Implementation of the National Broadband Network

Migration Assurance Policy
Consultation Paper

Tunstall Healthcare Submission

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1. Introduction

This submission is in reference to the Australian Government Department of Communications' Migration Assurance Policy Consultation Paper for the Implementation of the National Broadband Network (NBN).

The aim of this submission is to share experience on issues and provide recommendations for improving the migration of services to the NBN.

2. Background

Tunstall Healthcare is the world's leading provider of telehealthcare solutions, operating in over 50 countries and supporting more than 3.6 million people worldwide. Our unique range of telecare products unobtrusively monitor risks to safety in the home, enabling people to live independent lives with the knowledge that should an incident occur, help will be at hand.

Tunstall has played a significant role in the complex Australian health system since 2002, contributing to the health and wellbeing of over 70,000 people and their carers.

Tunstall is a leading provider of telecare and telehealth services including 24/7 emergency response services, remote vital sign monitoring, and video conference triaging services for people with chronic disease. Tunstall is also a founding member of Continua Health Alliance and an active leader in industry association PERSA (Personal Emergency Response Service Association).

Tunstall has consistently delivered pioneering telehealthcare solutions for more than 55 years, and remains at the forefront of transforming health and care services.

3. Tunstall's experience

Tunstall has been proactive in providing NBN migration and installation support to our clients, including:

- Enquiry call handling—providing clients with information regarding medical alarm compatibility over the NBN.

- Information updates regarding NBN migration included in regular communications to consumer and corporate clients, i.e. Department of Veterans Affairs, retirement village groups and community care organisations.

- Product testing to ensure compatibility and connectivity.

- NBN compatibility training and support information for corporate clients and sub-contract installers.

- Announcements of product compatibility to clients, corporate customers, healthcare professionals and general public.

- Updating client records to reflect NBN migration status.

- Proactive provisioning of de-identified medical alarm location data to NBN Co. as required.

- On-going follow-up with clients to ensure continuity of their medical alarm service once copper lines are disconnected in their area.

- Provisioning of NBN services for telehealth programs, where clients have an NBN Network Terminating Device (NTD) installed.

- Provisioning alternative communications such as ADSL2 or 4G wireless connections as an interim to delayed NBN service installations for telehealth programs where required.

4. Identified barriers to successful implementation

Through the NBN migration process, the identified barriers to successful implementation include:

- Lack of consumer awareness—limited education and awareness campaign, specifically for those with special telecommunications requirements, e.g. medical alarms.

- Limited industry engagement.

- Lack of consumer/industry incentives.

- Delays in NBN rollout.

- Delays in service provision to multi-tenancy sites.

4.1 Strategies to address barriers

4.1.1 Consumer awareness

Strategies to address issues with consumer awareness include:

- Public education and awareness campaign with a spokesperson who relates to and is trusted by 65+ Australians:
    - Example spokesperson: Ita Buttrose.
    - Mass media channels including morning and day-time television slots, national newspapers and radio stations.
    - Simple key messages similar to the 'Digital ready' campaign, such as 'Make the switch', or 'Get NBN ready'.
    - 'NBN ready' stickers to be placed on medical alarms when installing in homes.
- Set up an independent consumer hotline (1800 service) via a corporate call centre service for enquiries and advice relating to general connections, special service

requirements (e.g. medical alarms/security systems) and information on service options provided by Retail Service Providers (RSPs).

4.1.2 Industry engagement

Strategies to address limited industry engagement include:

- Conduct an Industry workshop to incentivise industry to support NBN growth.

- Attend industry events as a speaker, and/or co/exhibition booth.

- Provide market-ready campaign content for industry to redistribute to direct consumers.

Tunstall and other medical alarm service providers have recently been approached by NBN Co. to potentially supply personal contact details of clients within the DAD identified areas, which in our view is a breach of the Privacy Act. This has not been supported by Tunstall or, to our knowledge, other members of PERSA.

Tunstall is committed to supporting our clients directly with their NBN transition process. We appreciate that the request by NBN comes from a place of concern for users with medical alarms, however industry players such as ourselves are dedicated to ensuring our clients are safe and their privacy maintained.

Tunstall does support and has signed an agreement with NBN Co. to deliver de-identified information for the Medical Device Register.

4.1.3 Incentives

The NBN migration process can incur a number of out-of-pocket expenses for consumers and/or industry, such as batteries, in-home cabling, new alarm installations and additional unplanned communications costs. To reduce these out-of-pocket expenses, the following incentives are recommended:

- Mandatory batteries for clients with medical alarms including education on battery process during a power outage.

- Pensioner / medical alarm rebate ensuring no out-of-pocket costs for the client or Medical Alarm Provider.
    - Examples: Cover the cost of in-home cabling, battery installation, or first three months free service with RSP. Remove the cost barrier for the vulnerable.

5. Protect and support consumer telecommunications services

To best protect consumers and support their telecommunications services during NBN migration, mandatory supply of batteries for medical alarm clients is essential, as well as improved education on back-up battery usage during a power outage.

In addition, for clients who are unable (e.g. the client lives in a rental property and their landlord does not connect to the NBN) or unwilling to migrate to the NBN (e.g. has

cognitive issues or is generally confused), it is recommended that a rebate is available to these clients to cover the costs of replacing their existing POTS alarm with a mobile alarm (GSM) and assistance establishing a mobile phone service.

Furthermore, it is imperative that NBN Co. maintain the integrity of the Medical Device Register by providing stakeholders with an avenue for continuous updates of de-identified address data. Not doing so leaves new clients vulnerable.

6. Summary

Tunstall presents this information as a source of reference for the Department of Communications. If further information should be required or any enquiries result from this submission please do not hesitate to contact Lisa Capamagian:

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