QUALITY AND AVAILABILITY OF THE STANDARD TELEPHONE SERVICE

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INTRODUCTION

Australia’s elaborate legislative guarantees around fixed-line phone service availability are evidence of the historic social consensus that access to a phone is a universal right and an essential feature of an industrialised society. It would be unfortunate if the construction of a new access network in the form of the National Broadband Network (NBN), designed to enhance Australia’s technological prowess in the digital age, were to have the effect of reducing the quality or availability of the basic fixed-line phone service, which remains today the taken-for-granted service.

QUALITY OF TELEPHONY OVER THE NBN

The Standard Telephone Service (STS) is regarded by the community, if people think about it at all, as something that is always there. The bulk of residential and business users rely on it and will continue to do so for the foreseeable future.

Even for people who now rarely use a fixed-line telephone, it is considered an always available fall-back – a high quality, reliable and dependable service for when voice quality and drop-outs on mobiles get too irritating.

As the consumer peak body for communications, ACCAN (the Australian Consumer Communications Action Network) has not received any indication from NBN Co or service providers that the quality of the voice service over the NBN will differ from the quality of the voice service carried by copper. But people knowledgeable in the field have sufficient concerns to raise the need for end-to-end Quality of Service (QoS) standards for telephony over the NBN in industry forums, including this journal (Darling 2011; Gerrand & Horsley 2011).

One key observation about the end-user experience that has stuck in the mind of ACCAN advocates is that excessive delay by a matter of a few hundred milliseconds in the transmission of voice can cause a conversation to become psychologically uncomfortable and undermine natural communication between callers (Gerrand & Horsley 2011).

To date, there has been little by way of reassurance to the public that the voice quality of the telephone service will be maintained by retail service providers using the NBN, and industry seems to have given the issue a low priority. This is despite the social importance of good quality voice services. The low priority accorded the issue is surprising given the high profile it has been given in some parts of the media, usually accompanied by misinformation about the implications of the NBN for telephony.
It has not been unusual to hear on talkback radio a caller saying they don’t want the NBN to carry their phone calls because they don’t think voice quality is as good when “it is over the Internet”. No doubt this is said as the caller remembers their latest disappointing attempt to chat on Skype. (The NBN will of course be a managed network, and STS calls will not be “over the Internet.”)

Nevertheless, the NBN will allow service providers to provision their offerings to consumers in various new ways. Ensuring that the minimum quality of voice on an STS is not diminished and is the same across all service providers, no matter how cut-price they are, would make sense given the legislated scheme of consumer protections and guarantees built around the STS.

Of course, there may be some who argue voice quality should be allowed to differ – with the principle of ‘you get what you pay for’ applying to the quality of your voice service as it does with so many other consumer goods and services.

If this is the path we are taking with the NBN, it should only be done with an open public discussion first. We should not be sleepwalking into a scenario where those who pay for it get the type of quality they are used to on their fixed-line, while others get something less.

**AVAILABILITY CONSIDERATIONS REQUIRE OPT-OUT NBN INSTALLATION**

ACCAN’s position favouring an opt-out approach to NBN fibre installation arises from the starting point that the NBN is the replacement phone network. (ACCAN 2011a) ACCAN has of course been on the record arguing for broadband generally to be seen as a utility akin to water, energy and gas. However, arguments around the importance of broadband are secondary. Ensuring availability of a fixed-line phone service alone should be sufficient to convince governments that an opt-out approach to the rollout is the best policy.

The National Broadband Network (Tasmania) Act 2010 provides a laudable model for opt-out policy (Tasmania 2010). It strikes a prudent balance between allowing individuals the opportunity to opt-out if they so choose while at the same time ensuring that the NBN is a tool of social inclusion. Default policy settings in the NBN rollout will have a significant impact on the most vulnerable, including low-income consumers, tenants and older consumers. Sadly Tasmania’s opt-out legislation has not been replicated in other states and territories.

**NEW STATUTORY DEFINITION NEEDED FOR STS**

The statutory Standard Telephone Service is of course limited to voice telephony. Meanwhile, Telstra’s decisions and the Commonwealth’s Telecommunications (Equipment for the Disabled) Regulations (Commonwealth 1998) have excessively confined the STS in a way that allows for no consumer choice as to the form in which the STS should be delivered.

It is ACCAN’s view that a new statutory concept to replace the STS in terms of ‘network access’ or ‘connectivity’ should be created to legislatively support a universal service which allows for individuals to choose the services that meet their needs (ACCAN 2011b). The aim should be to deliver functional equivalence for telecommunications services, not necessarily limited to ‘voice’, in a converged environment.

The Australian Communications and Media Authority’s recent Numbering paper notes:

“the intent of the enabling legislation in regard to the STS was to define a basic communications service—indeed of delivery technology—to which a number of regulatory obligations and consumer safeguards relating to a minimum community standard of communications service are attached.” (ACMA 2011, 8)

Today, for many people, the ‘basic communications service’ is just as likely to be a mobile and safeguards which are attached to a service they do not use are of no comfort.
In a similar vein, Peter Darling (2011) has suggested a Basic Communication Service which comprises a bundle of services to meet a range of individual needs.

It is regrettable that under the government’s policy and its definitive agreements with Telstra, consideration of these substantial issues of what should comprise universal service has been deferred until close to the end of the NBN rollout.

REFERENCES


