

20 March 2008

National Broadband Network Panel of Experts  
Department of Broadband,  
Communications and the Digital Economy  
GPO Box 2154  
CANBERRA ACT 2601

Dear Panel,

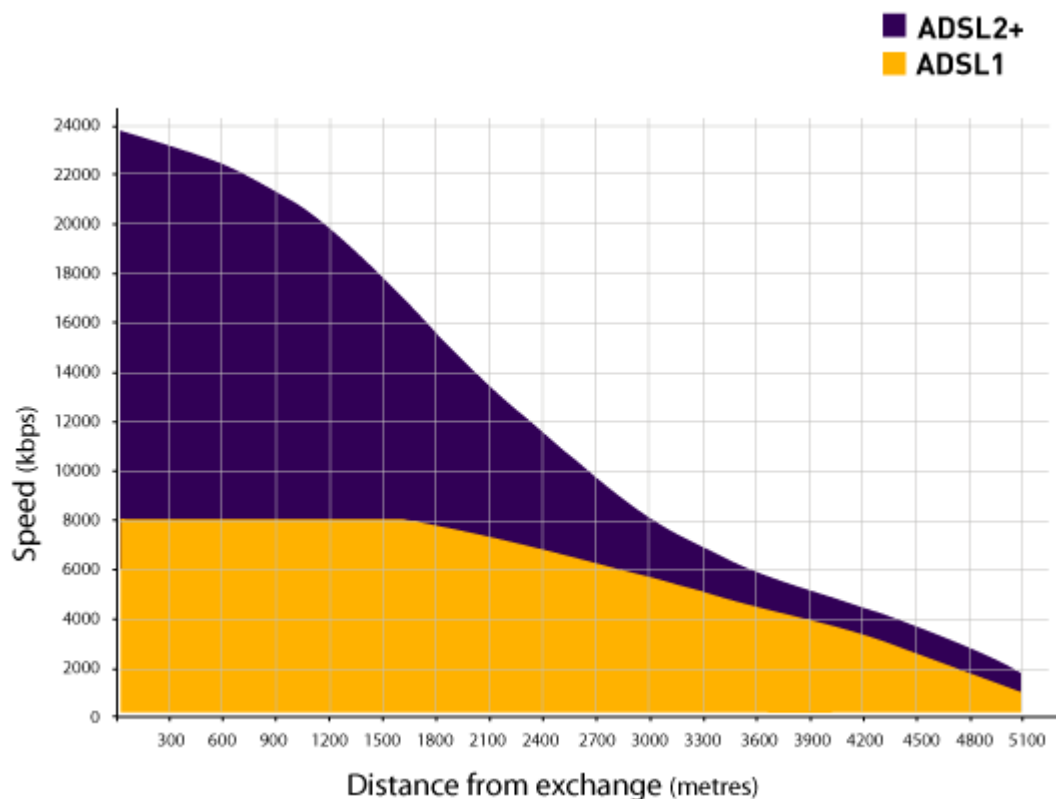
### Joseph Submission on National Broadband Network

This submission supports the Federal Governments' decision to establish a more effective broadband network in Australia and makes suggestions and how to achieve the Governments' policy objectives.

The policy objectives of the Australian Government are to:

- 1) Allows 98% of Australians to
- 2) Achieve broadband internet speeds of at least 12Mbs.

These goals must be addressed together. The nature of ADSL2+ (which can achieve a maximum downstream speed of 24Mbs) is that its speed is **significantly** affected by the distance of the user from their service exchange. Please note the following graph of Speed vs. Distance taken from TPG's webpage (<http://www.tpg.com.au/dslam/faq.php>).



Further factors that affect ADSL2+ speeds are:

- Internet traffic congestion;
- the quality of your line;
- signal strength;

- the number of joins in your line;
- the speed of the websites you visit; and
- factors within your home such as unfiltered devices and lengthy phone cords (<http://www.iinet.net.au/support/broadband/faq/speeds.html>)

Therefore, if the Australian Government is to achieve their policy objectives, 98% of Australians will need to be **closer than 2400 metres** to their service exchange (and also taking account of other factors mentioned above).

## **Result**

Therefore, the government should allocate most of the budget to establish service exchanges across Australia.

Current practice shows that Internet Service Providers (ISP's) will install their own DSLAM at the exchanges to enable ADSL2+ speeds. Therefore, the Government can make more effective use of the budget by allowing the ISP's to cover the costs of installing their DSLAM's at the service exchanges rather than the Government funding these costs.

The primary aim should be to construct the service exchanges at a distance such that 98% of Australians will be closer than 2400 metres to their service exchange.

## **Case Study**

Location: Glenhaven NSW 2156

This is a metropolitan suburb of Sydney. The suburb is attached to the Castle Hill 2154 service exchange which is approximately **6.4km away**. Therefore, this metropolitan suburb **cannot** receive ADSL2+ or ADSL **at all**. There is a surrounding service exchange which may be closer at Kellyville 2155 but **Telstra** has advised they **will not alter** which service exchange the suburb is attached to.

This is although the phone numbers in this suburb are ADSL2+ enabled.

Telstra maintains broadband speeds can be reached at this suburb, however will not guarantee or test the speeds. They also require customers to enter a contract to determine if they can get broadband speeds. This is likely a breach to the *Trade Practices Act 1974* (Cth).

Other ISP's (e.g. TPG) have directly stated it is not currently possible for Glenhaven to receive ADSL or ADSL2+.

I hope you consider the issues raised in this submission.

Respectfully,

Jarrold Joseph

BEC LLB