



INTERNET ASSOCIATION OF AUSTRALIA
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By submission: <https://www.commsalliance.com.au/Documents/public-comment>

RE: Draft C647: NBN Access Transfer Industry Code

Thank you for the opportunity to express the Internet Association of Australia's (**IAA**) perspective on the Draft C647: NBN Access Transfer Industry Code (**Draft Code**).

IAA is a member-based association representing Australia's Internet community. Our membership is largely comprised of small to medium sized ISPs, many of whom are also RSPs. This response is primarily in representation of these members, as well as for the public good of the overall Internet industry.

We appreciate the efforts of the Working Group in the development of the code to minimise the number of services that have been incorrectly transferred and create a more efficient process.

On the whole, IAA supports the Draft Code and believe it could result in reducing the number of escalations and investigations of invalid service transfers which will benefit both consumers, and RSPs.

We understand that there will be costs to industry as the use of AVC IDs and the accompanying requirements will require RSPs to make changes to their systems and processes. In particular, we note that such costs will be felt more strongly by smaller RSPs with limited resources. We therefore appreciate the transition period to ensure RSPs are given enough time to implement these changes.

At this stage, we have not received extensive feedback from our members as to the reasonableness of the transition timeframes provided in the Draft Code. However, one member has advised that there is seemingly no issue with the proposed timeframes.

However, we do note that as NBN Co has not yet provided the necessary information to Access Seekers, it is possible that additional time will need to be provided in the case that this information is not provided with sufficient time for RSPs to implement the proposed changes.

We also bring attention to clause 5.6. We commend the inclusion of privacy concerns in the Draft Code. However, given the increase in data breaches in Australia, we recommend that a clause pertaining to the retention of personal information is included. In particular, where a customer is no longer a customer, the relevant party (RSP, Access Seeker, or NBN Co) should delete the personal information, subject to other laws regarding retention.

Once again, IAA appreciates the opportunity to contribute to the Draft C647: NBN Access Transfer Industry Code. We look forward to working with the Working Group, industry and other stakeholders for any further development and implementation of the Code to ensure an efficient transfer process.

ABOUT THE INTERNET ASSOCIATION OF AUSTRALIA

The Internet Association of Australia (IAA) is a member-based association representing the Internet community. Founded in 1995, as the Western Australian Internet Association (WAIA), the Association changed its name in early 2016 to better reflect our national membership and growth.

Our members comprise industry professionals, corporations, and affiliate organisations. IAA provides a range of services and resources for members and supports the development of the Internet industry both within Australia and internationally. Providing technical services as well as social and professional development events, IAA aims to provide services and resources that our members need.

IX-Australia is a service provided by the Internet Association of Australia to Corporate and Affiliate members. It is the longest running carrier neutral Internet Exchange in Australia. Spanning six states and territories, IAA operates over 30 points of presence and operates the New Zealand Internet Exchange on behalf of NZIX Inc in New Zealand.

IAA is also a licenced telecommunications carrier, and operates on a not-for-profit basis.

Yours faithfully,

Narelle Clark
Chief Executive Officer
Internet Association of Australia