

Telecommunications Industry Ombudsman consultation on change to Terms of Reference

Inabox Group Limited

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Inabox Group is a leading telecommunications aggregator supplying telco, IT and cloud products and services to SME's, mid-market customers, telco providers and consumer brands. Inabox Group goes to market via 3 primary brands: Telcoinbox, Anittel and Hostworks. Hostworks and Anittel provide a range of telco, IT and cloud services directly to SME's and mid-market customers.

Telcoinbox provides wholesale telecommunications products and services to approximately 440 independent retail service providers and supports hundreds of thousands of services in operation each day through the aggregation and resupply of wholesale telecommunications products and services from numerous carriers and communications suppliers.

In this regard, Inabox Group is in a unique position to observe the impact of NBN connections as a retail service provider and as a wholesale supplier of a wide range of telecommunications products and services.

Summary

Inabox Group supports the proposed changes to the Telecommunications Industry Ombudsman's Terms of Reference.

Inabox Group believes the changes represent a sensible, collaborative approach that will benefit the Telecommunications Industry Ombudsman, industry, and consumers by:

- facilitating quicker and cheaper resolution of small business and residential complaints through reducing obstacles and delays in obtaining key information relating to a complaint via an extended telecommunications supply chain; and
- enabling the Telecommunications Industry Ombudsman to more readily identify and analyse the cause(s) of systemic issues that may be facing significant numbers of consumers.

Observed Operational Outcomes

Inabox Group has seen a significant increase in faults and service delivery resolution times related to NBN connections due to the number of diverse networks that an end-user/customer's connection can pass through between NBNC0 and the customer.



Inabox Group observes that both as a retail service provider and as an aggregator of wholesale services, remediation work timeframes and new connection resolution times have increased consistently and materially

from non-NBN connections, and in a large minority of cases by a multiple of 3 or more.

The diversity and number of systems through which relevant customer information must pass mirrors this. In many cases the lack of any interconnection between the systems of various suppliers in a supply chain means that multiple phone calls between different entities in a supply chain are the only available way to obtain information on a customer request.

Apparent Contributors to Observed Outcomes

In this regard, the lack of integration protocols between NBNCo systems, and those of the small number of CSPs who are interconnected into all NBN points of interconnection, and those of wholesale aggregators such as Inabox Group, are a substantially different operating environment than prior to NBN, when CSPs obtained information from carriers with well-established customer engagement frameworks and systems for access to service information.

Inabox Group notes that due to these operational factors and driven by the long communication chain of carriers and suppliers involved, Inabox Group has been unable to respond consistently to our customers' requests for information and updates in a timely manner.

The proposed changes go towards improving information flows through supply chains, and thus Inabox Group considers that they are likely to result in an improvement of the present situation, at least in respect to complaints.

Inabox Group appreciates this opportunity to respond to the Telecommunications Industry Ombudsman's proposed changes to its Terms of Reference.

Yours faithfully

A handwritten signature in blue ink, appearing to be "AF", written in a cursive style.

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