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Sent by email to: nbn@acc.gov.au
cc: Sean.Riordan@acc.gov.au and Scott.Harding@acc.gov.au

Dear Sean and Scott,

ACCC inquiry into NBN access pricing

I welcome the opportunity to inform the ACCC's inquiry into NBN access pricing.

The discussion paper focuses on the wholesale charges that access seekers pay to use the NBN to supply residential grade services, in particular, the price-related terms for the supply of a basic speed broadband access product on the NBN that is a functional equivalent of an ADSL/ADSL2+ and line rental bundle.

I encourage the ACCC to also consider the pricing needs of voice-only consumers who do not require internet services at all.

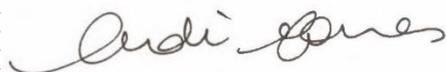
In our experience, voice-only consumers are a vulnerable class of consumers because they predominantly rely on voice services as their only point of contact. This includes the elderly and consumers who have medical alarms and priority assistance needs connected to their service.

The scope of the ACCC's inquiry is limited to pricing for the supply of Traffic Class 4 services described in the consultation paper as "standard, best efforts traffic class used for delivering residential and small business broadband services". The inquiry does not cover Traffic Class 1 services which are described as "highest priority, dedicated capacity traffic class, suitable for voice".

Unintended consequences may arise should Traffic Class 4 pricing be regulated but not Traffic Class 1 pricing, when Traffic Class 1 is the most suitable quality for a voice-only service.

It is possible price increases for Traffic Class 1 services may be passed onto consumers or providers may choose not to offer Traffic Class 1 services. Some voice-only consumers may not be able to afford a Traffic Class 1 service when they are required to migrate to the NBN, leaving them with a potentially unreliable or poor-quality voice service. This outcome would differ from the pre-NBN environment where all consumers had access to the same quality of voice service.

Yours sincerely



Judi Jones
Telecommunications Industry Ombudsman