

Systemic Insight:

Loss of telephone numbers during migration to the NBN

Our role in providing systemic insights

The Telecommunications Industry Ombudsman's systemic investigation power allows us to identify telecommunications industry practices and issues, particularly those that are widespread, that may cause detriment to residential consumers and small businesses. By raising awareness of issues and recommending changes, the Telecommunications Industry Ombudsman drives improvements in the delivery of telecommunications services and better outcomes for consumers and the telecommunications industry.

Last year the Telecommunications Industry Ombudsman received more than 200,000 contacts from residential consumers and small businesses. As a high volume complaint resolution service, the Telecommunications Industry Ombudsman is well placed to identify and report on systemic issues residential consumers and small businesses face with their phone and internet services.

The Telecommunications Industry Ombudsman is committed to providing systemic insights to improve industry practices and reduce consumer complaints. These Systemic Insight reports are intended to raise awareness of industry-wide issues and publish recommendations for action.

Purpose of this report

This report shares the Telecommunications Industry Ombudsman's findings and recommendations on potential telephone number loss issues experienced by residential consumers and small businesses during migration to the National Broadband Network (NBN).

Findings

The Telecommunications Industry Ombudsman has seen examples of the loss of fixed line telephone numbers during migration to the NBN. These can be caused by both consumer action or inaction, and provider error. While number loss does not occur frequently, losing a telephone number has the potential to cause significant detriment to those residential consumers and small businesses relying predominately on fixed line phone services.



Recommendations

The Telecommunications Industry Ombudsman has four recommendations for telecommunications retail service providers to reduce the incidence and impact of the loss of a telephone number during migration to the NBN:

1. Retail service providers should amend the NBN customer order process to prevent number loss by:
 - a. Requiring consumers to opt-out of keeping their existing fixed line telephone numbers (including any fax number) after NBN migration, rather than opt-in
 - b. If the consumer has not opted out, requiring the consumer to provide the current 10 digit telephone number they wish to retain before the NBN service order can progress
 - c. Providing clear advice for a consumer to keep their current landline service active until the new NBN service is connected, including providing a warning that the consumer will lose their telephone number if they request a disconnection prematurely
2. To reduce confusion and to promote action by consumers, retail service providers should ensure their advice to consumers about a particular location's existing network switch off date is accurate and consistent with nbn co's advice.
3. Before disconnecting an existing fixed line phone service as part of migration to the NBN, retail service providers should have procedures in place to confirm that the consumer has an active NBN connection
4. Retail service providers should enhance communication pathways between each other to:
 - a. reduce the incidence of the loss of telephone number during the number transfer process
 - b. facilitate the retrieval of disconnected numbers

Background

Residential consumers and small businesses expect to retain their existing telephone numbers when moving between providers or to the NBN. However, some are not aware that their fixed line service is affected when migrating to the NBN, and that they need to take action to ensure they retain their existing telephone number.

Residential consumers and small businesses may also not be aware that when a service is disconnected, the existing number cannot be transferred, and that they can lose their right to the number.¹

The Telecommunications Industry Ombudsman has seen examples of the loss of fixed line telephone numbers during migration to the NBN. While such loss does not occur frequently, number loss has the potential to cause significant detriment to those residential consumers and small businesses who rely predominately on fixed line phone services.

In October 2017, after noticing a pattern of complaints about the issue, the Telecommunications Industry Ombudsman wrote to 23 retail providers of NBN services ('retail service providers') to better understand the circumstances behind the complaints and what providers believed to be the underlying causes. All providers surveyed had at least one complaint to the Ombudsman from a customer who had lost their number during migration. The Telecommunications Industry Ombudsman received responses from 20 of the 23 providers surveyed.

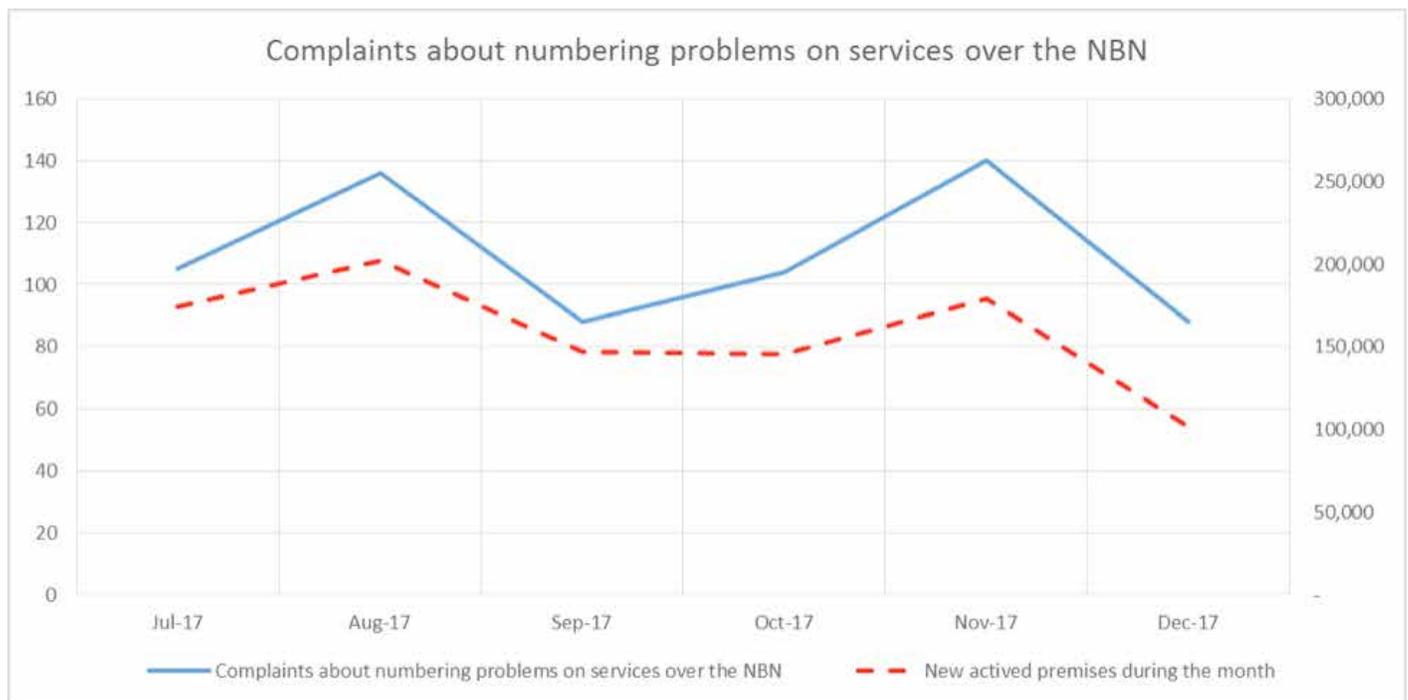
1. Complaints to the Telecommunications Industry Ombudsman on loss of a number when migrating to the NBN

Complaints to the Telecommunications Industry Ombudsman on loss of a number when migrating to the NBN

Between July and December 2017, the Telecommunications Industry Ombudsman received 661 complaints from residential consumers and small businesses about telephone number problems relating to services delivered over the NBN.

As shown in the graph below, the incidence of these complaints appears to correlate closely with the rate of the NBN rollout.

The complaints to the Telecommunications Industry Ombudsman are likely to represent a small proportion of residential consumers and small businesses affected by an issue. For services delivered over the NBN, the Telecommunications Industry Ombudsman believes it is important to highlight the issues because the impact on certain types of residential consumers and small businesses can be significant.



Common reasons for number loss identified by providers

While responses from providers varied, some common themes emerged. The providers surveyed acknowledged telephone numbers are sometimes lost, whether the residential consumer or small business seeks to change providers or stays with a provider when migrating to the NBN. The majority reported most lost numbers are ultimately retrieved.

Retrieval can take time and be disruptive for a residential consumer or small business. Sometimes the number can be permanently lost.

The Telecommunications Industry Ombudsman believes providers could reduce the incidence of telephone number loss by making the changes set out in the next section.

From the responses from providers, the Telecommunications Industry Ombudsman identified a total of six common reasons for telephone number loss – some from consumer action or inaction, and some from provider error.

Common reasons arising from consumer action or inaction

1. The residential consumer or small business does not apply to migrate to the NBN before the date the existing network is switched off
2. The residential consumer or small business provides incomplete or incorrect number transfer details when applying to migrate to the NBN, or does not specify the existing telephone number they want to keep
3. The residential consumer or small business cancels their existing service before the NBN connection is completed

Common reasons arising from provider error

1. Staff and system errors by providers
2. If the consumer is changing providers, the existing provider disconnects the service before the NBN connection is completed
3. Increased complexity of NBN connections requiring interaction with the existing copper network



Minimising loss of numbers from consumer action or inaction

Responses from providers pointed to three main circumstances in which actions by a residential consumer or small business may have caused the loss of their telephone number during or before the NBN migration process:

- The residential consumer or small business does not apply to migrate to the NBN before the date for switching off the existing network. The consumer's existing retail service provider and nbn co should have told the consumer in writing about the switch off date. If a consumer's existing phone service is disconnected as a result of the switch off date passing, the telephone number associated with that service is also disconnected. A number cannot be transferred while it is disconnected
- The residential consumer or small business provides incomplete or incorrect number transfer details when applying to migrate to the NBN (for example they do not specify the existing telephone number they want to keep), causing the number transfer attempt to fail
- The residential consumer or small business cancels their existing service before the NBN connection is completed. Residential consumers and small businesses are not always aware that they must keep their telephone number active with their existing service provider until their NBN connection and number transfer is completed. A telephone number must be active for it to be transferred across to the NBN

Improving the NBN service order process

Where a provider's NBN service order process is unclear for end users, it may contribute to the consumer errors described above.

Our review of a sample of online NBN service order forms found:

- There was great variation between each of the providers' order forms
- A number of order forms assumed the consumer would want a new telephone number rather than wanting to transfer an existing one. Forms often had a tick box option and some of them even had the new number option pre-selected
- One order form required a consumer to enter the number they wished to retain alongside their address at the start of the process for checking if NBN services were available at their address. If the consumer did not enter their number at this point the form did not provide another chance later on
- One order form did not appear to ask the consumer at any point about retaining an existing telephone number

Recommendation 1:

Retail service providers should amend the NBN customer order process to prevent number loss by:

- a. Requiring consumers to opt-out of keeping their existing fixed line telephone numbers (including any fax number) after NBN migration, rather than opt-in
- b. If the consumer has not opted out, requiring the consumer to provide the current 10 digit telephone number they wish to retain before the NBN service order can progress
- c. Providing clear advice for a consumer to keep their current landline service active until the new NBN service is connected, including providing a warning that the consumer will lose their telephone number if they request a disconnection prematurely

Improving accuracy of advice to consumers about network switch off dates

Providers identified that loss of a telephone number during migration can result from residential consumers and small businesses not taking steps to migrate to the NBN before the switch off date for their existing network.

The complaints received by the Telecommunications Industry Ombudsman reflect this issue. Some residential consumers and small businesses identify that delays can arise from different switch-off dates provided to them by their existing provider and nbn co. This is particularly the case where the time period between NBN becoming available and the existing network being switched off is less than 18 months.



Case study 1

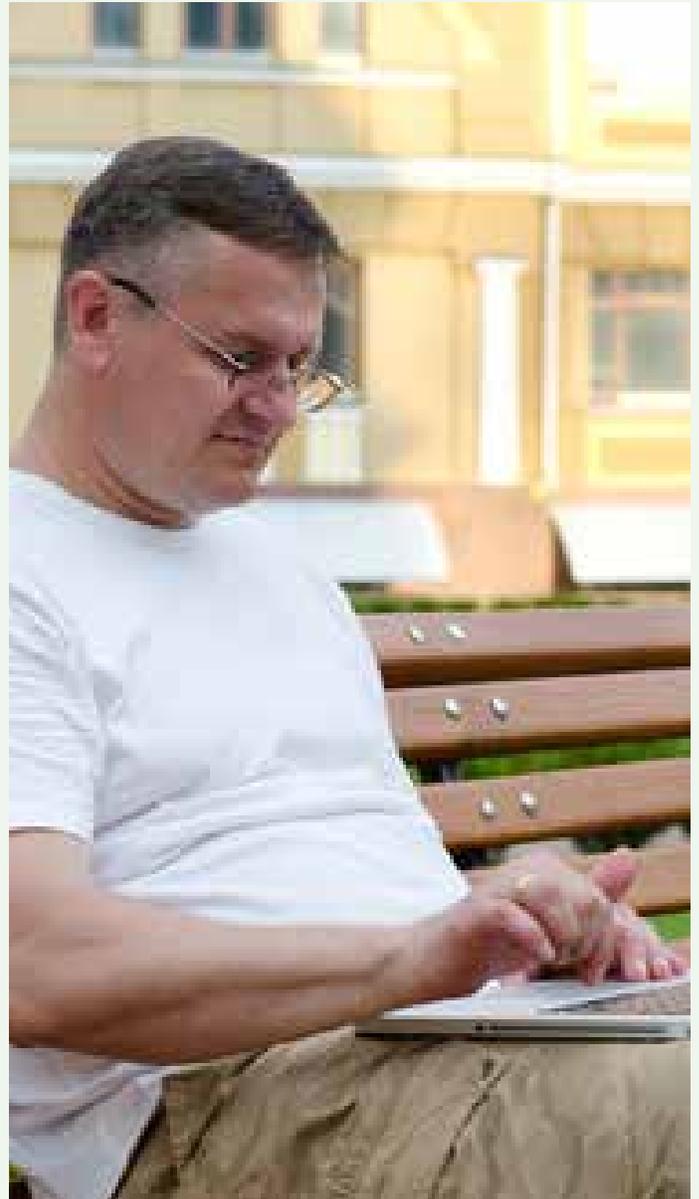
Inconsistent advice about network switch off date

Mr White* did not apply to migrate his fixed phone line and internet services onto the NBN before his existing network switch off date, resulting in his services being disconnected. Mr White told the Telecommunications Industry Ombudsman he had received inconsistent advice about the switch off date from his existing provider AAA Telco*, nbn co's website and the NBN rollout schedule.

Mr White subsequently decided to sign up for services on the NBN with a new provider BBB Telco*. He contacted AAA Telco to request his telephone number be moved to BBB Telco, but was told his number was disconnected and in quarantine. Mr White had held this telephone number for years and was anxious to get it back.

During conciliation of the complaint, AAA Telco told Mr White it had reconnected the number so it could be moved to BBB Telco. However, BBB Telco was still unable to move Mr White's number. Through the conciliation process, the Ombudsman's office found the number had actually been reconnected with the donor carrier, so AAA Telco had to first recall the number from the donor carrier before BBB Telco was able to move the number across. The complaint was successfully resolved with Mr White getting his number back.

*Name of individuals, organisations and companies have been changed



Recommendation 2:

To reduce confusion and to promote action by consumers, retail service providers should ensure all advice to consumers about a particular location's existing network switch off date is accurate and consistent with nbn co's advice.

Minimising the loss of numbers from provider errors

Providers identified three circumstances in which provider errors cause the loss of a telephone number:

- Internal staff and system errors by existing or new service provider
- Disconnection by existing service provider before the NBN connection is completed
- Increased complexity where the NBN technology requires interaction with the existing copper network

Reducing staff and system errors

In their responses, providers gave little detail as to what types of errors occur. However the responses did suggest internal system and staff errors and changes to upstream processes can contribute to delays in transferring numbers.

The Telecommunications Industry Ombudsman expects providers to pursue any continuous improvement opportunities providers identify. This includes system fixes, procedure changes and staff training to reduce the incidence of errors.

Case study 2 Provider release of number error

Mrs James* had a landline and internet service with AAA Telco*. After NBN became available in her area, Mrs James decided to migrate her services onto the NBN with a new provider BBB Telco.*

After her NBN services were connected, Mrs James discovered her phone line was not working. She contacted BBB Telco which gave her a temporary number. Mrs James told the Telecommunications Industry Ombudsman she contacted both providers, who blamed each other for the delay in moving her number across.

During conciliation of this complaint, BBB Telco investigated the matter and confirmed the reason the transfer request did not initially go through was due to an error with the release of the number by AAA Telco. This prevented BBB Telco from bringing the number across. BBB Telco resolved the complaint by successfully transferring Mrs James' number.

*Name of individuals, organisations and companies have been changed

Case study 3 Provider disconnection of number error

Mr Gray* chose to stay with AAA Telco* when migrating his internet and landline services to the NBN.

After connection to the NBN took place, Mr Gray noticed his fixed line phone service had been allocated a new number instead of his existing number. Mr Gray contacted AAA Telco and was told his old number had been disconnected and he would have to now use the new number.

After Mr Gray's complaint was referred by the Telecommunications Industry Ombudsman, AAA Telco contacted Mr Gray saying it would look into reconnecting his original number. At conciliation, AAA Telco said its records showed the number had returned to the original donor carrier's numbering pool. About four months after Mr Gray lost his telephone number, AAA Telco offered to investigate the issue or release Mr Gray from his contract at no cost. Mr Gray chose to accept release of contract as resolution to his complaint.

*Name of individuals, organisations and companies have been changed

Preventing premature disconnections

A significant number of providers surveyed told us telephone numbers had been lost when the consumer changes to a new provider when migrating to the NBN. In some cases, service providers appear to disconnect the existing service before the number transfer is finalised. However, all those providers surveyed also told us they would not prematurely disconnect a service when they are the provider from which the customer is switching.

The Telecommunications Industry Ombudsman considers that introducing additional checks into the disconnection procedure should provide a safeguard for consumers who ask to cancel their existing service prematurely. Losing service providers should also have processes in place to ensure they do not disconnect an outgoing customer's service until there is an active NBN connection.

Recommendation 3:

Before disconnecting an existing fixed line phone service as part of migration to the NBN, retail service providers should have procedures in place to confirm that the consumer has an active NBN connection.

Improving communication between providers

The Telecommunications Industry Ombudsman's research highlighted the need for better communication between providers for transition to the NBN and retrieval of numbers in the event numbers are lost.

This is particularly critical to overcome increased complexity where the NBN technology requires interaction with the existing copper network. Just over half of the providers surveyed perceived loss of telephone number was more prevalent in these types of connections. The practical effect of nbn co's technicians connecting fibre to a copper line is that the existing copper service needs to be physically disconnected. Providers told us it is difficult in these cases to accurately time the transferral of a phone number so it aligns with the transition of a service to the new NBN technology.

For some customers transitioning to fibre to the node or fibre to the basement technologies, there may also be a misalignment of their phone number details between the existing copper network and NBN systems. This can prevent a transition order from being processed successfully.

Where provider error has led to phone numbers being disconnected, retrieval of the number from quarantine can be a complicated process involving many parties (the consumer's old service provider, new service provider, any upstream providers and the original donor carrier of the number).

The Telecommunications Industry Ombudsman considers complications could be prevented through better communication between providers.

Recommendation 4:

Retail service providers should enhance communication pathways between each other to:

- a. reduce the incidence of the loss of telephone numbers during the number transfer process
- b. facilitate the retrieval of disconnected numbers

Risk of losing a telephone number

The diagram below shows the points at which residential consumers or small businesses (collectively referred to as the consumer) risk losing their existing number during the migration to the NBN.



The Telecommunications Industry Ombudsman

The Telecommunications Industry Ombudsman provides a free and independent dispute resolution service for residential consumers and small businesses who have an unresolved complaint about their phone or internet service in Australia.

ABOUT

The Telecommunications Industry Ombudsman Ltd was established in 1993, and is a company limited by guarantee. The Telecommunications (Consumer Protection and Service Standards) Act 1999 requires telecommunications providers to be members of the Telecommunications Industry Ombudsman and to comply with the decisions of the Ombudsman.

TELECOMMUNICATIONS SERVICE PROVIDERS

Telecommunications service providers are businesses or individuals who are carriers or provide carriage services.

Carriers – persons who own a telecommunications network unit to supply carriage services to the public. The carrier must be licensed through the Australian Communications and Media Authority.

Carriage service providers (CSP) – those who supply standard telephone services, public mobile telecommunications services, or carriage services that enable end-users to access the internet, including carriage service intermediaries who arrange for the supply of such services.

SCOPE OF SERVICE

Dispute resolution services include:

- Dealing with individual and systemic complaints.
- Promoting fair and effective resolution of complaints.
- Providing information and analysis to community, government and members.

THE TELECOMMUNICATIONS INDUSTRY SECTOR

The telecommunications industry regulators are the Australian Communications and Media Authority (ACMA) www.acma.gov.au and the Australian Competition and Consumer Commission (ACCC) www.accc.gov.au.

Government and the regulators set policy and regulations for the telecommunications sector.

Communications Alliance is the peak body for the Australian communications industry www.commsalliance.com.au.

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communications consumer organisation representing individuals, small businesses and not-for-profit groups as consumers of communications products and services www.accan.org.au.

How to make a complaint

1

Residential consumers and small businesses should first try to resolve their complaint with their phone or internet provider.

2

If the complaint remains unresolved, the residential consumer or small business can contact the Telecommunications Industry Ombudsman by visiting www.tio.com.au or calling 1800 062 058.

3

The Telecommunications Industry Ombudsman determines whether it can deal with the complaint.

4

The Telecommunications Industry Ombudsman works with the parties to resolve the complaint.

5

The Ombudsman has the power to decide the resolution of the complaint.

Contact us

By Phone	1800 062 058*
Online	www.tio.com.au
By fax	1800 630 614
By post	PO Box 276 Collins St West VIC 8007

If you need an interpreter, please contact us through the Translator and Interpreter Service (TIS): 131 450

The Telecommunications Industry Ombudsman's Privacy Policy explains how we collect, use and handle your personal information. Ask us for a copy or find it at <http://www.tio.com.au/privacy>

*Free from landlines. If you are calling from a mobile, you can ask us to call you back.