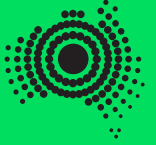FY25
ANNUAL SERVICE IMPROVEMENT PLAN

nbn®

Improving the nbn® Service
Experience Journey

CONTENTS

ABOUT THE ANNUAL SERVICE IMPROVEMENT PLAN

Background

Under Module 4, clause 4A.4 of nbn's Special Access Undertaking (SAU), nbn® is required to publish an Annual Service Improvement Plan (ASIP) detailing initiatives which have the purpose of enhancing the retail service provider (RSP) and/or end user experience that are planned to commence or continue in Financial Year 2025 (FY25) and which nbn® expects will incur material capital or operating expenditure. nbn® published the first ASIP in November 2023. nbn® has consulted with Access Seekers in preparation for ASIP-25.

Purpose and scope

This ASIP summarises:

- nbn's progress on the initiatives included in ASIP-24;
- how nbn® has considered feedback from Access Seekers in the development of ASIP-25;
- those initiatives focused on enhancing the RSP/end user experience commencing or continuing in FY25 for which nbn® has forecast material capital or operating expenditure in its IOP for the FY25 financial year;
- the intended benefits that nbn® expects the initiative to deliver for end users and/or RSPs;
- planned timeframes for nbn® implementing these initiatives;
- the category of capital expenditure or operating expenditure used in the forecasts for the Regulatory Cycle to which the initiative relates; and
- whether nbn® intends to submit a Cost Pass-Through Application in accordance with clause 2D.5 of the SAU.

The ASIP is intended to capture and provide transparency on the key initiatives that underpin nbn's forecast expenditure for uplifting customer experience and service performance for the Regulatory Cycle and complements existing engagements that nbn® has with RSPs on a range of product and service-related matters.

As a wholesale only provider, nbn® seeks to identify and respond to RSP concerns through a number of existing channels including:

- **Dedicated account management and operational engagement teams:** Account management and operational engagement teams are a key interface for RSPs in order to manage operational priorities and WBA matters more broadly. nbn® ensures that all RSPs have continuing access to account managers in order to, among other matters, raise service and operational concerns in order for nbn® to work with RSPs on appropriate and timely solutions; and
- **Product Roadmap and Product Development Forum (PDF):** The Product Roadmap provides stakeholders with a forward-looking view of nbn's products while the PDF provides RSPs (and other PDF members) with the opportunity to submit Product Ideas (including in relation to quality as an important feature/attribute of a product) for consideration through the forum, as well as enable consultation on nbn-proposed Product Ideas.

These channels will continue to be critical for nbn® and RSPs to identify areas of concern (whether related to service quality or otherwise) and potential solutions to address issues as soon as reasonably possible.

The ASIP complements these engagements through provision of a consolidated view of the key service improvement programs planned for the coming financial year.

Executive Summary

In FY24, nbn® successfully completed the majority of the FY24 service experience improvement initiatives outlined in ASIP-24 and made significant progress on the multi-year projects which extend across FY24-FY26.

By the end of March 2024, the FTTN/C to FTTP upgrade program had expanded nbn's FTTP footprint by over 3.5 million premises ready to upgrade, comprised of over 2 million originally FTTN premises and over 1.4 million originally FTTC premises. nbn® remains on track to expand the FTTP footprint to deliver a further 1.5 million originally FTTN premises by December 2025.

nbn® also remains on track to complete the Fixed Wireless upgrade program by December 2024, which focuses on uplifting the typical wholesale busy period speed. Building on the Fixed Wireless Upgrade Program in Q4 FY24, nbn® launched two new Fixed Wireless high-speed tiers (Fixed Wireless Home Fast and Fixed Wireless Superfast) offering increased Peak Information Rates (PIR) and increased the potential maximum Information Rate of its Fixed Wireless Plus service.

Other initiatives outlined in ASIP-24 such as improving RSP experience, enhancing customer service delivery and expanding nbn's internal field workforce were progressed according to plan in FY24.

nbn® published the FY24 ASIP in November 2023 (found here). Throughout November and December 2023, nbn® consulted with Access Seekers to obtain their input on areas of service experience and potential initiatives that nbn® should consider in developing its next ASIP, as well as on initiatives in ASIP-24. In the development of the ASIP-25, nbn® considered the feedback from Access Seekers and assessed each of the proposed initiatives. The scope of the proposed feedback covered a wide range of areas, including:

- Changes to expedited outages and how availability is measured with respect to outages;
- Removal of co-existence;
- Improving advanced notice of New Development locations;
- Fixed Wireless to Fixed Line (N/C) disconnection date not providing enough time to migrate;
- Addressing concerns regarding constant changes to nbn's wholesale products driving cost into RSPs;
- Improvements to the Fibre Connect Program; and
- Improvements to operational processes.

Several proposals were outside of the scope for the ASIP and have been managed through the Annual Service Performance Review (ASPR) process.

nbn's ASIP-25 sets out seven key initiatives which have the purpose of directly and indirectly improving service outcomes for RSPs and their end users. Service improvements are expected to eventuate through focus on the range of attributes along the service experience journey. While improving each attribute will, in its own right, make a positive contribution, it is the combination of improvements across all attributes which is expected to result in incremental, sustainably improved service outcomes.

nbn's initiatives included in the program (as described in this ASIP) focus on:

a) **Building network capability** through investments which expand, modernise and augment the footprint of nbn's FTTP, HFC and Fixed Wireless networks.

b) **System enhancements** which simplify and automate key network management and operational activities in the end-to-end ecosystem.

c) **Continuous improvement** and redesign of processes.

d) **Workforce capacity and capability improvements** for both our internal and delivery partner workforces.

nbn's capital expenditure in FY25 is dominated by two key programs, with the initiatives related to the FTTN/C to FTTP and the Fixed Wireless upgrade programs accounting for approximately 60% of nbn's forecast capital expenditure in FY25. These two programs not only bring with them significant technical capability improvements but are expected to enable a material change in the quality of service experienced by RSPs and their customers. Under the FTTN/C to FTTP program, end users will continue to gain access to higher speeds along with greater consistency of service experience and enhanced network reliability. The Fixed Wireless upgrade program plans to continue expanding the footprint of end users that have access to this technology, and is also intended to uplift the typical wholesale busy period download speed of these services to cater for the introduction of additional high-speed tiers.

As part of the simplification and continuous improvement program there are a range of other initiatives that the nbn® team is working on, which over the course of the year, are expected to result in improved service experience outcomes for RSPs and/or their customers. These improvement initiatives are generally centred around simplifying the platforms and operational environment, improving the reliability of services and products, enabling light-touch and faster service provisioning and fault rectification, and building platforms which enable RSPs to reduce costs and improve consistency of service.

FY25 ANNUAL SERVICE IMPROVEMENT PLAN – EXPENDITURE CATEGORIES FOR INITIATIVES AND COST PASS-THROUGH APPLICATIONS

The table below provides an overview of the service improvement initiatives captured in ASIP-25 and the relevant category of forecast capital expenditure or forecast operating expenditure for the First Regulatory Cycle (FY24 to FY26) to which the initiative relates (consistent with section 4A.4.2(b)(v) of the SAU). While the priority and scope of initiatives, and associated planned expenditure, may evolve between the operating plans for each financial year, the identification of the applicable category is intended to help classify where proposed initiatives sit within nbn's capital envelope relevant to the forecasts for the Regulatory Cycle.

The table sets out: (1) where applicable, the broader program initiatives form part of; (2) the specific initiative; and (3) the applicable capital or operating expenditure category. A description of the relevant expenditure categories is also provided below. It is important to note that nbn® has included some initiatives in the ASIP-25 that may not be forecast to require material capital or operating expenditure (and therefore not required by the SAU to be captured in the ASIP) but which may still lead to an RSP and/or end user benefit.

Program / initiative	Description	SAU Regulatory Cycle capex or opex category
FTTN/C to FTTP	FTTN to FTTP Network Build	**Capability:** Network Upgrade Initiative – FTTN to FTTP Build
	FTTN/C to FTTP Connection Upgrades	**Capability:** Network Upgrade Initiative – Connect (on-demand, and selected proactive migration) – FTTC/FTTN – FTTP
	FTTP Simplification and Continuous Improvement	**Other:** IT (Systems Engineering)
Fixed Wireless	Capacity Upgrades	**Capability:** Fixed Wireless Upgrade
	Satellite to Fixed Wireless Flip	**Capability:** Regional Co-Investment Initiative
	Fixed Wireless Simplification and Continuous Improvement	**Other:** IT (Systems Engineering)
Simplification and Continuous Improvement	Simplify our network for our customers	**Other:** IT (Systems Engineering)
	Enhance Customer Service Delivery	
	Transform RSP Experience	
	Service Evolution	
	Business Operations	

CAPITAL EXPENDITURE CATEGORIES

The capital and operating expenditure categories are based on the descriptions provided by nbn® in the explanatory material accompanying the IOP23 expenditure forecasts, as summarised below.[1]

1 Capability:
Network Upgrade Initiative – FTTN-FTTP Build

Upfront build capex allocated to building fibre deeper into parts of the FTTN footprint – designed to enable up to 3.5 million premises to access wholesale download speeds of 500 Mbps to close to 1 Gbps (nbn® Home Ultrafast) on demand. This capex is applicable to the fibre-deepening program which re-uses the Distribution Fibre Network (DFN) that was deployed as part of the original FTTN build to build the Local Fibre Network (LFN) to enable migrations to FTTP within the selected footprint.[2]

2 Capability:
Network Upgrade Initiative – Connect (on-demand, and selected proactive migration) – FTTC/FTTN – FTTP

Capex allocated to the construction of FTTP lead ins to upgrade premises from either FTTC or FTTN to the FTTP access technology.[3]

3 Capability:
Fixed Wireless upgrades

This covers capital allocated to:

- nbn's ongoing program of Fixed Wireless capacity upgrades that are required to keep up with forecasted traffic growth for each cell and provide for a monthly busy hour cell performance of 6 Mbps or more;[4]

- a major upgrade of the Fixed Wireless network (co-funded via a $480 million grant from the Australian Government and $270 million from nbn) that is designed, by the end of 2024, to:

  i. allow nbn® to deliver 'typical wholesale busy period download speeds' of at least 50 Mbps across the Fixed Wireless network;[5]

  ii. enable the:

    a. launch of two new high speed tiers on Fixed Wireless, being:

       (i). Fixed Wireless Home Fast (200-250 Mbps download Peak Information Rate range, 8-20 upload Peak Information rate range); and

       (ii). Fixed Wireless Superfast (400 Mbps download Peak Information Rate, 10-40 Mbps upload Peak Information Rate);

    b. uplift of the existing Fixed Wireless Plus speed tier from 75 Mbps (download) and 10 Mbps (upload) Peak Maximum Information Rate to 100 Mbps (download) and 20 Mbps (upload) Peak Maximum Information Rate; and

    c. expansion of the Fixed Wireless footprint to enable approximately 120,000 formerly satellite-only premises to access nbn's Fixed Wireless network.[6]

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1. Detail of the capital and operating expenditure categories for IOP23 was provided in Part F: Efficiency of Expenditure and Demand Forecasts of nbn's supporting submission to the SAU variation lodged in November 2022. As described in nbn's supporting submission to the Amended SAU Variation of August 2023 (p.30), the Forecast Nominal ABBRR for the First Regulatory Cycle in that variation was updated in several respects (e.g., for WACC and inflation expectations), but was still based on the IOP23 expenditure forecasts. Part F of the submission accompanying the previous variation (of November 2022) therefore provides the appropriate descriptions of the relevant capital and operating expenditure categories for the purposes of ASIP24.
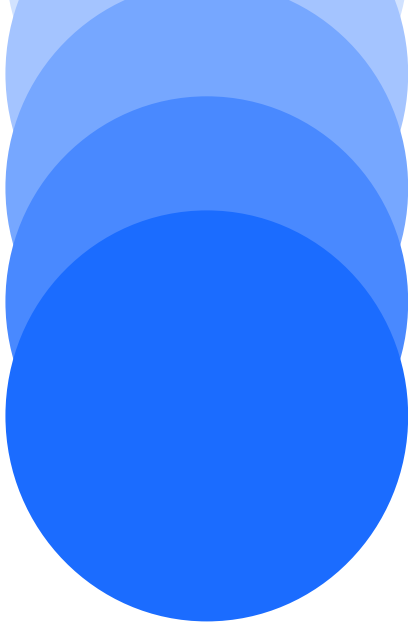
2. See Part F: Efficiency of Expenditure and Demand Forecasts of nbn's supporting submission to the SAU variation lodged in November 2022, pp.44-48.

3. Ibid.

4. This metric is publicly reported at nbn.com.au/updates. nbn® prioritises cells for its capacity upgrade program which fall under its design threshold of 6 Mbps monthly busy hour cell performance (or that nbn® forecasts to fall under this threshold). The calculation of busy hour cell performance accounts for throughput at the radio interface, which is one segment of the Fixed Wireless access network. Actual end user speeds will differ to the monthly busy hour cell performance, and are affected by a number of factors including: the particular application being used and how each application manages packet loss, fixed wireless signal levels, demand from end users, end user equipment, nbn® Fixed Wireless network design and management, and performance elsewhere on the nbn® network.

5. This measure will be an estimate based on a sample of nbn® Fixed Wireless wholesale services and will measure the average speed at certain points in each hour of the busy period between 7-11pm to identify a 'typical busy period speed', in line with the methodology outlined in the ACCC's Broadband Speed Claims Industry Guidance Paper (October 2022). For each sample measured it will take into account factors outside of nbn's control such as environmental impact on radio signal strength, but will not take into account retail level, in-premises or user factors that could impact the end user service. Actual end user speeds will differ as a number of factors influence this, including the particular end user applications in use at the time, end user equipment and software, and the number of concurrent users on the nbn® Fixed Wireless service.

6. See Part F: Efficiency of Expenditure and Demand Forecasts of nbn's supporting submission to the SAU variation lodged in November 2022, pp.44-45, 48-49.

Operating expenditure categories

6 Labour Costs:

Labour Costs relate to the opex required for nbn's internal workforce, which is comprised of a mixture of Full Time Equivalents (**FTEs**) and Temporary Staff Arrangements (**TSAs**) across the following business units:

- Operations (including the internal field workforce);
- Network Engineering and Security;
- Regional Development and Engagement;
- Systems Engineering and Operations (including IT);
- Customer Products and Marketing; and
- Corporate (including Finance, People and Culture, and other corporate teams).[3]

4 Capability:
Regional Co-Investment Initiative

nbn's Regional Co-Investment Initiative complements other network upgrade initiatives through the creation of a $300 million fund to co-invest with federal, state, territory and local governments in programs designed to shift regional premises to more capable technologies. These investments will help meet the growing and diverse needs of Australian homes and businesses.[1]

5 Other:
IT (Systems Engineering)

This relates to business-as-usual IT capex necessary to maintain and adapt IT systems over time and support the achievement of nbn's strategic objectives. A component of this capex relates to nbn's Enterprise Simplicity Initiative designed to:

- reduce the number of IT applications required by nbn® to build and operate the nbn® network;
- simplify architecture to make future changes more cost-effective and easier for both nbn® and RSPs; and
- drive savings in opex with respect to nbn's systems and processes.[2]

7 Direct Operating Costs:
Assurance, Restoration and Maintenance

Direct Operating Costs relate to the opex required to physically operate and maintain the nbn® network. In broad terms, the level of opex in this category is a product of the nbn® network's overall size and composition (with different technologies having different cost characteristics, e.g., FTTN is more maintenance intensive than FTTP). In addition, higher take-up, and usage lead to higher amounts of electricity required to power the nbn® network and higher volumes of service assurance and network assurance incidents, all else the same.[4]
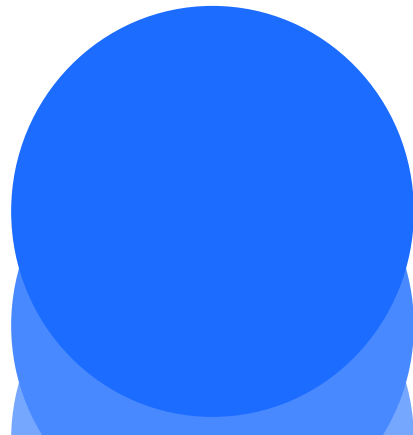
Cost Pass-Through Applications

nbn® does not intend to submit a Cost Pass-Through Application for any of the initiatives included in the ASIP-25.

1. Ibid, pp.50-51
2. Ibid, pp.51-52
3. Ibid, pp.59-60
4. Ibid, pp.55-57

FTTN/FTTC TO FTTP PROGRAM

Program Summary

The FTTN/C to FTTP upgrade program is a multi-year initiative announced on 23 September 2020 and subsequently expanded in October 2022.[1] It is designed to expand nbn's FTTP footprint to an additional 3.5 million originally FTTN premises by the end of 2025 and 1.5 million originally FTTC premises. With approximately 1.2 million FTTP Brownfield premises and 1.5 million FTTP greenfield premises, this would increase nbn's FTTP-accessible footprint to over 7.7 million premises. Together with upgrades to up to 2.5 million HFC premises, nbn® is on target to enable close to 10.2 million premises, or up to 90% of Australian premises within the fixed-line network, with access to the nbn® Home Ultrafast wholesale speed tier, which is capable of achieving wholesale download speeds of 500 Mbps to close to 1 Gbps[2]. Key focus areas for this program are the build, the Fibre Connect Program with RSPs, and simplification of the associated processes.

FTTP – Fibre to the Premise

nbn™ utility box

nbn™ Fibre

All new Greenfields estates receive FTTP and other locations are based on various factors. Customers do have the option of paying for technology of choice.

1. A substantial portion of the upgrade program was undertaken prior to 1 July 2023, under Module 1 of the SAU.
2. Regardless of the retail service purchased, actual wholesale download speeds delivered to providers will be less than 1 Gbps due to equipment and network limitations. An end customer's experience, including the speeds actually achieved over the nbn® network, depends on the nbn® network technology and configuration over which services are delivered to their premises, whether they are using the internet during the busy period, and some factors outside of nbn's control (like their equipment quality, software, chosen broadband plan, signal reception, or how their provider designs its network).

FY24 Review

By the end of March 2024, the FTTN/C to FTTP upgrade program had expanded nbn's FTTP footprint by over 3.5 million premises ready to upgrade, comprised of over 2 million originally FTTN premises and over 1.4 million originally FTTC premises. nbn® remains on track to expand the FTTP footprint by over 5 million premises by December 2025.

nbn® has also delivered improvements to facilitate a faster migration and improve the service experience associated with migration.

- **Incomplete on first appointment:** Some FTTP connect orders are unable to be completed on the initial appointment using industry standard installation practices, and therefore require network remediation activity. These will now be actioned through a refined complex lead-in process designed to give end users, RSPs and technicians a better experience through the complex order completion path with appropriate visibility of the remediation work scope and completion date progress available throughout the process.

- **IT Enhancements** delivered in FY24 included:
  - Enabling back-end changes to release eligible full fibre upgrade locations (i.e. those locations where an FTTP upgrade can be ordered) to the public;
  - Providing IT support to facilitate 'Go To Market' activities such as updating the nbn® website. The "Check-Your-Address" functionality has been improved in FY24, providing better end user visibility of upgrade availability;
  - Changing internal systems to improve RSP visibility of locations that have new technologies, enabling RSPs to market to these locations and increase take-up rate.

Service Benefits

An FTTP-enabled network has many advantages over traditional copper-based networks:

- **Speed performance:** Copper networks face inherent speed limitations when compared to fibre-based networks. The fibre upgrade program plans to significantly increase the number of premises that have access to the nbn® Home Ultrafast wholesale download speed tier, which is capable of achieving wholesale download speeds of 500 Mbps to close to 1 Gbps. In addition to expanding the footprint for higher speed tiers, the FTTP upgrade program will play a role in addressing the small cohort of underperforming copper lines that are not currently capable of achieving speeds of 25 Mbps.

- In 2024, nbn® is also consulting on increasing the speeds on three residential TC-4 speed tiers on FTTP and HFC, and on introducing new TC-4 speed tiers on FTTP and HFC with a download PIR of 2 Gbps. Key aspects of the proposals that are currently under consultation are set out below:

	AVC TC4 Bandwidth Profile Tier	Current AVC TC4 Mbps (PIR)	Proposed AVC TC4 Mbps (PIR)
Existing	Home Fast	100/20	500/50
	Home Superfast	250/25	750/50
	Home Ultrafast[1]	500 to ~1000/50	~1000/100
New	Home Hyperfast HFC		2000/100
	Home Hyperfast FTTP		2000/200
	2000/500 (FTTP)		2000/500

- **Consistency of experience:** A FTTP network also enables end users to encounter a higher consistency of service and user experience. That is, subject to the appropriate capacity being made available by nbn® and RSPs, the speeds experienced by an end user should experience less fluctuation than over copper lines.

- **Network reliability:** Copper lines, particularly those that are aged, can experience reduced speed, instability or cease working completely as a result of external factors such as water ingress. An FTTP network brings significantly improved network reliability due to the inherent technical capabilities and properties of fibre resulting in lower fault rates, less dropouts and greater speed predictability.

As end users progressively take up services on the FTTP network, these benefits should be demonstrated over time through a reduction across the fixed line network in:

- reported access network faults;
- speed related fault enquiries;
- drop out frequency; and
- network remediation activities.

The rate at which these reductions occur is dependent on the rate that end users migrate onto the FTTP network.

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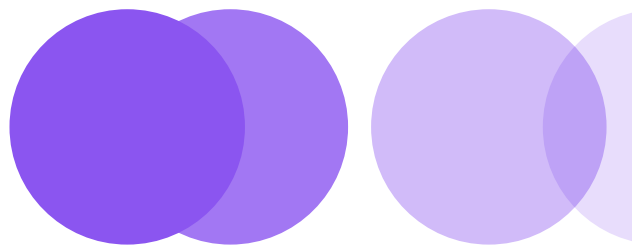
1. Regardless of the retail service purchased, actual wholesale download speeds delivered to providers will be less than 1 Gbps due to equipment and network limitations. An end customer's experience, including the speeds actually achieved over the nbn® network, depends on the nbn® network technology and configuration over which services are delivered to their premises, whether they are using the internet during the busy period, and some factors outside of nbn's control (like their equipment quality, software, chosen broadband plan, signal reception, or how their provider designs its network).

FY25 Planned Timeframes

Network Upgrade Initiative - FTTN to FTTP Build (network enablement and capability)

The FTTN to FTTP build program was announced in September 2020, with work commencing in November 2020 and the current scope of works planned to conclude in December 2025. The Build program is focused on the deployment of a fibre local area network that will ensure nbn's service qualification system is progressively updated so that RSPs and end users are able to place an FTTP order at the associated premises. The key milestones for the FTTN to FTTP build met in FY24 and targeted for FY25 are set out in the table below.

Addressing underperforming lines is a key factor in nbn's FTTP upgrade program. nbn® has overbuilt the access network for an estimated 53,000 underperforming copper lines in FY24 and is targeting up to a further 86,000 in FY25, making fibre speeds available to end users at these premises.

Activity[1]	Actual number of premises in FY24	Targeted number of premises in FY25
FTTN and FTTC premises added to fibre upgrade footprint	1.847m	767k
Cumulative upgradable FTTN and FTTC premises	3.859m	4.472m
Underperforming lines overbuilt	53k	86k

Fibre Connect Program (migration and experience realisation)

Fundamental to realising the service experience benefits of the FTTP upgrade program is the migration of end users from the existing copper network onto the upgraded FTTP network. While nbn® is responsible for the construction of lead-ins to upgrade premises from either FTTC or FTTN to the FTTP access technology, RSPs play a critical role in actively promoting and facilitating this migration. Only when end users have placed an order to connect to FTTP and been migrated will they be able to take advantage of the significant capability enhancements offered by the upgraded network.

To help support the rate at which end users migrate onto the upgraded network, nbn® is working closely with RSPs to actively promote and facilitate a faster and positive service experience in migrating to FTTP technology. Activities in this space that nbn® plans to continue through FY25 include:

- **Promotional marketing and advertising campaigns** from nbn® to raise awareness of upgrades and the benefits of moving to FTTP and higher speed services.
- **Providing marketing support for RSPs** to raise awareness and action from end users through nbn's Marketing Development Funds, where nbn® and RSPs co-fund marketing activity.
- **Rebate programs for RSPs to support promotional offers** and activity by RSPs to encourage customer migrations to FTTP.

Fibre Upgrade FTTC Speed Tier threshold alignment

nbn® changed the eligible speed tier for an FTTC customer ordering a fibre upgrade via Fibre Connect to Home Fast (100/20 Mbps) from 3 July 2024 (the same as the threshold for FTTN customers). Previously, an eligible FTTC customer must have upgraded to Home Superfast (250/25 Mbps) to qualify for an upgrade to fibre via Fibre Connect.

RSPs and customers benefit as:

- nbn® anticipates increased take-up of fibre upgrades from FTTC customers. The price of an eligible plan will be more affordable for end users – including for end users who may have not previously been able to afford a higher speed tier plan.
- This change enables RSPs to simplify their marketing message and execution, making it easier to market to and attract end users.
- Aligning the installation process and eligibility speed tiers across FTTN and FTTC reduces complexity for RSP operations and front-of-house messaging.

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1. Targets prepared in FY 2024 and actual numbers may be different.

FTTP Simplification and Continuous Improvement

In addition to helping support the volume of migrations to the FTTP network, nbn® has committed time and resources to improve the migration experience. Examples of improvements that nbn® will continue to deliver in FY25 to facilitate a faster migration, and improve the service experience associated to the migration, include:

- **Proactively changing the service class of FTTN underperforming lines:** nbn® is seeking to proactively address FTTN services at single dwellings in the FTTP upgrade footprint that cannot attain 25/5 Mbps where they are identified. This means that nbn® will progressively change the service class of these lines as they are identified so that end users are not required to order a higher speed tier at these premises to connect to the FTTP network. This will be applicable to premises with an underperforming line irrespective of whether the end user has an active service or is placing a new connection order. Connection to the network will still be subject to end users/RSPs placing an order for the relevant FTTP service. For underperforming lines in Multi-Dwelling Units (MDUs), nbn® requires agreement with the relevant body corporate or authorised representative of the MDU to install the FTTP Network onto the property.

- **Never Connected:** FTTN premises within the fibre upgrade footprint that have never been connected to the network will be converted to Service Class 1 so that when they first connect to the nbn® network, they are able to place an order for a fibre connection (similar to underperforming lines there is no minimum speed tier requirement for these cases to place an order on the FTTP network once the service class is amended).

- **Fibre Delivery in a Day (FDIAD):** nbn® will continue to focus on its FTTN/FTTC to FTTP upgrade process to facilitate all required works to complete the installation to occur during the customer's connection appointment for the majority of orders removing the need for the pre-activation work order. This efficiency unlocks the potential for shorter lead times for fibre installation (depending on the availability of appointments).

- **Addressing the In-Premises Challenges:** nbn® recognises that as the adoption of FTTP and the take-up of higher speed services occurs there are numerous challenges for RSPs, customers and nbn® relating to how the network should be installed in the premises and what the optimal in-premises configurations (including placement and type of in-premise equipment) might be, that enable RSPs and customers to make well informed choices about how they take advantage of the network and services. In FY25 nbn® will initiate and lead discussions with industry stakeholders to develop a range of options for RSPs and customers to access when making decisions about how to best configure their in-premises network.

- **Fibre Upgrade Education:** nbn® is supporting customers to help them better understand what to expect on the day of their fibre installation such that they can be ready to complete their installation and understand the next steps to make the most of their new upgraded service. nbn® has launched new supporting collateral on its website, with supporting information also made available to retail service providers to embed in their own collateral and to make available to end users. FY25 represents an opportunity for continued engagement with end users and retailers to understand if this material is sufficient to meet industry needs or requires further refinement based on learnings (such as video learning) to deliver optimal outcomes.

- **RSP Fibre Upgrade Journey Optimisation Engagement:** As part of optimising the experience for customers upgrading to FTTP, nbn® has offered RSPs the opportunity to deep dive into the customer experience (CX) for fibre upgrades by sharing an overview of the end-to-end customer journey from the 'Awareness' stage through to 'Use' and 'Assurance' stages, including nbn's CX insights and view of end user profiles. The key objectives of this initiative are:

  — To develop an understanding of the end-to-end customer journey by identifying the customer experience touch points delivered by nbn® and RSPs and the associated impact to customer experience.

  — To ensure clear hand-off of customer touchpoints between the RSPs and nbn® which will streamline the fibre upgrade journey by removing duplication and reducing complexity.

  — To ensure customers are better informed of what to expect before, during and after an upgrade, including improved assurance activities and awareness of the potential for customer devices needing to be upgraded to experience the full potential of the high speeds enabled by fibre throughout the premises.

  — To collaborate on CX improvement initiatives supported through insights and customer research.

- **Introduction of new Network Termination Devices (NTDs):** As part of enhancing the speeds available on FTTP, nbn® has proposed to deploy new NTDs in customer homes for new nbn® connections on the FTTP network. RSPs will be advised of the dates once consultation and final design decisions have concluded. This NTD is a 1 port NTD and will support download speed profiles up to 2Gbps. This new NTD would provide the following benefits:

  — **Appearance** - reduced size allowing for a more discrete placement in the home;

  — **Sustainability** – the potential to reduce energy usage by ~40% for customers compared with our existing NTDs;

  — **Performance** – download speeds up to 2Gbps; and

  — **Assurance** - capable of providing industry standard speed testing which will assist in the faster resolution of service incidents.

nbn® also proposes to introduce a new model 4-port NTD for deployment in certain scenarios.

Network enhancements: To further enhance monitoring of FTTP service performance in FY25, nbn® plans to introduce new capability to monitor individual service performance at a more granular level including upstream and downstream optical levels and error rates. The objective is to improve detection and proactively manage network issues, reducing the need for end users to report issues to their RSP and be present for an assurance appointment for issues likely outside of their premises. This data is planned to be translated to RSPs via our FTTP Service Health Summary with associated thresholds which if breached would indicate a fault should be raised to nbn for investigation, enabling more service issues to be resolved for end users.
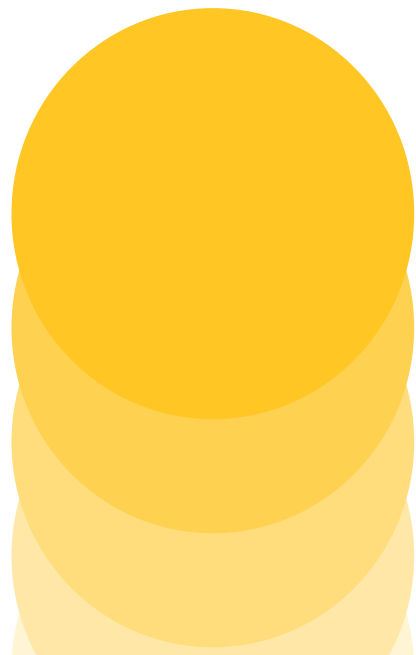
FIXED WIRELESS UPGRADE PROGRAM

Program Summary

nbn® is undertaking a major upgrade of the Fixed Wireless network to increase both the capacity and coverage of the nbn® Fixed Wireless network. As part of this initiative total cells in the network are planned to increase from 23k to ~100k by December 2024. This is an increase of ~40k above the figure advised in ASIP-24. Increasing the cells in the network provides greater capacity and throughput utilisation resulting in the number of users per cell moving from approximately 18 premises per cell to 3-4 premises per cell. The program plans to ultimately deliver an expanded coverage footprint and access to faster speeds across the nbn® Fixed Wireless network as well as a significant uplift in available capacity and more data for nbn® Sky Muster® customers.
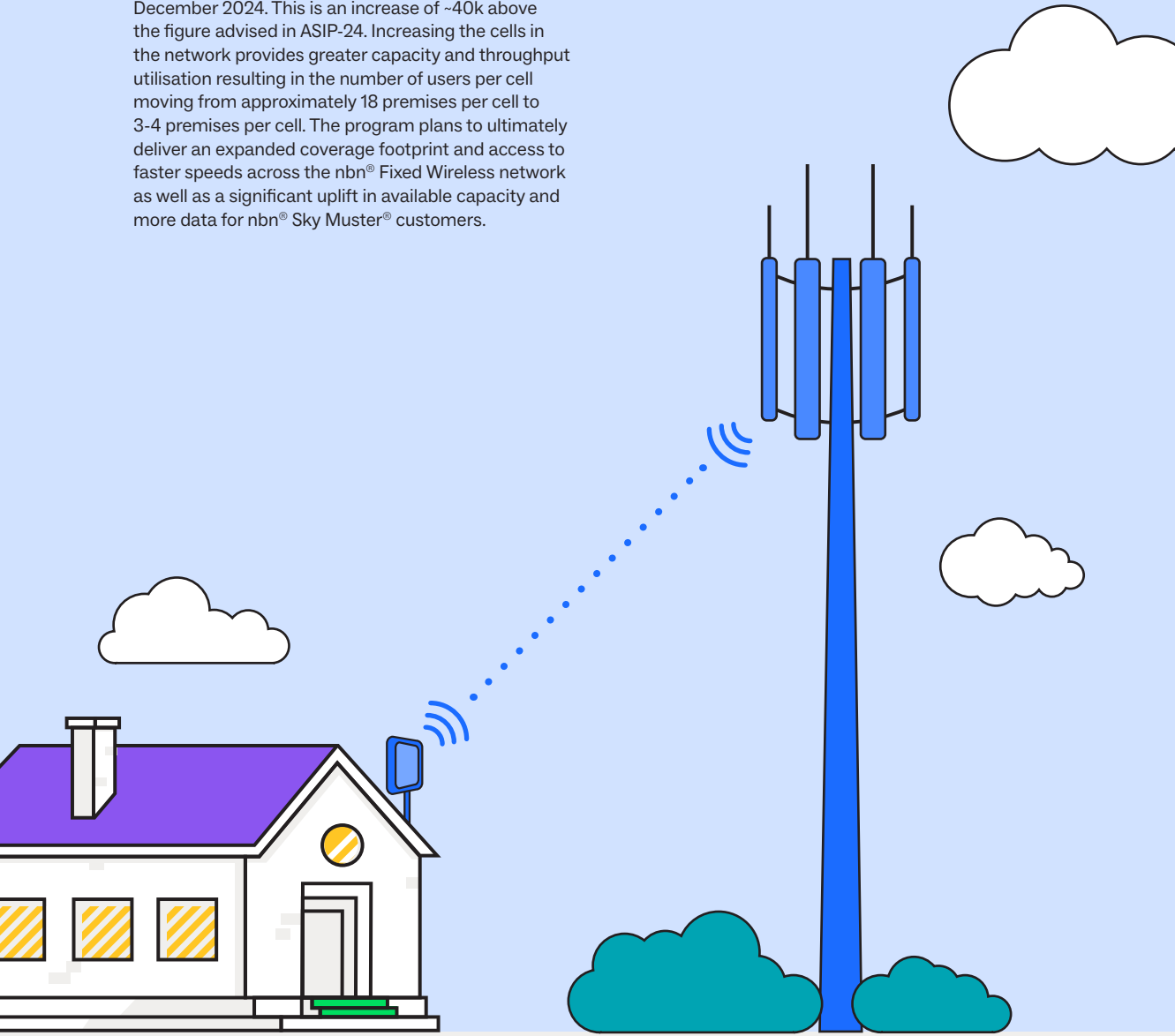
FY24 Review

In FY24, building on the Fixed Wireless Upgrade Program, nbn® launched two new Fixed Wireless high-speed tiers (Fixed Wireless Home Fast and Fixed Wireless Superfast), offering increased Peak Information Rates (PIR) and uplifting the typical wholesale busy period speed. nbn® also increased the potential maximum Information Rate of its Fixed Wireless Plus service. nbn® has delivered the following in FY24 and is on track to deliver the full program by December 2024:

- Commencing in November 2023, the W-NTD upgrade project began migrating older V1 and V2 Fixed Wireless devices to V3 and V4s and have completed ~26,000 migrations.

As of June 2024, nbn® has flipped ~50k Satellite services to Fixed Wireless.

- nbn® will have completed 12 Upgrade Areas[1] by June 2024. In February 2024, nbn® moved to flip the access technology available from Satellite to Fixed Wireless once a site within an upgrade area had been completed, releasing more LOCs to market earlier, with ~60% of sites upgraded.to date.
- Converted 60% of the never connected satellite premises within the Fixed Wireless footprint to Service Class 5.

In December 2023 nbn® achieved the first 25% of marketable areas achieving typical busy hour speeds of 50 Mbps.

- Released promotional and marketing advertising campaigns to end customers to raise awareness of the benefits.
- Monthly bulletins released with indicative and actual Satellite to Fixed Wireless flipped LOC IDs (indicating planned and actual availability of Fixed Wireless for ordering at the premises).
- Delivered improvements on service qualification and additional reporting on service experience.

IT enhancements to improve RSP visibility of locations that have new technologies. These enhancements include new fields added to the Connectivity and Performance category of the Service Health Summary. These new fields will assist RSPs to better understand the health of a service and assist in the troubleshooting process.

- Enabled back-end changes to release eligible Fixed Wireless upgrade locations to the public via Check Your Address.
- Uplifted the existing Fixed Wireless Plus speed tier with a maximum wholesale Peak Information Rate of 100 Mbps (download) and 20 Mbps (upload).
- Launched two new higher speed wholesale plans available to order, via RSPs, in June 2024. These new higher speed plans include:
  — nbn® Fixed Wireless Home Fast with a wholesale Peak Information Rate range of 200-250 Mbps (download) and 8-20 Mbps (upload).[2]
  — nbn® Fixed Wireless Superfast with a wholesale Peak Information Rate range of 400 Mbps (download) and 10-40 Mbps (upload).

- Additional Reporting: From June 2024, a daily report was made available to RSPs (via the customer centre and an API) in relation to new higher speed tier services for the first 30 days from activation for monitoring of service performance. The daily report includes results from actual throughput tests conducted for the relevant service from the nbn® Point of Interconnect (POI) to the W-NTD.

1. An Upgrade Area is a group of Fixed Wireless network sites in a contiguous geographic area that nbn® plans to upgrade as a group.
2. An end user's experience, including the speeds actually achieved over the nbn® network, depends on the nbn® network technology and configuration over which services are delivered to the user's premises, whether the user is using the internet during the busy period, and some factors outside nbn's control (like the user's equipment quality, software, broadband plans, signal reception and how the service provider designs its network). Speeds may be impacted by the number of concurrent users on nbn's Fixed Wireless network, including during busy periods.

Planned Service Benefits from this program

Upgrading the Fixed Wireless network is designed to give more homes and businesses access to faster download speeds. nbn® is targeting that by the end of calendar year 2024, the upgraded nbn® Fixed Wireless network will reach over 750,000 homes and businesses, the majority existing in regional and rural communities of Australia.

In addition to the increased reach, the Fixed Wireless Upgrade Program proposes to:

- Enable faster speeds across the Fixed Wireless network, including at the busiest times.[1] nbn® has commenced a trial with RSPs to implement a new measure to indicate the network's capability to achieve 'typical wholesale busy period speeds' of at least 50 Mbps (download).[2]

- Uplift the existing Fixed Wireless Plus speed tier to speeds up to 100 Mbps (download) and 20 Mbps (upload).[3]

- From mid-2024 launch two new high-speed tiers available to order, via RSPs. These high-speed tiers are:
  — nbn® Fixed Wireless Home Fast: with a wholesale Peak Information Rate range of 200-250 Mbps (download) and 8-20 Mbps (upload); and
  — nbn® Fixed Wireless Superfast: with a wholesale Peak Information Rate of 400 Mbps (download) and range of 10-40 Mbps (upload).

- Optimise the Fixed Wireless network, through the installation of next generation 4G and 5G equipment. This new technology is designed to deliver more reach (by extending the range of some towers from 14km to up to 29kms) and access to more speed to regional and remote Australia; and

- Improve network performance and service experience by modernising older Wireless Network Termination Devices (**W-NTDs**) to V3 and V4 models. These upgrades require a truck roll (at no cost to the end user) and require RSP involvement in order for appointments to be booked with end users. The V3 and V4 models will support the higher speed tiers once launched. nbn® is working closely with RSPs to uplift the appointment-based migrations from V1 and V2s to V3 and V4s.

Expanding the reach of the nbn® Fixed Wireless network and migrating approximately 120,000 satellite-only premises to the Fixed Wireless network, will enable more people currently in nbn® satellite areas access to Fixed Wireless.

In switching to nbn's Fixed Wireless footprint, these end users will benefit from:

- access to higher speed options compared to the nbn® Satellite network; and

- improvement in the quality of voice communications, due to lower latency.

Enhanced data limits and network performance for nbn® Sky Muster Plus satellite services

For the homes and small businesses that remain on nbn® Satellite, the Fixed Wireless upgrade enabled nbn® to launch nbn® Sky Muster Plus Premium plans in 2023. The plans provide uncapped data usage (subject to fair use and shaping conditions) are available on a range of different wholesale download speed tier options and at wholesale price points to meet a variety of needs and budgets.

1. Faster download speeds mean less buffering where it was caused by slower download speeds. Note that the amount of buffering you experience may be affected by other factors such as faulty in-home network connectivity. An end user's experience, including the speeds actually achieved over the nbn® network, depends on the nbn® network technology and configuration over which services are delivered to the user's premises, whether the user is using the internet during the busy period, and some factors outside nbn's control (like the user's equipment quality, software, broadband plans, signal reception and how the service provider designs its network). Speeds may be impacted by the number of concurrent users on nbn's Fixed Wireless network, including during busy periods.

2. This measure will be an estimate based on a sample of nbn® Fixed Wireless wholesale services and will measure the average speed at certain points in each hour of the busy period between 7-11pm to identify a 'typical busy period speed', in line with the methodology outlined in the ACCC's Broadband Speed Claims Industry Guidance Paper (October 2022). For each sample measured it will take into account factors outside of nbn's control such as environmental impact on radio signal strength, but will not take into account retail level, in-premises or user factors that could impact the end user service. Actual end user speeds will differ as a number of factors influence this, including the particular end user applications in use at the time, end user equipment and software, and the number of concurrent users on the nbn® Fixed Wireless service.

3. An end user's experience, including the speeds actually achieved over the nbn® network, depends on the nbn® network technology and configuration over which services are delivered to the user's premises, whether the user is using the internet during the busy period, and some factors outside nbn's control (like the user's equipment quality, software, broadband plans, signal reception and how the service provider designs its network). Speeds may be impacted by the number of concurrent users on nbn's Fixed Wireless network, including during busy periods.

FY25 Planned Timeframes

Fixed Wireless site upgrade (enablement and capability)

The Fixed Wireless build program commenced on 22 June 2022, with the nbn® Fixed Wireless High-Speed Tiers and Fixed Wireless Enhanced and Expanded Coverage Consultation Paper published on 15 August 2022. The current scope of works is targeting completion in late 2024. The build program is focused on the upgrade of the Fixed Wireless network, and the expansion of Fixed Wireless coverage, to uplift the 'typical wholesale busy period speed'. nbn® will ensure nbn's service qualification system is updated, so that RSPs and end users are able to place a Fixed Wireless order at the associated premises.

The key milestones for the Fixed Wireless site upgrade program anticipated for December 2024 are set out in the table below:

Program Target[1]	Total Target	Completed FY24	Planned FY25
Target number of planned Upgrade Areas	84	12	72
Target number of Satellite addresses[2] converted to Fixed Wireless	120,000	~50k	~70k

Fixed Wireless Program (migration and experience realisation)

Recognising the evolving needs of the market and the vital role RSPs play in actively promoting and facilitating migration to the Fixed Wireless Network, nbn® is working closely with RSPs to actively promote and facilitate a faster and positive migration and service experience.

Activities in this space that nbn® plans to continue through FY25 include:

- **Promotional marketing and advertising campaigns** from nbn® to raise awareness of upgrades and the benefits of moving to Fixed Wireless and higher-speed services are available via the nbn® web page, Upgrades to nbn® Fixed Wireless | nbn® (nbnco.com.au)
- **Upgrades to the latest generation technology:** nbn® will continue to offer to replace older generation W-NTDs with the latest models. With substantial performance improvement over legacy equipment, improved customer experience is anticipated.

Simplification and Continuous Improvement

In addition to supporting the volume of migrations to the Fixed Wireless network, nbn® has dedicated significant time and resources to improving the migration experience. Examples of improvements that nbn® has delivered in FY24 and will continue to utilise in FY25 to facilitate a faster migration, and improve the service experience associated with the migration, include:

- **RSPs go-to-market planning:** nbn® is sharing with RSPs planned upgrade areas and forecast LOCIDs (locations forecast to be included in the footprint) via operations bulletins.
- **Service Qualification:** To better enable RSPs to manage end users, in April 2024 nbn® introduced a maximum attainable wholesale speed calculation at the point of service qualification, allowing RSPs to assess the availability and potential for the end user premises to access one of the new Fixed Wireless higher speed tiers.
- **IT Enhancements** planned for FY25 include:
  — Changes to internal systems to improve RSP visibility of locations that have new technologies, enabling RSPs to market to these locations and understand take-up rate; and
  — Enhancements to and new information available through the Service Portal, Service Health Summary, and introduction of new APIs to assist RSPs in managing new services.

1. Targets per IOP24.
2. Address locations which can currently only access nbn® by Satellite and will be converted to the Fixed Wireless footprint.

SIMPLIFY OUR NETWORK FOR OUR CUSTOMERS

Program Summary

nbn's Network Simplification is a multi-year program which commenced in 2022. The program involves timely investment focusing on efficiently addressing equipment end-of-life events and ensuring capacity is available for existing customers.

The FTTP network will be evolved via the delivery of a new platform to mitigate lifecycle risks, meet capacity growth, and enable future products such as multi-gigabit residential and business services.

The HFC network will be evolved via plant modernisation that unlocks the possibility to transition towards the Distributed Access Architecture over time to meet increased customer usage and unlock multi-gig speeds.

The transport and aggregation networks will be evolved to address lifecycle risks and increase scale resulting in an evolved network that has addressed end of life events whilst meeting RSP and end user demands, specifically:

- Multi-gigabit capability; and
- Higher speed interconnect incrementally available for RSPs across POIs.

Each evolution step will be used to move towards standards-based network management platforms.

Planned service benefits

The key benefit of this investment is to ensure end users are not impacted by technology end of life events and they will continue to obtain a quality service over these networks. The benefits include:

- minimising service disruptions; and
- supporting continued quality of service experience.

This network investment also ensures the evolving needs of our customers will be met, providing capacity to meet growing data demand whilst also enabling multi-gig speeds over time.

FY24 and FY25 Timeframe Update

In Q2 FY24, nbn® commenced the HFC plant modernisation activities, involving the replacement of active (powered) equipment (nodes and amplifiers) in the HFC network in targeted areas where additional capacity is required. Upon replacement, nbn® plans to enable additional upstream capacity for the customers in the targeted areas.

- In FY24, nbn® completed 200 segments under the HFC plant modernisation program (each segment provides coverage to ~250 premises).
- In FY25, nbn® plans to complete an additional 1000 segments.

In Q4 FY24, nbn® commenced scaled deployment of the next generation FTTP platform including the installation of new, XGS-PON capable Optical Line Terminal (OLT) equipment at Fibre Active Node (FAN) exchanges, providing capacity uplifts and enabling future multi-gigabit speeds to ~40k services. Throughout FY25, the rollout to next generation OLTs will continue expanding our footprint coverage to ~500K services.

In FY24, nbn® continued the upgrade of the aggregation infrastructure at POI sites and ~50% of POI sites have now been upgraded. In FY25, nbn® plans to continue the upgrade with an additional ~12 sites.
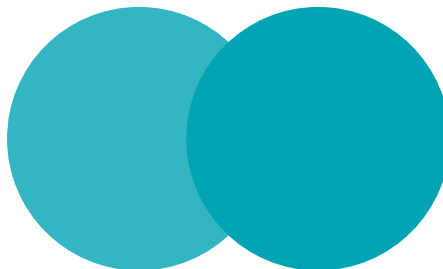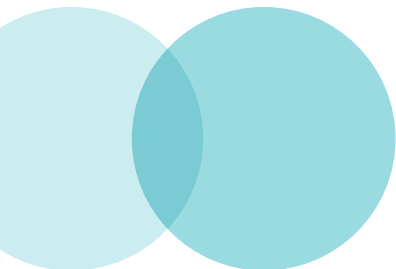
ENHANCE CUSTOMER SERVICE DELIVERY

Program Summary

Enhance Customer Service Delivery (**ECSD**) is a multi-year program, now in its third year of delivery. The ECSD program specifically focuses on driving improvements across activations, network, and service assurance with the primary goal of uplifting the service experience through reducing RSP and end user effort.

FY24 Review

- nbn® leveraged existing and **new service diagnostic capabilities on the FTTN access technology**, with improved **pattern alarm profiling**, to proactively identify and restore individual service faults. The focus of the program was to improve the product and service experience by reducing the need for RSPs and end users to reactively raise service faults. Between May 2023 – August 2023, nbn® completed a pilot to address a small subset of services that were potentially causing a significant number of resyncs on a customer's service. nbn® advised RSPs that many of these potential performance impacts could be addressed without access to the premises:

  — 60% (1221) of services within the pilot were able to be fully resolved externally via a commitment.

  — Participating RSPs were informed of the remaining 40% and if an appointment was scheduled, the majority were resolved as Fault Found and rectified on the day.

- In Q4 FY24, nbn® deployed key changes to **nbn's service health reporting** for our RSPs. This provided RSPs with the ability to self-serve critical service health data and extend the current data set to facilitate upfront assurance investigations – including in relation to speed, stability, and other in-home elements. New reports were created for HFC and FTTP and stability (drop out) data was added to existing FTTN, B and C technology data sets which enabled RSPs to match actual network performance information with the lived experience when discussing service issues with end users.

- In FY24, we simplified activities and tasks within the case management function to ensure the provision of frequent updates to RSPs with an increased adherence to case milestones, enabling more efficient customer communication across the order/incident journey.

- nbn's online new development application request form has been redesigned and enhanced.

- nbn® partnered with RSPs through workshops in February 2024 and gathered insights into the activation experience through external research and operational performance analysis and assessed opportunities to discuss within the RSP workshops. nbn® is currently reviewing feedback and improvement opportunities and plans to further engage with industry in H2 FY25 through the Product Development Consultation process.

- In Q1 FY24, nbn® deployed changes to the Point of No Return business rules where, in the event of an appointment change, RSPs are now able to self-serve closer to the appointment start time, including rescheduling, cancelling or amending customer contact and site appointment details.

Planned service benefits from this program

The Enhance Customer Service Delivery program's measures of success have evolved for FY25, focusing on:

- **Reduction in cost to serve for RSPs and nbn®** by driving a reduction in service disruptions, wasted truck rolls and customer effort. This will be achieved through the proactive detection and repair of performance issues, reduced repeat appointments and faster connection and restoration of services, as well as field work force enhancements;

- **Improvement to the RSPs and end user experience** through improved nbn® communications and process enhancements; and

- **Expanding the proactive fibre upgrade use cases**.

FY24 and FY25 Timeframe Update

Key areas of focus for FY24, which will continue into FY25 include:

In conjunction with the fibre upgrade program, the **proactive identification of individual FTTN underperforming lines within the FTTP footprint.**

The objective is to proactively and progressively change the service class of these customers to enable a simpler and quicker migration to FTTP, improving the end user experience and service performance.

- In FY24, nbn® advised RSPs of the enablement of orderable fibre services at certain premises that were already connected within the Fibre Connect 'Ready For Order' (RFO) footprint without RSPs needing to order a High Speed Tier service. These premises included:
  — 57,000 FTTN underperforming lines where a service was unable to achieve 25 Mbps in the downlink and/or 5 Mbps in the uplink.
  — 156,000 services eligible for Assurance fibre upgrades, where a service can't achieve 50 Mbps in the downlink, has sustained dropouts or has experienced multiple truck-rolls in the last year.
- In Q1 FY25, nbn® will commence discussions with RSPs to further optimise fibre connections and the upgrade process.

Drive a proactive assurance focus on Satellite performance nationally through analysis of satellite signal performance to predict the end user experience.

This will inform the actions required to rectify issues before the end user experiences an interruption to their service, mitigating the risk of restoration delays whilst reducing the need for end users to raise an incident ticket with their RSP.

- In FY24, a proactive assurance pilot was conducted within limited access regions (islands) where end users who may have been experiencing one or more of the following symptoms were targeted: (1) poor performance on the return link that resulted in a slower upload speed for the end user; (2) poor performance on the forward link that resulted in an increased chance of dropouts and potentially lower speeds; or (3) poor performance on either the forward or return link that resulted in service degradation during poor weather.

- For 79% of the scheduled truck rolls, there was a 3-4 times improvement in signal strength providing end users with a more stable service and increased potential to obtain peak speeds for their services.

- Whilst the current proactive assurance Satellite work is on track to complete in FY25, nbn® will continue to proactively review Satellite performance for service improvement opportunities.

Partnering with industry to drive a **seamless connection process for new residential and small business developments**, ensuring upstream processes are optimised, and that necessary works are complete prior to homeowners or tenants transitioning into their new dwelling.

- In FY25, nbn® is planning to assess the RSP feedback received during workshops and consultation and provide a timeline for the ongoing and continuous improvements planned to be delivered through a test and learn approach.

nbn® is continuing with a focus **on minimising waste, improving quality and reducing customer effort**. This includes multiple initiatives to reduce unnecessary and repeat truck rolls by improving the end-to-end workflow processes, and leveraging diagnostics to improve remote resolution of issues, reduce no fault found (NFF) and end user not in attendance (NIA).

- In FY24, nbn® implemented Service Monitoring Automation for fibre, which saw a reduction in wasted truck rolls where a service came back online post Trouble Ticket submission to nbn, mitigating the need for a customer to wait at home when their service came back online.

- In FY25, additional detail to help drive no fault found improvements will be announced formally to RSPs during planned consultation. This was originally intended to occur in Q3 FY24 but is now likely to occur in Q1 FY25.

- Throughout FY25, nbn® will continue to ideate and partner with RSPs to address any opportunities that may help drive further improvements to NFF or NIA.

Continuing to digitally transform nbn® Field Services:
The Field Digital Transformation program compliments the expansion of nbn's internal workforce (outlined in Section 9) and is central to enabling the following enhancements:

- In FY24 nbn:
  - **Optimised and consolidated** the way work it managed and dispatched to the field via a simplified work operation centre.
  - Changed the way Field Services undertake the **FTTN/C to FTTP upgrades** through workflow optimisation that will support Fibre Delivery in a Day, which was launched in July 2023 and was expanded nationally in April 2024.,
  - Delivered enhancements of **the digital toolset for technicians** through continued development and enhancement of applications and testing tools within the technician toolkit that provides enhanced information at a technician's fingertips, allowing for efficient and more expedient resolution of customer connection orders and service assurance incidents.

- In FY25, nbn® will continue to digitally transform nbn® Field Services to improve the connection and assurance journey across all technologies and improve service experience for our customers. Key initiatives will include:
  - **Implementing strategic test and diagnostic tools** to improve quality, reduce calls from technicians into support teams and improve technician productivity, providing alignment and enhanced testing and diagnostics which is fit for purpose for RSPs, nbn® and Service Delivery Partners.
  - Establishing **Gen AI driven text and voice analytics**, with Field chats being the first use case, to drive waste out to improve technician productivity.
  - Delivering **technician self-serve tools** to improve safety, quality, productivity, and technician experience (employee engagement).
  - Implementing **enhanced field practices** across technologies to improve on the day experience and performance.
  - Continuation of the uplift of the **internal workforce**, specifically focussing on uplift of skills in HFC to directly support HFC Plant Modernisation and the introduction of the high-speed tiers to HFC, to enable minimised customer impact through direct control of scope. The **traineeship** program will also continue with two small intakes of new to industry technicians.

— nbn® is continuing to ideate possible solutions for the FTTC Neighbourhood Watch initiative where RSPs receive notifications through a network outage when nbn® determines a FTTC DPU has gone down, and a network fix is in progress to resolve the issue. nbn® will engage and provide RSPs further information on this in FY25.

**New key focus areas that nbn® is planning for FY25 include:**

Targeted improvements to the top causes for RSPs and end users requiring contact with nbn® for general enquiries through development of self-service solutions. This also includes workflow review and where required process re-design to reduce complexity, errors and fallouts.

The introduction **of new capabilities to transform how nbn's contact centres operate** and serve by providing faster and enhanced responses for RSPs and end users.

Partnering with RSPs to **develop and pilot a new process** that will look to **streamline the current Assure and Connect processes to make it possible for an existing FTTN premises to flip to fibre during an Assurance incident.**

nbn® will **conduct an extensive internal review of communications across the Activate, Operate and Assure customer journeys**. As part of this focus, nbn® will continue to engage and work closely with RSPs to further streamline RSP communications, improve clarity around restoration work and timeframes, and provide tailored services for complex sites.

nbn® plans to build, test and **operationalise an enhanced service transfer process** which aims to help RSPs more accurately identify which nbn® service to transfer for the end user. This should mitigate for the disruption caused when services are transferred in error and subsequently require a service transfer reversal.
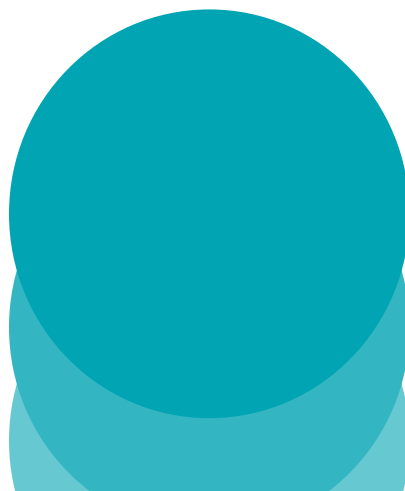
TRANSFORM RSP EXPERIENCE

Program Summary

nbn® has established a multi-year program to Transform RSP Experience which is focused on delivering continual improvement and uplifting RSP experience.

Like all providers in the telecommunications industry, nbn® is striving to make its products and services more affordable, simpler, and easier to deliver to better enable RSPs to sell and end customers to use.

RSP and end user feedback and collaboration are crucial in this process and although nbn® has initiatives underway, there is more to be done.

nbn® is planning to introduce further changes to how it engages with the industry to ensure delivery of products and services is more structured and planned in execution, predictable in delivery dates, better coordinated between nbn® and RSPs, and meets channel capacity to implement.

This program is centred around improving communication frequency and reliability to RSPs, removing complexity, and simplifying nbn® operational interactions based on RSP survey feedback, increased efficiency and reduced costs through automation, data insights and innovation.

FY24 Review

Key benefits delivered in FY24 under this program include:

- **Enhanced Stability:** The program ensured the stability of critical nbn® systems that RSPs rely on for business interactions with nbn.
- **Digital Tools Improvement:** The program led to enhancements in Assurance Tools, including Service Health Summary for Satellite, and an increase in RSP API digital platform utilisation.
- **Structured Planning Cadence:** A new structured planning process was established, providing nbn® partners with predictable quarterly plans. This transparency helps RSPs anticipate future initiatives that nbn® plans to launch in the market.
- **Improved RSP Relationship and Engagement:** Renewed Account Management focus, including a new account model, customised account plans, and increased in-market presence by the account team.
- **Enhanced Channel Communication:** Through a coordinated approach with RSP Communication, there has been a reduction in communication volume

and frequency (weekly), along with the establishment of monthly RSP Webinars.

- **NITT Tool Improvements:** Enhancements have been made to the Non-Infrastructure Type Transfers (NITT) tool, making Change of Ownership processing more efficient.
- **NNI Enhancements:** These improvements streamlined NNI changes, making them more efficient through a simplified migration process. For RSPs, this translates to a more straightforward and cost-effective way to scale and modify physical connectivity at nbn® POIs.
- **SHS Enhancements:** These improvements focused on enhancing the Service Health Summary for FTTN/B connections.
- **Trouble Ticket Cancel Enhancement Delivery:** This enhancement will give RSPs the ability to cancel an assurance trouble ticket right up to the point before a field technician accepts the work order.

The following activities planned for in FY24, were put on hold and may be considered in the future.

- **NPIS Address API Enhancement:** The development of NPIS Address API Uplift & Fuzzy Search functionality aims to add 'fuzzy' search logic to the existing NPIS Address API. This enhancement will enable RSPs to better match geographical addresses to nbn® LOCIDs.
- **FTTP Pulse Functionality:** As part of additional RSP tools for service health diagnosis, the FTTP Pulse functionality will enhance the Service Heath Summary by performing advanced tests when needed. This aims to eliminate the need for RSPs to handle these complex tasks themselves and provide customers with confidence regarding the next steps in the lifecycle of a trouble ticket (e.g., truck roll, operator investigation, or NO Fault Found). However, this implementation has been placed on hold for further assessment in line with the current benefit proposition, in order to streamline the number of IT changes and optimise alignment with future NTD and speed testing capabilities.

Planned service benefits for FY25

In FY25, nbn® is proactively enhancing processes to improve predictability and efficiency. This effort aims to provide RSPs with advance notice of product changes and marketing initiatives. The program is expected to drive service experience improvements for both RSPs and end users.

Planned and Predictable

- **Subscription Based RSP Communications:** Reduced volume of RSP communications by implementing new technical capability (via Portal) allowing RSPs to subscribe, select and manage the type of RSP communications they receive from nbn.

Operational Excellence

- **Billing and Operational Improvements:** nbn® will undertake a 6-month Proof of Concept Trial of proactive detection monitoring and self-generated exceptions, commencing in September/October. The aim is to investigate option viability to providing improvements to the billing experience with less manual interventions and reduced complaints. By making the wholesale billing experience easier and less problematic for RSPs, it is expected this will also have indirect benefits for the end user experience.

Digital Experience

- **Service Health Assurance Tool Enhancements:** Delivering incremental updates to Service Health Assurance tools which have been requested by RSPs to provide process improvement uplifts.
- **API Uplift:** Delivering capability by augmenting the current API offering to ensure consistent programmatic accesses to essential operational data including order history, trouble ticket history archive and more.

FY25 Planned Timeframes

Planned and Predictable

- **Subscription Based RSP Communications:** Planned to be delivered by June 2025.

Operational Excellence

- **Billing and Operational Improvements:** POC Timeframe Sep/Oct 2024 – Feb/Mar 2025, pending trial outcome solutioning and costs. Solution if approved targeted to be delivered by June 2026.

Digital Experience

- **Service Health Assurance Tool Enhancements:** Planned to be delivered by June 2025.
- **API Uplift:** Planned phased delivery by August 2025 (into FY26).

SERVICE EVOLUTION

Program Summary

While the mixed technology model has helped getting premises connected to high-speed broadband services faster, it has resulted in multiple systems and technology-specific bespoke processes for customer and network service teams. Under the multi-year Service Evolution program nbn® plans to implement standardisation of customer and network service processes across all network access technologies centred around the following primary service activities:

- Ordering (New/modify/disconnects);
- Service faults (proactive/reactive);
- Network management and faults;
- Customer communication; and
- Customer enquiries.

This aims to establish a single view of all customer service impacting events – irrespective of access technology – within nbn® to enable greater consistency in the management of customer orders, service faults, network outages (planned/unplanned), and performance degradation.

FY24 Review

In FY24, the program stood up the foundation platform as planned in Q3. This strategic IT platform will enable the management of customer and network events in a single system. The delivery of the foundation platform also allowed nbn® to start delivering Network Change management capability, starting with the low-risk network changes that do not have any impacts to RSPs or end customers. The remainder of the Customer and Network service processes will migrate onto the new platform over FY25-27.

Planned service benefits

Standardisation of our customer and network service processes is expected to have direct benefits for nbn's operational efficiency. These operational benefits are also expected to result in improved RSP experience including through the following changes:

- **Improved RSP communication:** RSPs will receive consistent communication irrespective of access technology.

- **Proactive assurance:** As a result of proactive service performance monitoring being standardised across all access technologies, nbn® plans to use predictive tools to enable targeted proactive service assurance tasks to be performed on network elements without customers having lodged a service incident. This differs from proactive assurance initiatives being considered in the ECSD space as proactive assurance here applies to the entire network (e.g. transit and local area network) and is not focused solely on the individual service of an end user.

- **Improved fulfilment and assurance timeframes:** Delivery of a centralised nbn® fulfillment system, supported by standardised processes to improve overall order cycle-times and to enable early identification and efficient resolution of order fallout and service issues.

FY25 Planned Timeframes

Over the next few years, nbn® plans to transition customer and network services business to the new solution through a staggered approach while minimising any risks to the business, customers, its people, delivery partners and RSPs.

Building the business capability plans to occur throughout FY25 to FY27 with the planned service benefits progressively being realised as the program is implemented.

In FY25, nbn® plans to start consolidating and migrating the assurance and customer resolution services to the new solution. This will be done maintaining business continuity by ensuring there is resilience in the current solution to avoid any impacts to customers

BUSINESS OPERATIONS

Program Summary

This program of work ran throughout the FY24 year with some works planned to continue in FY25. It is centred around the delivery of high priority customer impacting capabilities to improve operational efficiency and customer experience across some targeted areas of the network and operating environment.

FY24 Review

Key benefits delivered in FY24 under this program include:

- **FTTC Optimisation:** The outcomes from this program included speed and stability improvements for FTTC end users.

  — Optimised VDSL2 parameters across all FTTC DPUs (~440k) to improve copper line performance;

  — Achieved an average speed uplift of 8.7 Mbps resulting in an additional ~47k services subsequently able to achieve 100 Mbps; and

  — Data speed improvements of up to 23 Mbps observed in apartment buildings or similar structures where multiple vendors are working together to deploy the network.

- **Introduced a higher transmit power into the FTTP network:** Prior to the publication of ASIP-24, nbn® undertook a controlled trial in relation to higher transmit power on FTTP Optical Line Terminal (**OLT**) devices that demonstrated a greater receive sensitivity for Optical Network Termination (**ONT**) devices allowing these to work at greater distances from a Fibre Aggregation Node (**FAN**) site. Higher transmit power on OLT devices is achieved via the installation of a more powerful small form pluggable (**SFP**) optic and helps resolve performance issues on ONT devices where signal levels are below the optimum threshold.

  — In FY24, nbn® has activated this capability with all new build and Fibre Connect activities now supported by the more powerful SFP. Approximately 20k were deployed in the network in FY24.

  — In FY25, nbn® will continue deploying more powerful SFPs to boost current performance as well as enable future connectivity over XGS-PON (10 Gigabit Symmetrical PON).

- **Increased the power in the HFC network:** This supports service stability in areas where nbn® sees performance issues, resulting in a better experience for HFC end users. The introduction of 60V provides a longer reach, increased power headroom (~25%) and operates more efficiently (~4.5%) than 48V operation, with associated customer experience gains (i.e. improved speed and stability). In FY24, ≈350 amps had their power supply upgraded from 48V operation to 60V. These upgrades occurred under our HFC plant modernisation program.

- **Uplifting the sandpit environment:** These changes went live at both our Melbourne and Sydney environments in Q4 FY24. The anticipated benefits of this program include:

  — a reduction in lead times for RSPs to take up new products (reducing user acceptance testing timeframes, allowing RSPs to sell and bring in revenue from new products up to six months earlier than would otherwise be the case);

  — simplification of the onboarding process for RSPs for new products, product changes and migration/network grooming;

  — sandpit testing to be in alignment with nbn® production network removing re-work and eliminating defects in pre-production environment; and

  — adding in nbn® capability to execute regression testing on new firmware, software, customer premises equipment (CPE), hardware in a controlled environment across all technologies.
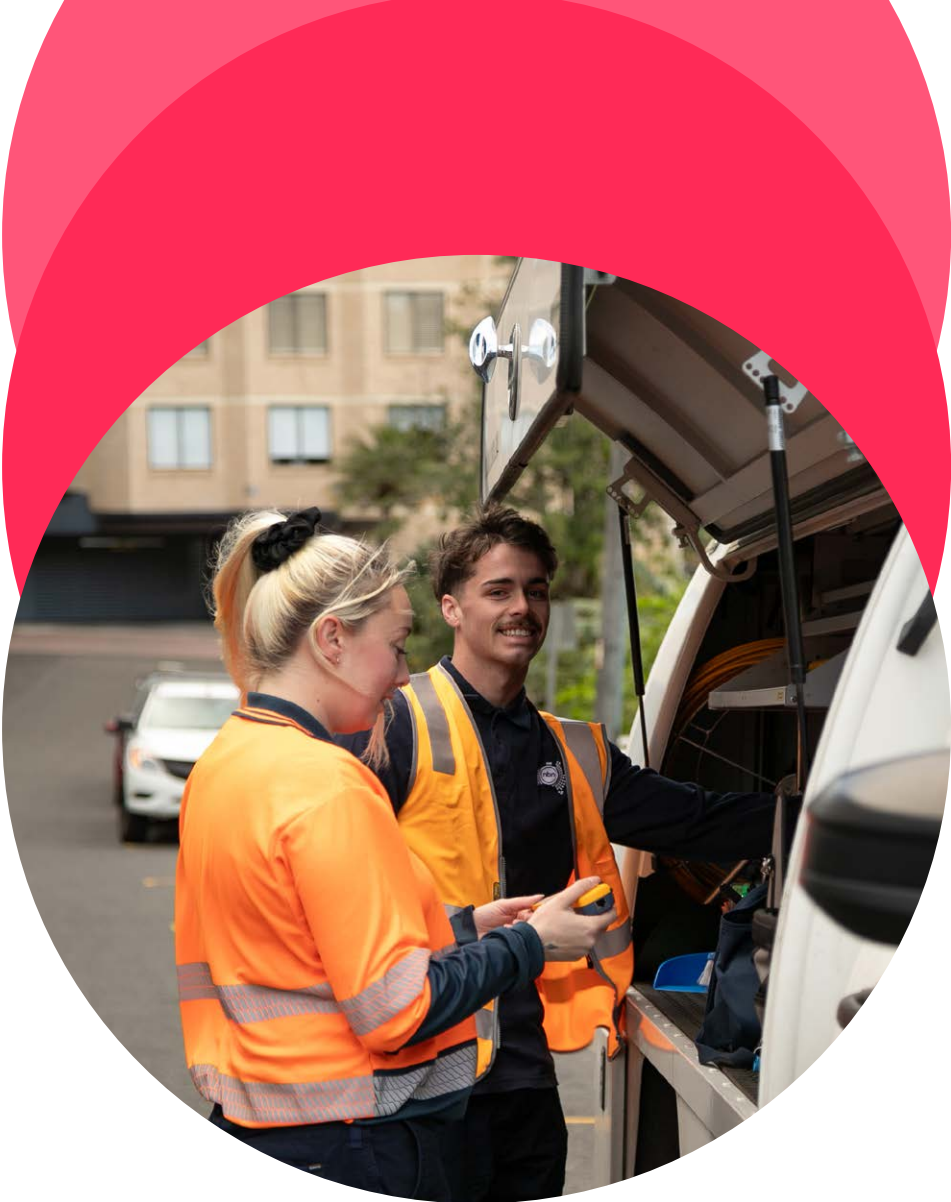
Planned service benefits and timelines for FY25

The key service benefits planned for FY25 include:

- The continuation of **introducing a higher transmit power into the FTTP network** with nbn® forecasting to continue to deploy a superior class of small form pluggable optic on the OLT at ~15k locations in FY25.

- **The continuation of introduction'silent failure detection on HFC and OLT network:** The initial pilot on the anomaly detection functionality on limited sites provided more insights on its applicability across nbn's network. Work is in progress to expand the pilot for the 2 use cases across all sites and introduce new use cases.

- Commencement of the **RSP system resilience program** seeks to ensure that RSPs can interact with nbn® via systems which are operating at the level of performance which RSPs expect. This initiative will deliver changes via a series of quick wins and more significant architectural re-designs to ensure the stability and performance of the nbn® systems is kept at a sufficiently elevated level and the trust and partnership with our RSPs is maintained.

nbn® expects that through these changes RSPs will have more stable assurance, connection and reporting capabilities at their disposal – leading to reduced incidents being raised in relation to supporting systems.

INTERNAL FIELD WORKFORCE EXPANSION

Program Summary

The expansion of nbn's internal field workforce is centred around developing a sustainable internal field services workforce with a focus on regional Australia and diversity of the workforce in line with best practice from global leaders in the industry.

Concluding in FY24 the aim was to see nbn's ability to meet demand for services and products become more diverse and flexible which in turn will improve our ability to manage seasonal and workload variability.

FY24 Review

In FY24, nbn® expanded its internal field workforce by 264 roles. This increase saw a re-balancing exercise of the external workforce through close consultation with Service Delivery Partners with approximately 23% of all service activities now being completed internally. As the benefits from the truck roll reduction programs are realised, and FTTP/Fixed Wireless upgrade programs reach maturity, it is expected that the volume of service activities completed internally will be approximately 33% by FY27.

nbn® has established a new Quality Centre of Excellence function. This introduces a new Quality Framework and Management system. Through improved definition of prescribed standards for service activities and investigating the potential application of contemporary technologies such as AI to review and monitor work practices, nbn® is anticipating an improvement in network and service resiliency to meet customer expectations.

As a result of the increase in the internal workforce in regional areas, nbn® increased the local nbn® workforce from 80 roles servicing regional locations in 2022 to 417 by the end of FY24, meeting the objectives of the Field Evolution FY24. This has resulted in greater community engagement, reduced lead times and a higher quality of service (and associated reduction in repeat truck rolls).

nbn® will continue to monitor this program closely and in the regions where the expansion occurs nbn® is expecting to see the following ongoing service outcomes for RSPs and end users:

- Faster service provisioning and restoration times;
- Reduced repeat visits;
- Reduction in failed installations; and
- Greater reliability of services provided.
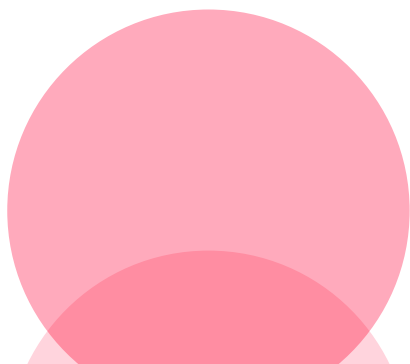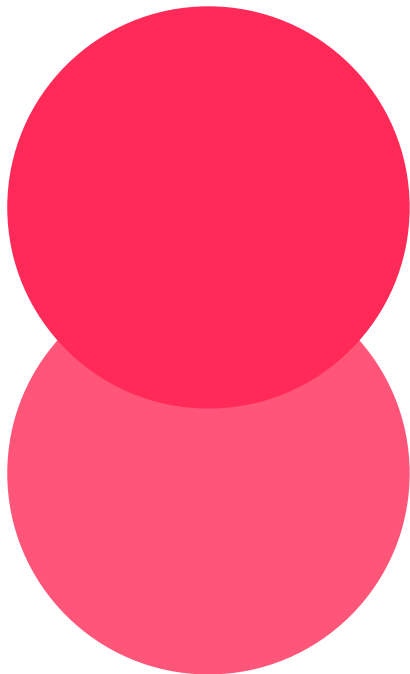
APPENDIX A: INDUSTRY CONSULTATION

Process for Evaluating Access Seeker Feedback

Before publishing ASIP-25, nbn® was required to consult with Access Seekers on:

- the initiatives in ASIP-24; and
- areas of service experience and potential initiatives that should be considered by nbn® in developing ASIP-25.

nbn® consulted with Access Seekers on these matters in November – December 2023. nbn® was very interested in proposals which would see industry and nbn® working together collaboratively to achieve improved service-related outcomes for end users.

Once the feedback was received, nbn® categorised the feedback into the following groups:

1. **Access Seeker feedback on potential initiatives** that Access Seekers think should be considered by nbn® in developing the next ASIP;
2. **Access Seeker feedback on areas of service experience** of end users and Access Seekers that the Access Seeker thinks should be considered by nbn® in developing the next ASIP;
3. **Access Seeker feedback on initiatives** that nbn® has started undertaking (or plans to start undertaking) in FY24 as part of our existing ASIP-24; and
4. **Other feedback which does not fall under the groups above**.

nbn® then considered this feedback and proposed initiatives, including by reference to the criteria described in the SAU where appropriate (see further below). In doing so, nbn® worked collaboratively with Access Seekers to better understand and align on the opportunities for service improvements, and explored and evaluated possible solutions, impacts and benefits.

As set out in the first table below, in respect of the initiatives proposed by Access Seekers nbn® has:

a. stated whether nbn® will either adopt the proposal, partially adopt the proposal, defer the proposal for future consideration or not proceed with the proposal; and

b. included a summary explanation to support its decision, including by identifying the main SAU criteria taken into account (where relevant).

In addition, in respect of feedback provided in relation to groups 2 to 4 above, nbn® has stated how that feedback was considered.

A number of submissions to the ASIP process related to matters considered as part of the separate ASPR. Those submissions are summarised below under category 4. On receiving those submissions, nbn® also took steps to clarify the purposes of the ASIP and ASPR. While these two processes are both focused on improving service outcomes for RSPs and end users, they are two separate processes deliberately designed to achieve improvements independently.

Evaluation Criteria

The SAU provides that nbn® will consider, and may weigh as it considers appropriate, such criteria as it determines appropriate in reviewing potential initiatives proposed by Access Seekers as part of the ASIP consultation. Those criteria may include the following:

i. whether the initiative is within nbn's permitted scope of activities;

ii. the anticipated benefits to End Users and/or Access Seekers that the initiative is planned to deliver;

iii. whether the initiative will make a meaningful impact operationally in a timely manner;

iv. whether the initiative is technically and operationally viable;

v. whether the anticipated operating and/or capital expenditure required to implement the initiative reasonably reflects the prudent and efficient expenditure that an operator in nbn's position would incur in achieving the Expenditure Objectives, having regard to the Expenditure Factors (as defined in the SAU);

vi. whether there are more prudent or efficient options that can deliver the desired outcomes; and

vii. whether nbn® proposes, or considers it will be required, to make a Cost-Pass Through Application in respect of the initiative in accordance with clause 2D.5 of the SAU.

Access Seeker feedback on potential initiatives that Access Seekers think should be considered by nbn® in developing the next ASIP

This table captures those initiatives that RSPs proposed in feedback, under category 1 as described above. Feedback related to categories 2 to 4 (described above) is set out in tables 2 to 4 below.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
Address mismatches or missing address data in the nbn® database is still prevalent and the process to access these errors or corrections needs to be better streamlined. Having to provide a POD or evidence is understandable, however the timeframe to address an update the nbn® systems can take weeks rather than days. This needs some attention focus to reduce delays, complaints, and escalations.	nbn® won't be progressing this proposal.	nbn® acknowledges the challenges around finding the correct address for customers or requesting updates if the premises have undergone changes. nbn® continues to work closely with developers and local governments, to ensure we have accurate and up-to-date address details, by regularly reviewing the existing nbn® footprint addresses against government address records. Further to this, in March 2024 we transitioned the original nbn® rollout reports to the new Location Data Model capability. This model will become nbn's single consolidated source of truth for location, address, boundary and serviceability data, improving our data quality framework. We expect the new model to reduce instances when a RSP needs to raise an enquiry to nbn® to resolve an addressing issue. Given the recent launch of the new model in March 2024, we will closely monitor address errors and identify opportunities for further improvements.	There are more prudent or efficient options that can deliver the desired outcomes.
Equally for any Service Class mismatch or changes due to a Port or new request and or migrations should be allowed to progress and be more manageable for the RSP. Especially when or if a new build is required, which may take several weeks. The end customer service should be able to be migrated on the original SC rather than left waiting for the change to enact.	nbn® won't be progressing this proposal.	In addition to the above response, we have published a serviceability guide in March 2024 to better enable RSPs on how to interpret the information in nbn's systems in relation to a premises serviceability, and steps that the RSP or customer can take in each scenario.	There are more prudent or efficient options that can deliver the desired outcomes.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
Thresholds for performance incidents and faults have a component that is based off drop count and whilst the count of drops is considered, the duration of the drop is not. Customers who exhibit long drops underneath the drop count threshold limit cannot raise a Performance Incident or Service Incident and as a result have an unreliable service that will not be rectified. **Proposed solution:** Drop threshold to be adjusted to also include the duration of the drop rather than just frequency.	Partially adopted.	nbn® now displays a measurement of Unavailable Time in Service Health Summary (which measures the time the network is unavailable because there isn't an active connection between the modem and the access node – generally aggregated over a period of at least 15 minutes). nbn provides a process for FTTN, HFC, and FTTC services whereby an RSP can submit a Dispute Trouble Ticket if the Unavailable Time is longer than 30 minutes today, yesterday or two days ago. nbn® believes that this functionality addresses the underlying proposal from the RSP. It is important to note that Unavailable Time does not measure the duration of specific dropouts but identifies the aggregated Unavailable Time for the measured period – which unavailable time could be due to reasons beyond a dropout (eg. customer disconnection of modem). nbn® is assessing the feasibility of implementing this for other technologies. As a result of providing a more efficient alternate solution which will address the underlying issue, nbn® won't be progressing with adjusting the threshold for performance incidents and faults to include duration of dropout as proposed.	There are more prudent or efficient options that can deliver the desired outcomes.

RSP proposal		nbn® response	Main criteria informing decision
Constant changes to the nbn® product set and nbn's marketing activities continue to drive considerable additional expenses for nbn® resellers on top of what is already a low margin business. The low margins that nbn® resellers experience do not support the ongoing investment required to be an effective retailer and this is not sustainable for the industry in the long term. Although nbn® offers some development funding, this typically only covers a limited amount of RSPs actual development costs for product and process modifications. **Proposed solution:** nbn® can further improve RSP experience by better understanding the costs its activities may drive into RSPs and increasing the development funding offered to RSPs when it pushes out major IT, operational or product changes. A revised ASIP should commit to nbn® fully understanding the costs incurred by RSPs that are a direct result of nbn's product changes and marketing activities. nbn® needs to provide additional development funding for large changes and allow sufficient lead-times for RSPs to roll out product and collateral changes before these come into effect as most RSPs are subject to minimum customer notification periods and systems development lead-times. When rolling out new programs and initiatives, nbn® also needs to consider that different RSPs across the industry have varying capex investment timelines as several RSPs work to a different financial year to nbn.	nbn® has not adopted the proposal to increase development funding to RSPs for major changes. nbn® has partially adopted the proposal that nbn® take steps to better understand RSP costs, in the way described in the next column.	This proposal is being addressed under ASIP-25 initiative 'Transform RSP Experience'. A key area of focus is on Partner Interaction Excellence – Changing the heart of how nbn® works with RSPs to drive clarity in what we are doing, when and how we deliver new products to RSPs. The primary objectives will be: • Enhanced Visibility of Future Plans: Provide clearer insights into upcoming initiatives and developments. • Reliability in Launch Delivery: Aligned with the dates communicated on the Product Roadmap. • Reduced Communication Volume: By streamlining communication, to minimize the burden on our partners. In FY25 we will be working towards making nbn® more planned, predictable, and efficient in delivering launches and communicating to RSPs. This will enhance the forward notice RSPs receive of upcoming product changes and marketing activities allowing adequate time to plan and prepare. Through the RSP Development Fund (RDF) and Marketing Development Fund (MDF), nbn® supports RSPs in investing for the implementation of new products, services, and process changes. The focus is on operational efficiency and cost-effectiveness across all nbn® offerings, in line with non-discrimination obligations. Additionally, nbn® aims to continually uplift system enhancements and capability with the aim to simplify and automate network management and operational tasks, reducing rework and delivery costs. nbn® will continue to invest in API development, providing RSPs with better visibility into nbn's product, service, process, and network information, streamlining customer service and eliminating manual processes. Overall, continuous improvements enhancing RSP and end-customer delivery experiences while minimizing costs.	There are more prudent or efficient options that can deliver the desired outcomes.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
Concern with volume of Right First-Time resolutions that have repeats in 7 days. This means that a subset of end users is not having their issue identified and resolved first time which requires re-engagement with RSPs and nbn. **Proposed solution:** 1. Extending the 7-day monitoring period for Performance Incidents to all service faults. 2. Allowing RSPs to raise repeat incidents without putting the customer through the same T&D processes. This has been successful for Performance Incidents and will have value if put in place for service faults	Deferred for future consideration.	Improving the quality of the service experience is a priority for nbn, and the proposed initiative warrants further assessment to determine the feasibility of extending the monitoring period for Performance Incidents to all service faults. Given the potential cost and operational impacts of extending Performance Incident monitoring and increasing incidents without supporting T&D information, it is important that these implications are properly understood before such an initiative could be adopted. Even undertaking this feasibility assessment will incur detailed analysis and cost - subject to further assessment this initiative may be considered as part of the ASIP for FY26. nbn® is driving continual improvements to performance by enhancing the test and diagnostics tools, insights provided in Service Health Summary, and incidents frameworks.	nbn® needs to further assess the proposal to determine: • the anticipated benefits to end users and/or Access Seekers that the initiative is planned to deliver; • whether the initiative will make a meaningful impact operationally in a timely manner; • whether the initiative is technically and operationally viable.
Challenges faced utilizing the current APIs (Service Qualification + Address Search) to successfully onboard new development customers prior to move in. **Proposed solution:** Optimize existing APIs to return LOCIDs or 'Ready for Sale' at an earlier date or look at alternate options to allow RSP to place a future order with nbn® if customer consents. Uplift RSP's ability to understand if new development request has been submitted to nbn.	Deferred for future consideration.	The proposed initiative to enable RSPs to place an order to nbn® for a future date was raised in the March 2024 'movers' workshops and has been added to the ongoing industry consultation for the movers program for further feedback. RSPs have shared mixed levels of interest to date, and as such the idea has not been prioritised for development at this stage, however we are open to assessing the idea if there are more RSPs that see value in it. nbn® may consider enabling RSPs to place an order for a future date as part of the ASIP for FY26.	nbn® needs to further assess the proposal to determine: • the anticipated benefits to end users and/or Access Seekers that the initiative is planned to deliver; • whether the initiative will make a meaningful impact operationally in a timely manner; • whether the initiative is technically and operationally viable.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
The number of locations that are now going through connect/disconnect/connect are increasing. Testing a service prior to order completion should be done in these instances, as end users that move out of premises may take nbn® connection boxes with them, or in-place infrastructure that has not been used for a period may now be faulty.	Partially adopted.	This proposal is being addressed under ASIP-25 initiative ECSD. We are investigating the option to adopt testing prior to service completion for additional connection scenarios. This was raised in the 'movers' workshops and we will be consulting with RSPs in H2 FY25 on how best to implement this. The consultation will work through a pathway for implementation targeted for FY25.	The anticipated benefits to end users and/or Access Seekers that the initiative is planned to deliver: • whether the initiative will make a meaningful impact operationally in a timely manner; • whether the initiative is technically and operationally viable.
Planned Changes require 10 business days lead time and there is an overuse of Emergency change, which often results in little or no notice to RSPs & a poor customer experience because having received no notice of an outage (or notice after the outage has begun) customers assume that there is a fault & contact their RSP. Expedited Change would allow for a reclassification without the need for the 10-day lead time or use of Emergency change. RSP's experience is that a significant proportion of planned outages do not meet the 10 business days' WBA SLA.	Deferred for future consideration.	Recognising that Planned Network Outages and outage change management pose challenges for both RSPs and nbn, the Planned Network Outage Industry Forum facilitated by Comms Alliance aimed to address these issues. While the forum achieved significant alignment on key items (e.g. Understanding where there are competing concerns of RSPs, establishment of industry principles, requirements for effective communication and IT systems) further work is required regarding potential changes to outages processes – including in relation to the proposed change for a new category of 'expedited' outages. nbn® is currently evaluating options to enhance planned outage and change processes, including the proposal for an expedited outage type. nbn® is plans to consult with industry throughout FY25 on potential changes for enhancing the outages and associated notification process.	nbn® needs to further assess the proposal to determine: • the anticipated benefits to end users and/or Access Seekers that the initiative is planned to deliver; • whether the initiative will make a meaningful impact operationally in a timely manner; • whether the initiative is technically and operationally viable.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
Whilst RSPs utilise tools available to them from nbn® for Test & Diagnostics, it can be difficult to explain to an end user why a service is considered within threshold or not. An example of this is speed faults for HFC or FW where nbn will only supply a Green/Amber/Red. **Proposed solution:** nbn® to provide a clear view of thresholds used for categorising faults and this made available to RSPs and updated in all relevant documentation and systems. Include sharing any additional T&D data that nbn® have available to allow RSPs to make more informed decisions.	Partially Adopted.	nbn® now shares service performance information with RSPs through the Service Health Summary. This tool classifies services based on performance and suggests optimal actions for efficient issue resolution. To drive continuous improvement, nbn® has refined insights and tools for determining service performance. We recommend RSPs use the Service Health Summary in real time and follow nbn's recommended next steps. Additional enhancements are planned for FY25 via the ECSD program of work outlined in the body of the ASIP25 report.	There are more prudent or efficient options that can deliver the desired outcomes operationally in a timely manner.
There are currently no clearly specified speed commitments for CIR on TC-2 and TC-1 Speed tiers or a Performance Objective. **Proposed solution:** SLA Commitments are also needed for Committed Information Rate (CIR) Services [TC-2 and TC-1]. There are currently no clearly specified speed commitments for CIR on TC-2 and TC-1 Speed tiers or a Performance Objective. With nbn's renewed focus on TC-2 as a business product, RSP recommends that nbn® considers introducing a CIR Objective as part of its ASIP. For a Committed Information Rate service RSP would expect that the service would meet the committed speeds 99% of the time throughout a day or week – not just to meet the committed speed once in every 24-hour period.	nbn® won't be progressing the proposal.	nbn® has engineered the network to ensure ordered CIR on TC-1 and TC-2 services is achieved. This includes provisioning bit rate overheads as well as assigning priority packets to ensure in the event of intermittent congestion CIR is maintained for TC-1 & TC-2. We also set a limit on how many TC2 services are allowed per PON to avoid oversubscription. The current WBA also sets standards on frame delay, frame variation and frame loss for each traffic class that the network is to achieve (refer Section 7 'Network Performance' of the Wholesale Broadband Agreement – Product Technical Specification – nbn® Ethernet Product). We remain focused on ensuring CIR is delivered. With no current ability to continuously measure bit rate across these services, implementing CIR objectives is not something we will be considering. nbn® will not progress with implementing specified speed Service Levels or Performance Objectives for CIR on TC-2 and TC-1.	The initiative is not technically and operationally viable.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
RSP believes that there are at least [C-i-C] premises remaining on legacy copper serviced within the Fixed Line footprint as a Location ID (LOC ID) has not been either created or matched. Included in this volume are an estimated [C-i-C] existing granny flat locations that cannot get nbn® services unless considered a separate address via local government. As a result, these dwellings with legacy internet services are unable to migrate/connect to the nbn® without additional cost. **Proposed solution:** Establish new streamlined processes and forum for LOC ID creation to close out the remaining copper legacy services within the Fixed Line Footprint and have them migrated to nbn. This would include allowing RSPs the ability to request nbn® create a new LOC ID for existing granny flat / retirement home locations that require a nbn® service that were active and missed during the original Fixed Line rollout.	nbn® won't be progressing the proposal.	nbn® won't progress the proposal because nbn® is providing customers with an alternative solution aimed at streamlining the process to connect granny flats or retirement villages. Where nbn® has received requests relating to granny flats or retirement villages, nbn® has implemented procedures specifically designed to facilitate connection to the nbn® network, via the primary NTD (with cabling the responsibility of the owner) or through an extended Wi-Fi connection. Relevant information can be found here: • Connecting unserviceable premises • Preparing for the nbn	There are more prudent or efficient options that can deliver the desired outcomes. The initiative is not technically and operationally viable.
Under the COAT program, when premises are flipped from Fixed Wireless to Fixed Line, copper disconnection is triggered. Many customers retain a copper voice PSTN service with their nbn® Fixed Wireless internet. Some customers in this COAT cohort previously had nbn® Fixed Wireless services however they abandoned them due to previous service quality and returned to copper legacy services. There are instances where the copper disconnection date has passed or occurs within weeks of the new fixed line technology being ready to connect. It is understood that this is an anomaly due to the impacted Location ID falling within a polygon of an existing rollout region. **Proposed solution:** Develop processes that ensure locations impacted by COAT Fixed Wireless to Fixed Line are given at least 12 months or aligned to the respective COAT Changeover Date to migrate any remaining legacy copper services before copper disconnection.	nbn® won't be progressing the proposal.	RSPs have been advised that at a minimum a Premises will receive 6 months' notice of copper disconnection. nbn® believes this is sufficient time to ensure a successful migration off copper, however we do recognise that in some instances the customer may not be able to migrate within the copper disconnection window. In these instances, there is an existing process for RSPs to seek an extension to the disconnection of the copper- based service on a case-by-case basis.	There are more prudent or efficient options that can deliver the desired outcomes. The initiative is not technically and operationally viable.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
Under the Fibre Connect Program, many locations are not currently forecast to be able to migrate to FTTP until at least mid-2025 and therefore those customers would see no service benefits or improvements under this proposed program during both ASIP-24 or ASIP-25. Also, under the Fibre Connect Program, nbn® only selectively offers the upgrade to fibre to customers who are willing to pay more for a high-speed plan. This means that many customers who can't afford or are not willing to pay for a higher nbn® speed tier will not be able to benefit from the switch from FTTN/FTTC to FTTP and will not see any service improvements. In its ASIP-25 nbn® should lower the speed tier requirement to 50/20 plan for customers to be eligible for the upgrade.	Partially adopted, deferred for future consideration.	nbn® has partially adopted the proposal, as communicated to RSPs on 27 March 2024 where changes relating to proactive upgrades, Fibre Connect rebates new marketing collateral and installation guidelines were shared with RSPs. Fibre Connect and fibre upgrades continue to be a key focus for nbn® and RSPs with significant updates to processes having been delivered this year. nbn® continues to review its upgrade program and will work collaboratively with RSPs to explore further opportunities to improve the effectiveness of the program. In relation to the broader feedback, nbn® is addressing this feedback under the ASIP-25 ECSD program as part of the Fibre Connect and assure journey. nbn® will continue to engage RSPs on such matters in FY25.	nbn® needs to further assess if the proposal to determine: • the anticipated benefits to end users and/or Access Seekers that the initiative is planned to deliver; • whether the initiative will make a meaningful impact operationally in a timely manner; • whether the initiative is technically and operationally viable.
Some customers on 50/20 plans are receiving speeds lower than what they paid for. They may get more than 25/5 Mbps, but not 50/20 Mbps. A Performance Incident can be lodged, however it may not fix the problem. **Proposed solution:** Streamline the COAT process. Also make service within a Fibre Connect footprint that don't achieve 50/20 Mbps eligible for a tech flip via COAT.	Deferred for future consideration.	nbn® is addressing this initiative under the ASIP-25 FTTN/FTTC to FTTP program and under the ASIP-25 ECSD program as part of the Fibre Connect and assure journey. nbn® communicated to RSPs the details of the proactive fibre upgrade program to RSPs on 27 March 2024 and will continue to engage RSPs throughout FY25.	nbn® needs to further assess if the proposal to determine: • the anticipated benefits to end users and/or Access Seekers that the initiative is planned to deliver; • whether the initiative will make a meaningful impact operationally in a timely manner; • whether the initiative is technically and operationally viable.

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
18 months to rectify a customer service network issue is too long and does not align to customer expectations whilst also giving a sub-par service for months. 4 proposals were made under this initiative, summarised as: 1. Review and provide updated response on existing network activity tickets 2. Updated process with regards to new network activity tickets 3. Reduce the 18 months 4. Improve reporting to RSPs of progress/status	Partially adopted Items 1, 2, & 4. nbn® won't be progressing item 3.	In relation to proposals 1, 2, and 4, nbn® is increasing its focus on addressing NAT orders and updates on the progress of these. However, it is important that investment in the network is prudent and efficient – and specifically that investment in copper remediation does not run counter to investment in expanding the fibre footprint. nbn® won't be progressing proposal 3 (reducing the 18 months period) – and instead is focusing on the best solution for addressing services based on their location and available technology. For any NAT tickets raised within the FTTP footprint, nbn® will ensure continuity of service and pay the rebate to the RSP. Once FTTP is made available at that address the NAT will be closed and the RSP can plan to have the end user migrated to the FTTP service. nbn® communicated to RSPs the details of the proactive fibre upgrade program on 27 March 2024 where changes relating to proactive upgrades, Fibre Connect rebates new marketing collateral and installation guidelines were shared with RSPs. Fibre Connect and fibre upgrades continue to be a key focus for nbn® and RSPs with significant updates to processes having been delivered this year. nbn® continues to review its upgrade program and will work collaboratively with RSPs to explore further opportunities to improve the effectiveness of the program. For those customers with a NAT outside the FTTP footprint, nbn® will address each NAT on a case-by-case basis.	The anticipated operating and/or capital expenditure required to implement the initiative does not reasonably reflect the prudent and efficient expenditure that an operator in nbn's position would incur in achieving the Expenditure Objectives, having regard to the Expenditure Factors (as defined in the SAU).

RSP proposal	nbn® action on proposal • adopted the proposal • partially adopted/being considered • deferred for consideration in a future ASIP • won't be progressing	nbn® response	Main criteria informing decision
New Service and Fibre Connect installations can have end user delay as an issue, this can equate to up to 5% of on the day failures. This could be due to customers requesting NTDs be installed in a difficult to reach location or there is no conduit for an nbn® technician to utilise for installation (generally older home will not have conduit in place). As a result, this causes an incomplete job and an additional requirement on the end user to get an electrician in to install conduit to the desired location. **Proposed solution:** Expand the scope of the nbn® technician to install the relevant conduit (within moderation) to the location required to allow the installation to proceed first time.	Deferred for future consideration.	Changes to customer premises activities for FTTP upgrades need to be considered carefully as it impacts the cost of completing installation activities and the customer experience. Along with the proposal to introduce new Network Termination Devices, nbn® will continue to work closely with RSPs and other industry stakeholders through FY25 to identify options for solving challenges regarding FTTP upgrades – which could include consideration of the proposal regarding nbn® installation of conduit.	nbn® needs to further assess if the proposal to determine: • the anticipated benefits to end users and/or Access Seekers that the initiative is planned to deliver; • whether the initiative will make a meaningful impact operationally in a timely manner; • whether the initiative is technically and operationally viable.

Access Seeker feedback on areas of service experience of end users and Access Seekers that should be considered by nbn® in developing ASIP-25

This table captures feedback on general areas of service experience, as opposed to a specific initiative, that RSPs have raised in feedback for consideration in development of ASIP-25.

Access Seeker feedback on areas of service experience	nbn® response
Impact of co-existence on Service Levels continues to be significant End-users whose lines are in areas still in co-existence face reduced line PIR Objectives as well as a lack of certainty as to when the co-existence will end. These end users can experience poor speeds without the prospect of nbn® addressing this issue. This impacts the end users' experience, their service quality, the potential activities they can do with their service and limits the ability of RSPs to offer higher speed tiers to these consumers. RSP notes provisions in the SAU Variation relating to lines (FTTN, FTTB and FTTC services) that may be experiencing co-existence e.g., clause 1A.4.4, Module 1, Schedule 1A; Dictionary definition 'PIR objective', did not provide any improvements or assurance above that in the existing WBA. That is, FTTN/B and C services affected by co-existence will continue to be subject to lower PIR objectives before a fault can be raised for line performance problems. These weak objectives can add delay to addressing line performance issues in the long term. That is, an end user's line could be achieving the PIR objective for lines in co-existence, but once co-existence ceases, fails to achieve the higher PIR Objective that otherwise applies. Only then can Faults / Performance Incidents be raised to address this line underperformance, which could then be subject to a further extended timeframe for Network Activity. In addition, there is a lack of certainty about when the co-existence period will cease. While we note nbn® has advised in its WBA Roadmap that its goal is for co-existence is Q3+ CY2024, this is not a firm commitment and does not provide any firm timescale when it will cease, end users affected by co-existence are subject to these weaker obligations (PIR objectives and Network Activity clauses) from nbn. RSP considers the current benchmark service standards and the current ASIP fail to address the issue of co-existence for customers and fail to provide certainty over when co-existence will cease to apply.	nbn® has and will address many premises in co-existence footprint under the FTTC/FTTN to FTTP program. This will allow these premises to be upgraded to FTTP and no longer impacted by co-existence. nbn® encourages RSPs to migrate these to FTTP as the program progresses. For the remaining 82k impacted active premises still in co-existence, the majority (99%) of services are meeting the PIR Objective. As a result, it wouldn't be prudent for nbn® to change the Service Levels or PIR Objective for services within the co-existence period. nbn® will continue to review the services impacted by co-existence and will continue to work with the relevant owners of the interfering services to remove the interfering services as quickly as possible.
Using the September quarter's ACCC measuring broadband report as a reference, as at the end of September 2023 4,343,667 of nbn's active connections across all RSPs were still delivered on copper-based technologies, being 49% of the total active connections. Therefore, during the ASIP review period around half of RSPs customers were not serviced by FTTP and could not benefit from this improvement. In the ASIP nbn® confirms that the targeted underperforming lines to be overbuilt in FY24 is only 53,000 locations. As part of the ASIP nbn® should also be including service improvements for customers who can't yet upgrade to FTTP by offering improved additional service benefits for customers who have no choice but to continue to be serviced by nbn's copper-based technologies (FTTN/B/C).	The continued increase in demand for higher speeds, together with enhanced network and service stability, underpin nbn's investment in expanding the fibre footprint. While nbn® is keen to ensure that all customers receive the best service possible irrespective of access technology, it is important that performance commitments are not set above the capability of the network such that it would drive unviable network remediation costs. nbn® will continue to consider the most appropriate path for offering improved services to customers not currently eligible for upgrades to FTTP as it develops ASIP-26 – and making the transition to FTTP an easier process where available.

Access Seeker feedback on initiatives that nbn® has started undertaking (or plans to start undertaking) in FY-25 this financial year as part of our existing ASIP-24.

Access Seeker Feedback on ASIP-24 Initiatives	nbn® response
Support for initiatives detailed in the ASIP-24 but concern that these initiatives, particularly those that relate to or will have significant impact on customer experience, are not being implemented fast enough. Many of the difficulties and complaints end-users have with the nbn® is due to the unreliability and faults that arise from copper cabling. Therefore, as has been posited by nbn, it is widely expected that this will be largely ameliorated with the replacement of copper with optical fibre cabling. Furthermore, this is expected to have flow-on effects, such as to the Benchmark Service Standards. To that end, we believe that roll-out of the fibre network should occur as fast as possible and prioritised to that end. However, as the upgrade to fibre cables is a staged process that is scheduled to take place into 2025, we believe that in the interim there should be prioritisation of initiatives that significantly improve customer experience. RSPs continue to support nbn's plan to migrate existing services and locations away from its copper-based network (FTTN/B/C) and onto fibre (FTTP) as an ongoing improvement to future service and we understand that nbn considers this activity to be one of the core pieces of its ASIP-24.	nbn® welcomes this support for the key initiatives outlined in ASIP-24. nbn® is aligned with the importance of delivering the benefits from these initiatives as soon as possible – including, for example, targeted focus on the roll-out of the fibre network and facilitating migrations onto the network so that customers can receive the benefits of fibre as soon as possible.
Benchmark Service Standards for the first regulatory cycle are insufficient for ensuring customer satisfaction. Therefore, we hope that these selected initiatives will be able to supplement the Benchmark Service Standards to improve service delivery and customer experience. We understand that some of the biggest complaints that RSPs receive relate to the Benchmark Service Standards, such as dropouts and missed appointments for fault rectification. Therefore, the selected initiatives, which we believe to be most relevant to customer experience and service delivery should be prioritised, and nbn® should work to deliver the benefits of these initiatives earlier than scheduled, wherever possible. For example, the Enhance Customer Service Delivery is scheduled to be implemented from H2 onwards.	nbn® is aligned with the importance of delivering the benefits from these initiatives as soon as possible. Where it is possible for improvements to be delivered sooner – particularly those that would have a material impact on RSP or end user experience – nbn® will investigate and pursue this where practical. It is important to note, however, the significant scale associated with key initiatives in the ASIP – several of which are multi-year programs and will necessarily deliver benefits on a staggered basis. The FW Upgrade program provides a useful example of where nbn® has sought to enable benefits as soon as possible for RSPs and end users. In February 2024, nbn® moved to flipping the access technology available from Satellite to Fixed Wireless once a 'site' within an 'upgrade area' had been completed, releasing more LOCs to market earlier. Prior to that time, nbn® had waited until all 'sites' within an 'upgrade area' had been completed before flipping the access technology.

RSP feedback on other matters

In consulting with Access Seekers as part of developing ASIP-25, nbn® received feedback on other matters (ie, matters which were not proposed initiatives or areas of service experience to be considered in developing ASIP-25, or initiatives in ASIP-24. nbn® notes that feedback below for completeness. The majority of this feedback referred to proposed changes to service level commitments – which is outside the scope of the ASIP and more appropriately considered under the separate ASPR process.

Access Seeker feedback on service level commitments	nbn® response
Service improvements should be delivered by introducing new service levels, new performance objectives, product improvements and process enhancements into the WBA, and the ASIP should deliver amendments to the existing service levels and performance objectives in the WBA. This commitment to improve any existing service levels in the WBA appears to be missing from nbn's first ASIP.	Changes to service level are outside the scope of the ASIP. The ASPR is the mechanism by which service level changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards. This feedback was reviewed in conjunction with the feedback from the ASPR, which was published on the nbn® website on 26 June 2024. Under the process outlined in Proposed Changes Section 5, Part 2 of the ASPR Report nbn® will work with RSPs to identify potential service standard amendments for consideration.
Concerns raised in relation to specific performance objectives and service levels: • The Performance Objectives and Service Levels specified in the WBA for end user Connections for FTTP in the WBA5 are no different to the FTTN/B/C. • The Performance Objectives and Service Levels specified in the WBA for end user Fault rectification for FTTP in the WBA5 are no different to the FTTN/B/C. • The conditions specified for FTTN Network Availability in the WBA are no different to the FTTN/B/C. • nbn® does not commit to any PIR Objective for FTTP services in the WBA. • nbn® does commit to any minimum level of dropouts for FTTP services in the WBA.	Changes to service levels are outside the scope of the ASIP. The ASPR is the mechanism by which service level changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards. This feedback was reviewed in conjunction with the feedback from the ASPR, which was published on the nbn® website on 26 June 2024. Under the process outlined in Proposed Changes Section 5, Part 2 of the ASPR Report nbn® will work with RSPs to identify potential service standard amendments for consideration.

Access Seeker feedback on service level commitments	nbn® response
nbn® PIR Objectives are not reasonable, and improvements are needed in the ASIP.	Changes to service levels are outside the scope of the ASIP. The ASPR is the mechanism by which service level changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards.
We continue to have concerns that many customers have no choice but to use the nbn® copper-based DSL network at their locations and have poor speed experiences. nbn's PIR objective of 25/5 is an incredibly low target service level which allows nbn® to continue to offer poor speeds to many customers with no offer of a rebate for low speeds and underperformance.	The continued increase in demand for higher speeds, together with enhanced network and service stability, underpin nbn's investment in expanding the fibre footprint. While nbn® is keen to ensure that all customers receive the best service possible irrespective of access technology, it is important that performance commitments are not set above the capability of the network such that it would drive unviable network remediation costs.
RSP is requesting nbn® to commit to improving its target objectives for copper-based service, introduce improved Speed Performance Objectives for higher speed services and introduce new objectives and commitments for FTTP and HFC Services as part of its revised ASIP and as a variation to WBA5.	nbn's PIR objective of 25/5 Mbps reflects the minimum performance expectation set out in the Statutory Infrastructure Provider (SIP) legislation. Where copper-based services are not meeting this level, and are within the footprint for a fibre upgrade, nbn® is progressively enabling orders to be placed without the need for a higher speed tier. Outside this footprint, nbn® has established performance incident processes in place to facilitate the delivery of a minimum 25/5 service to the end user.
	Under the ASIP-24 initiative FTTN/FTTC to FTTP Program, nbn® made ~50k services (which were not meeting the PIR Objective) eligible for a flip to fibre without the need to order a higher speed tier.
	In ASIP-25 ECSD program nbn® will be expanding the fibre footprint to allow for an additional ~40k services (which are currently not meeting the PIR Objective) to be eligible for a flip to fibre without the need to order a higher speed tier.
	Speed commitments relating to FTTP and HFC services may be further considered under the process outlined in Proposed Changes Section 5, Part 2 of the ASPR Report.

Access Seeker feedback on service level commitments	nbn® response
Concerns raised in relation to Corrective Action Plans (CAPs): • Corrective Action Plans are not defined or properly adhered to by nbn® and the process needs to be enhanced with stronger defined commitments in the WBA • Concern with consequences of nbn® missing Performance Objective other than following CAP process; • Concern with failure to mee performance objectives for both Accelerated Connections and Enhanced SLAs across all RSPs for 12 or more months; • Content of CAPs at times insufficient – CAPs require clear detail of cause and steps nbn® is taking to rectify the issue; • For each successive month that nbn® fails to meet a Performance Objective, RSP expects that nbn® will provide an updated monthly Corrective Action Plan as part of the Monthly Performance Report; • Enhanced rectification process should be instigated when performance objective missed for consecutive 6-month period; • Further definition of what constitutes a CAP required; • Concern where Fibre Connect forms part of CAP, particularly at locations where option to move to fibre is not available for several years or not planned to be available.	Changes to CAP terms are outside the scope of the ASIP. The ASPR is the mechanism by which corrective action plans changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards. This feedback was reviewed in conjunction with the feedback from the ASPR, which was published on the nbn® website on 26 June 2024. The steps outlined in Proposed Changes Section 5, Part 1 propose changes to the CAP processes which are intended to respond to the concerns raised with current CAP process.
Adjusting SLA measurement exemptions Concern raised regarding a change in the calculation of the Enhanced Fault Rectification Service Level and what this means for the accuracy of nbn's historical reported performance against the relevant Performance Objective. View that any significant change to the way nbn® measures service levels should be done via the PDF consultation process.	Changes to service level exemptions are outside the scope of the ASIP. The ASPR is the mechanism by which service level exemption changes will are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards. This feedback was reviewed in conjunction with the feedback from the ASPR published on the nbn® website on 26 June 2024. The process outlined in Proposed Changes Section 5, Part 2 of the ASPR Report will evaluate how exemptions are considered in any potential service standard changes.
Failed Connections should not be reported as Successful Connections Concerns that nbn® reports that it has met its Connection Service Level on Failed Connections thereby inflating the reported performance on the Connection SLA. nbn® should review this as part of its future ASIP and look to stop reporting Failed Connections as Successful Connections when measuring Service Levels. nbn® connection orders that have been confirmed as Failed Connections should be reported as SLA "Misses" not SLA "Met".	Changes to reporting are outside the scope of the ASIP. The ASPR is the mechanism by which reporting changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards. This feedback was reviewed in conjunction with the feedback from the ASPR published on the nbn® website on 26 June 2024. The steps outlined in Proposed Changes Section 5, Part 1 (c) describe the process improvement initiatives which seeks to address this concern.

Access Seeker feedback on service level commitments	nbn® response
Commitments to review & adjust Provisional SLA results before issuing a Final SLA Result Concerns that nbn® has a built a process to provide an automatic provisional Service Level result (as met or missed), followed by a Final / Confirmed Service Level Result (as met or missed), but it appears that the process to review and change provisional results in the final report is not currently being utilised by nbn. Request for nbn® to provide clarity on how this review will occur and what checks are applied to interim results before confirming these as final, and include this process as part of the WBA Operations Manual.	Changes to reporting are outside the scope of the ASIP. The ASPR is the mechanism by which reporting changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards. **nbn® needs to further assess this feedback.**
The Independent Audit Process of SLA Information Accuracy Concern regarding confidentiality of independent external audit of nbn's Service Level Measurement Tools. Unclear if this audit process is delivering any actual improvements to Service Level Measurement, and what actions nbn® is taking to make improvements to Service Level Measurement. As part of its ASIP, RSP is looking for nbn® to properly define the purposes of this audit, its full scope and outputs, how the results can be transparently shared with RSPs and input from RSPs.	nbn® considers the current audit processes are sufficient for identifying potential issues or required actions.
Reported SLA Performance needs to include Actual Performance, both with and without exemptions being applied. Concern that nbn's reported performance does not accurately reflect the actual experience of end users as many exemptions are applied to nbn's reported SLA results. RSP understands that nbn® wants to exempt itself - and may stop the clock on its measurement of service levels for matters that it considers are beyond its control. As these numerous exemptions are currently applied to nbn's Service Level Measurement, this means that the reported SLA Performance results do not give a true indication of the volume of delayed transactions and the actual the timeframes that end users experience for Fault Restoration, Connection and Missed Appointments (as the excluded events mean that many delayed cases are reported as SLA met). View that nbn® should be committing in a future ASIP to reporting its SLA Performance objectives for Connection, Fault Restorations and Missed appointments with and without exemptions being applied. nbn® should also consider as part of its ASIP, if some of the exempted events that are party within nbn's control to fix e.g., nbn® technicians fixing a cut to its fibre, should be broken out and reported separately to other exempted events that are not within nbn's control to fix e.g., nbn® waiting for the electricity network and power to be restored by the grid operator.	Changes to reporting exemptions are outside the scope of the ASIP. The ASPR is the mechanism by which reporting changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards. This feedback was reviewed in conjunction with the feedback from the ASPR published on the nbn® website on 26 June 2024. This measurement concern may be considered further under the process outlined in Proposed Changes Section 5, Part 2 of the ASPR Report. However, it should be noted that RSPs are provided with detailed stop-the-clock reporting for all connection and assurance activities. This reporting provides significant transparency of not only the time nbn® took to complete activities excluding service levels, but also the time that tickets are impacted by stop the clock events.

Access Seeker feedback on service level commitments	nbn® response
Where a Mass Service Disruption occurs e.g., a Cyclone in Queensland, and nbn® choses to call a Force Majeure Event, it exempts itself from meeting service levels and from paying SLA rebates on a broad scale. nbn® can also exempt itself from meeting service levels and from paying SLA rebates for extreme weather events on a case-by-case basis by stopping the clock without calling an FME. Concern regarding clarity of when nbn® will call an FME or not. View that nbn® needs to review this process as part of the ASIP and set clearly defined criteria in the WBA as to what constitutes a FME event and the assessment nbn® will use to call a FME. When nbn® reports its performance with and without exemptions being applied, reporting without exemptions should also include data on services excluded from the SLAs and rebates by an FME.	Changes to reporting exemptions are outside the scope of the ASIP. The ASPR is the mechanism by which reporting changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards.

This feedback was reviewed in conjunction with the feedback from the ASPR published on the nbn® website on 26 June 2024. The steps outlined in Proposed Changes Section 5, Part 2 of the ASPR Report will evaluate how exemptions are considered in any potential service standard changes. |
| nbn® claims that one of the service benefits of FTTP is that these services have better speed performance, while this may be the case there is no clear service level commitment in the WBA (or any specified measurement in the WBA or the ASIP) that a FTTP service will deliver improved speeds. The WBA contains a specified PIR Objective service level for copper-based services (and a rebate if these SLAs are missed) but there is no specified PIR Objective for FTTP services and no rebate if the expected speeds are not met.

nbn® has indicated in the ASIP-24 that "the FTTP network enables end users to encounter a higher consistency of service and user experience", "less fluctuation than that experienced over copper lines" and "an FTTP network brings significantly improved network reliability" but there is nothing in the WBA5 Service Levels Schedule that commits to any of these statements or defines the minimum service levels for each of these items. nbn® can easily introduce improvements that are beneficial to customers and RSPs in the WBA5 Service Levels at any time with relatively short notice, there is no need to wait until WBA6 for such changes and RSP would recommend such improvements be introduced soon as part of the ASIP process. | Changes to service levels are outside the scope of the ASIP. The ASPR is the mechanism by which service level changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards.

This feedback was reviewed in conjunction with the feedback from the ASPR published on the nbn® website on 26 June 2024. The potential for FTTP specific speed commitments can be further considered under the process outlined in Proposed Changes Section 5, Part 2 of the ASPR Report. |
| FTTP upgrade installations should be consistent with FTTP install timeframes there should be no difference to the committed connection lead time for a new service.

If FTTP delivers better service levels as nbn® is indicating in its marketing, then as part of its ASIP nbn® should amend to WBA to commit to this. | Changes to service levels are outside the scope of the ASIP. The ASPR is the mechanism by which service level changes are appropriately considered, as this provides a view of the network and nbn's operations to meet service standards as well as insight as to the effectiveness and appropriateness of current service standards.

This feedback was reviewed in conjunction with the feedback from the ASPR published on the nbn® website on 26 June 2024. The potential for FTTP specific speed commitments can be further considered under the process outlined in Proposed Changes Section 5, Part 2 of the ASPR Report. |

Access Seeker feedback on service level commitments	nbn® response
RSP has previously provided detailed feedback on possible improvements to nbn's service levels through both the SAU and the WBA5 consultations. The ASIP itself appears to be a non-binding plan that is not a clear contractual commitment to deliver service improvements and there are no clearly defined consequences if any of the improvements contained in the plan are not delivered.	While the ASIP and the ASPR processes are both focused on improving service outcomes for RSPs and end users, they are two separate processes deliberately designed to achieve improvements independently. Quite a number of submissions were related to the ASPR and these are set out in the above table. The specific purpose of the ASIP is to identify and define key initiatives to enhance the service experience of end users and access seekers that will involve material Capital Expenditure or Operating Expenditure and will commence or continue in the applicable Financial Year. The specific purpose of the ASPR is to conduct a review of Service Standards included in the SFAA. The review will describe nbn's performance, identify and explain any material differences in nbn's performance, evaluate the relevance and effectiveness of the Service Standards, assess how initiatives from previous ASIPs have contributed to changes in nbn's performance in respect of service levels and service performance objectives and make recommendations or proposals to change the Service Standards or operating processes.