covered?

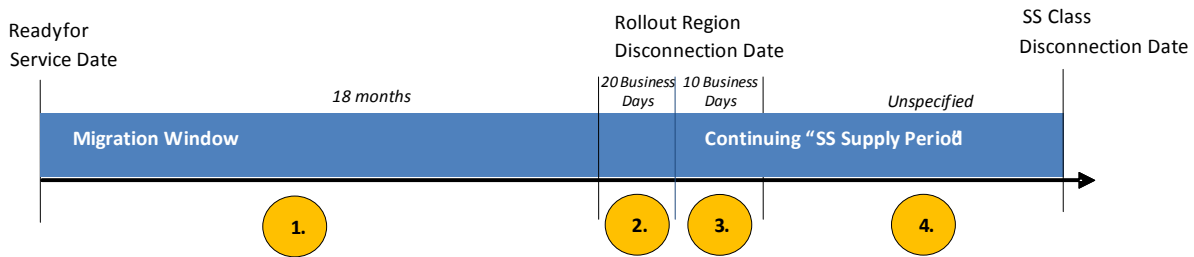
The NBN-related Service Withdrawal Communication will cover the following services:

- Wholesale Line Rental (WLR);
- Local Carriage Service (LCS);
- wholesale DSL;
- vISP (virtual ISP);
- SSS (also known as LSS);
- ULLS (except when used as a Special Service Input)

(together **the General Services**).

Phased Withdrawal

The NBN-related Service Withdrawal Communication provided for a phased withdrawal of the General Services in each Rollout Region. We explain below each of these four phases of service withdrawal:



- Phase 1 – Cease Sale:** Telstra is required to reject an Order for a new copper service if a Premises:
 - is determined by NBN Co to be serviceable by the NBN Fibre Network (**NBN Serviceable**); or
 - is not NBN Serviceable but connection to a Telstra Separating Network would require installation of additional infrastructure,

Cease Sale does not apply to Orders for Direct Special Services or Special Service Inputs if the Disconnection Date for the SS Class has not passed. In each Rollout Region, Cease Sale will commence 10 Business Days after the Region Ready for Service Date notified by NBN Co.

Cease Sale in relation to FTTN and FTTB

We understand that NBN Co is likely to declare some MDU's as 'Ready for Service' for FTTB before the varied Migration Plan is accepted by the ACCC. To avoid uncertainty and potential negative experiences for consumers or businesses in the first areas served by FTTB technology, copper and HFC Cease Sale obligations will not apply to any FTTB premises that are declared Ready for Service until 1 August 2015.

While it may still be some time before a FTTN service is available from NBN Co, Cease Sale will not apply in any FTTN premises until 1 October 2015.

- Phase 2 – Order Stability Period:** So that Telstra can prepare for the orderly disconnection of all remaining General Services at [Fibre Footprint Premises](#) in a Rollout Region, Telstra will apply an Order Stability Period 20 Business Days prior to the Disconnection Date for that Rollout Region. During the Order Stability Period, Telstra must refuse order types in respect of the supply of General Services provided to [any Fibre Footprint Premises](#) in the Rollout Region, other than orders for Direct Special Services or Special Service Inputs, cancellation orders, exchange based barring and suspension of services, order and service remediation, reversals, reconnections for error or credit management purposes, local number portability, changes to services details for nuisance calls and silent line requests or other order types determined following a review of the Order Stability Period in accordance with the Migration Plan to reflect the practical experience of Migration. You will have the opportunity to put your views on any proposed changes to the Order Stability Period and we will notify you in advance of any new requirements once settled.
- Phase 3 – Managed Disconnection:** We are currently updating this section in line with our recent communications to you concerning the Managed Disconnection process, as well as our Managed Disconnection Handbook.

- **Phase 4: Loss of temporary immunity for Special Service Inputs:** From the Disconnection Date for an SS Class, Special Service Inputs covered by that SS Class will lose their temporary immunity and disconnection will proceed as follows:
 - *there will be a 'catch up' disconnection in existing Rollout Regions.* All Special Service Inputs covered by an SS Class located in Rollout Regions whose Disconnection Date preceded the Disconnection Date for the SS Class will be disconnected on the Disconnection Date for the SS Class;
 - *rolling forward, the Special Service Inputs in future Rollout Regions will be treated the same as other General Services.* All Special Service Inputs covered by an SS Class located in Rollout Regions whose Disconnection Date follows the Disconnection Date for the SS Class will be disconnected on the Disconnection Date for the Rollout Region in which they are located.

7 Special Service Class Withdrawal Notices

White Paper process

If NBN Co develops a fibre service substitute for an SS Class, it will release a White Paper announcing the details of such service at the same time to Telstra and other service providers. The Disconnection Date for the SS Class usually will be 36 months after the publication date of the White Paper.

Following the publication of a White Paper, Telstra will issue a service withdrawal notice under its wholesale contracts covering the Direct Special Services within the SS Class. We may not issue the SS Class Withdrawal Notice immediately because we may need to consider whether there are specific issues to be addressed in the withdrawal of the SS Class. However, we will issue the withdrawal notice no later than 18 months before the Disconnection Date for the SS Class.

An SS Class Withdrawal Notice issued on the back of an NBN Co White Paper will provide for the disconnection of Direct Special Services in the withdrawn SS Class as follows:

- *there will be a 'catch up' disconnection in existing Rollout Regions.* All Direct Special Services in the withdrawn SS Class located in Rollout Regions whose Disconnection Date preceded the Disconnection Date for the SS Class will be disconnected on the Disconnection Date for the SS Class;
- *rolling forward, the Direct Special Services in the withdrawn SS Class in future Rollout Regions will be treated the same as other Services.* All Direct Special Services in the SS Class located in Rollout Regions whose Disconnection Date follows the Disconnection Date for the SS Class will be disconnected on the Disconnection Date for the Rollout Region in which they are located – in the same way as General Services.

The Special Service Inputs in the SS Class will be withdrawn in accordance with the NBN-related General Service Withdrawal Notice, as discussed above.

Telstra's "business as usual" (BAU) exit process

The Migration Plan requires Telstra to give a minimum of 18 months' notice of the withdrawal of an SS Class through its BAU exit process.

If Telstra decides to withdraw all services in a SS Class, the Direct Special Services in the SS Class will be disconnected in 'one go' across the whole of the Separating Network on the Disconnection Date for the SS Class specified in the notice.

Again, the Special Service Inputs in the SS Class will be withdrawn in accordance with the NBN-related General Service Withdrawal Notice, as described above. This means that, the Special Service Inputs in the SS Class will be disconnected in the same way as the Special Service Inputs in an SS Class withdrawn through the White Paper process: there will be a 'catch up' in Rollout Regions whose Disconnection Date occurred on or before the

Disconnection Date for the SS Class and then the Special Service Inputs will be disconnected in future Rollout Regions in the same way as other ULLS.

The BAU withdrawal processes under our Supply Agreements will continue to apply to services on Telstra's Exempt Networks (with the notice period required under those contractual provisions). If Telstra is to cease supplying a Service on the Separating Networks to meet our Disconnection Commitments, it may no longer be technically or economically feasible to continue to supply this Service on the Exempt Networks. Therefore, we may take the step of ceasing to supply a Service across both the Separating Networks and the Exempt Networks (i.e. across our entire fixed network).

8 Complaints

Telstra Wholesale has established a process to deal with complaints from wholesale customers arising in the course of Telstra's performance of the Disconnection Commitments. Please view our [Complaints page on Telstrawholesale.com](http://www.telstrawholesale.com) for more information.

While Telstra anticipates being able to work constructively with wholesale customers throughout this process, wholesale customers also can make complaints to the [Independent Telecommunications Adjudicator](http://www.theita.com.au/) about issues arising under the Migration Plan.

9 References

Title/Link	Link
NBN Co Rollout Schedule	http://www.telstrawholesale.com.au/nbn/nbn-rollout/index.htm
Telstra Wholesale Complaints	http://www.telstrawholesale.com.au/working-with-us/operational-support/complaints/index.htm
Independent Telecommunications Adjudicator	http://www.theita.com.au/
Telstra Wholesale's NBN Glossary	http://www.telstrawholesale.com.au/download/document/nbn-glossary.pdf

10 For More Information

Contact your Account Manager for Enquiries and Proposed Changes.

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