StreetSpeed

mapping broadband services

ACCC Consumer Consultation on Broadband Speed Claims

StreetSpeed Community Submission

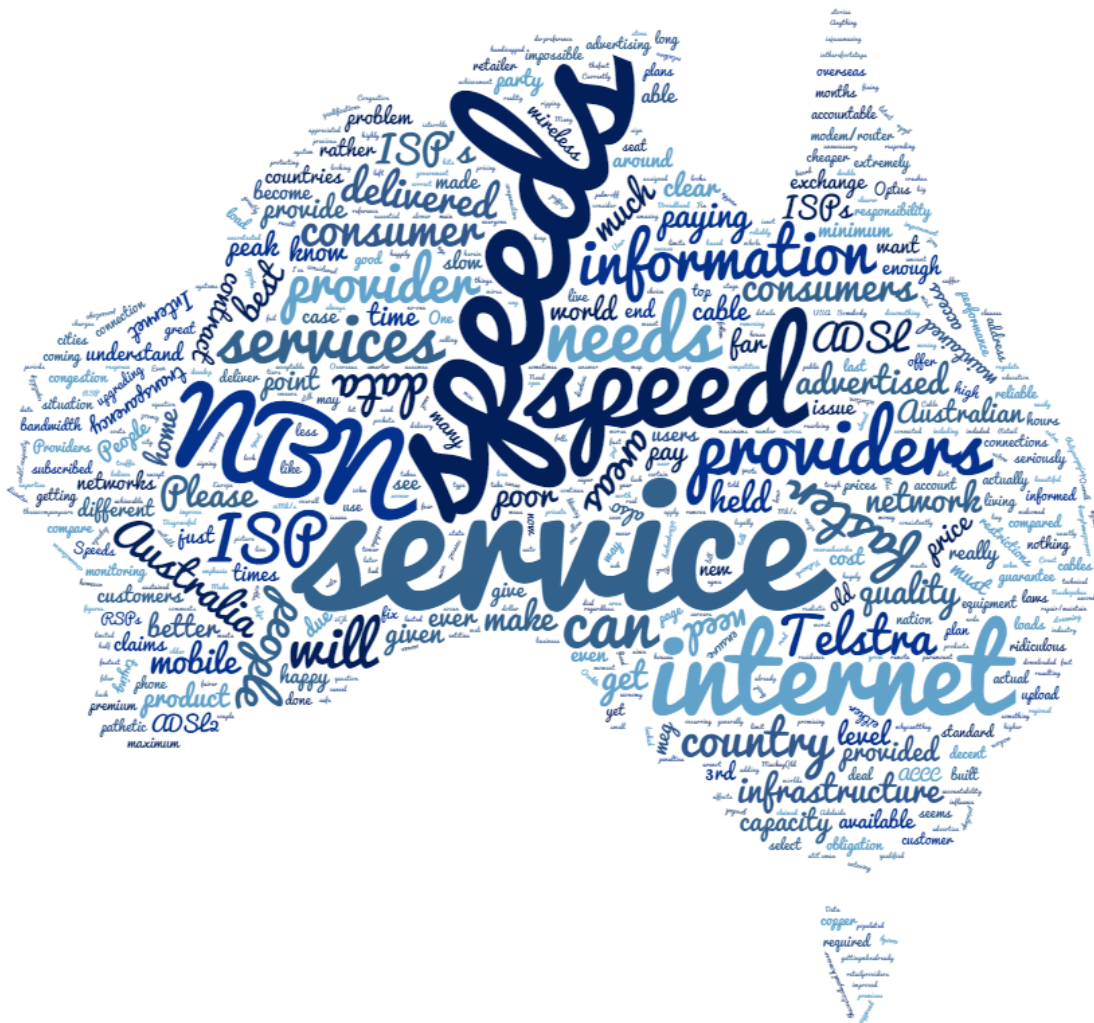25 AUGUST 2016

Contents

(word cloud of frequently used terms in submissions)

About StreetSpeed

StreetSpeed was established in June 2016 as a unique online public good community service to crowdsource broadband service information and display that information in a user-friendly interactive map.

StreetSpeed is unique in capturing and displaying information regardless of service type (ADSL, Cable, Fibre, Fixed Wireless, Satellite, Mobile Broadband) or service provider.

Prior to StreetSpeed, finding specific local information on broadband speeds, services and providers would take a significant search effort. StreetSpeed makes that information easily accessible by empowering the community to be part of the solution and share their own broadband service information.

StreetSpeed was created by David Wiseman who can be contacted on wisehelping@gmail.com with any enquiries regarding StreetSpeed or this submission.

About the Submission

On the 26th July the Australian Competition & Consumer Commission (ACCC) opened a Public Consultation on broadband speed claims. The ACCC has observed that service providers' have generally been slow to provide consumers with clear and specific information about the performance and speed characteristics of their broadband service. The ACCC priority is to make sure consumers are provided with clear, accurate information about broadband services, including information about the realistic speeds that a service provider can deliver.

To achieve this the ACCC sought views on factors that may prevent accurate broadband speed information from being provided to consumers; how these factors may be overcome; and whether similar issues are arising in the marketing of mobile broadband services.

The ACCC set out 8 consumer questions for response, which were put to the StreetSpeed community for response via a simple online form.

A total of **131 responses** were received during the submission period 27/07/2016 – 21/08/2016.

A summary of responses is provided here and the excel spreadsheet containing full responses has been emailed to the ACCC and can also be downloaded from www.streetspeed.info

Submission Summary

"We don't have an ISP, we have an ICP - Internet Connection Provider -service doesn't enter into the arrangement"

This is one of the **727 free text responses** to the ACCC consumer questions and is reflective of the overarching feeling of frustration felt by the **131 consumers** who provided their input as part of a StreetSpeed community submission. Consumers are frustrated at every turn - with actual speeds; with marketed speeds; with providers; with inability to compare; with inability to switch even if you could compare; with infrastructure; and, perhaps unsurprisingly, with the NBN.

Broadband is delivered via a variety of service types, and within service types by a variety of infrastructure quality - leading to a significant spectrum of broadband service offerings and reliability. For consumers, this increases the complexity of comparing broadband services.
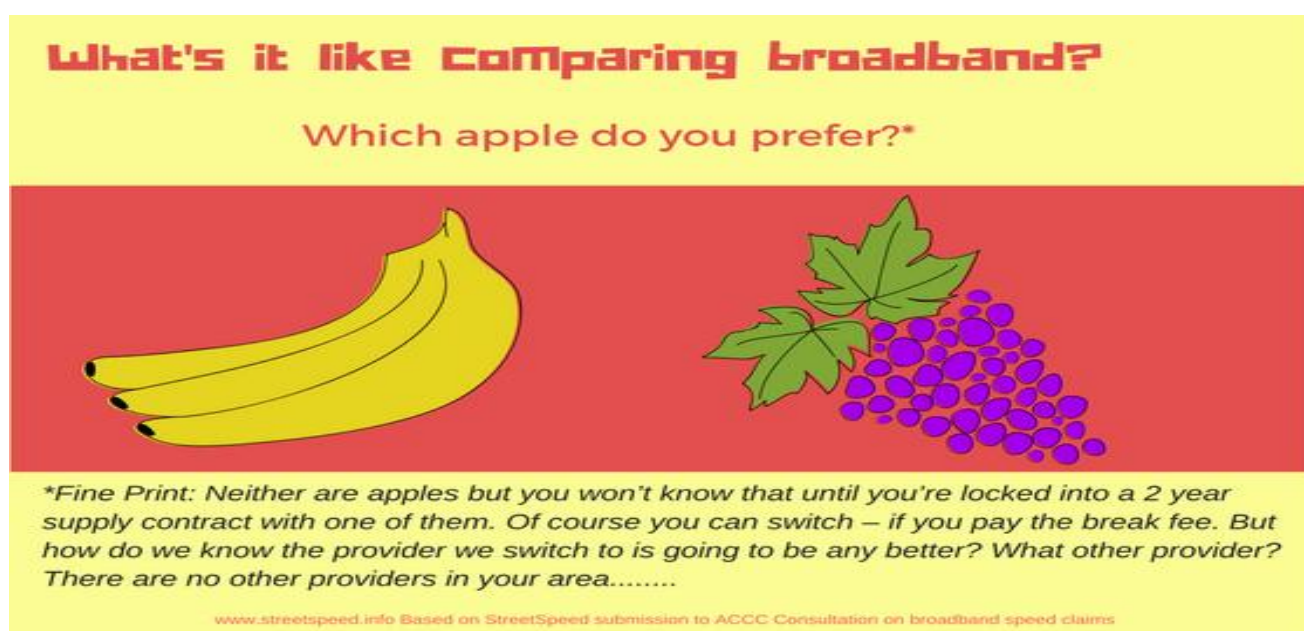

Figure 1: StreetSpeed graphical view of responses regarding broadband comparison

Imagine switching electricity providers only to find your new provider can only supply 240V between 10am and 3PM. Broadband is and must be seen as a utility, as this respondent noted "*broadband has for our household become an essential service that we depend on...*".

Issues of infrastructure were recognised in response to mobile broadband questions with coverage seen as most important. Equity issues in terms of cost of data on mobile plans compared to fixed services also arose, particularly where mobile broadband is the only access option available to a consumer.

This ACCC Public Consultation, alongside the recent ACCC Public Consultation on a Universal Service Obligation have highlighted there is much to do to ensure Australian consumers can access fair, equitable and reliable broadband services. We must now hope that every Australian will be able to enjoy both the current - and the as yet unimagined - social and economic benefits true broadband access will provide.

Summary of Responses

1.   When selecting a retail broadband (home internet) plan, what information about service performance and broadband speed do you consider most helpful? (Free text)

> *"I trust very little information that comes from retailers; instead I speak to my friends and neighbours about their experiences with speed, price and support."*

Responses relating to broadband speed were concerned with the need for ***actual*** download/upload speeds to be provided – not theoretical maximums, with terms such as "accurate" "actual" "real" "true" used in the majority of responses. Alongside actual speed, there was an awareness that speed information must be provided to a meaningful geographic level – ideally the property itself, street or suburb.

Responses relating to service performance were concerned with the need to provide information on service stability/reliability (e.g. outages/sub-par delivery in a period). There was also strong recognition of service performance being ***dependent on infrastructure*** and number of users subscribed in the area, with ***contention ratios*** seen as a key piece of information to be provided. Where service performance issues arose, the need for reliable HelpDesk support was also raised.

2.   Do you find it easy to compare the speed of different internet offers when choosing between internet service providers or particular plans? (Yes/No Response)

Yes: 20% (24 of 131)   **No: 80% (105 of 131)**

2a   If yes, what information do you use to compare broadband speeds? (Free text)

23% (30 of 131) submissions provided a response to this question, with answers primarily relating to seeking feedback from existing users via forums and independent websites, rather than relying on the information provided by the ISP.

2b.   If no, why not? (Free text)

69% (90 of 131) of submissions responded to this question, reaffirming that information provided by the ISP cannot be relied upon; there are too many variables (infrastructure, congestion); and information is provided in differing formats making it confusing to compare. This included confusion caused by common terminology of Mbps (bits per second) in relation to speed and MBPS (bytes per second) in relation to download limits.

> *"No information was provided. I had to choose in the dark. The default response from all providers was that speeds would vary..."*

3.   *Which type of information about broadband speed would make it easier to compare broadband services to meet your home internet needs? (Select from specified options)*

Responses to the specified options were ranked in the following order:

1. *the speed that will be provided to you in practice* **45% (59 of 131)**
2. *an estimate of the likely broadband speed that can be delivered during peak usage times e.g. 7-11pm* **38% (50 of 131)**
3. *a speed 'range'* **6% (8 of 131)**

4.   *Would it help you choose a home internet service if speed and performance information was provided to you in a particular way? (Yes/No Response)*

<u>**Yes: 91% (119 of 131)**</u>   No: 8% (10 of 131)

4a.   *If yes, how would you like this information communicated or displayed for you (e.g. advertising, product descriptions, sales information, written information summaries, web sites, standard information 'labels', or other ways)? (Free text)*

93% of respondents who answered 'Yes', also provided a free text response with the majority of responses reaffirming the overall need for standard summaries (standard across providers) with information on *actual* speeds, including at *peak times* and specific to a *defined area* (property, street, suburb). The need for an independent website to provide this information for ease of comparison across all providers was restated.

> *"A standard for quoting real, actual speeds across all providers. Much like unit pricing for groceries, but with regard to actual likely speeds attainable, peak speed, and average adjusted speed in peak usage times."*

5.   *Overseas, some broadband providers are required or encouraged to provide standard or template information to consumers, including about broadband speed (this is similar to a 'nutrition' label on food products). Would this be helpful in Australia? (Yes/No Response)*

<u>**Yes: 93% (122 of 131)**</u>   No: 6% (8 of 131)

5a. *Why or why not? (Free text)*

Responses for 'Why' this would be helpful reaffirmed the ability to make comparison easier through standardised information across all providers, including ***network transparency with contention ratios.***

> *"Absolutely! This would make it much easier for consumers to make a fair comparison between providers and not get caught in a marketing trap."*

> *"It depends a lot where you live and infrastructure in that area. So a generalised template may be misleading."*

Responses for 'Why Not' raised important issues in formulating any regulation e.g. consumer awareness of factors affecting speed and the need for ***viable infrastructure*** to ensure consistent speeds can actually be provided.

6. *Overseas, some regulators are considering whether new rules should apply when a broadband service isn't as advertised or falls below expectations. Options being considered include automatic compensation and automatically allowing consumers to exit contracts. Do you think any of these options should be used in Australia? (Yes/No Response)*

Yes -98% (128 of 131)   No - 2% (3 of 131)

6a. *Why or why not? (Free text response)*

Responses for 'Why' these options should be used in Australia noted the importance of holding providers accountable for the service offered, in particular when consumers sign long term contracts not knowing what speed/service performance may actually be possible at their property. The need to ensure ISP and infrastructure providers cannot 'pass the buck' as to who is responsible was also noted.

> *"Allowing people to exit due to network performance issues should encourage ISP to invest more in their networks or list plans they can actually provide"*

> *"I think day-to-day performance would be governed by infrastructure more than provider and hence would be the same regardless of ISP"*

Responses for 'Why Not' again raised important issues in formulating any regulation e.g. the possibility of providers throttling speed in order to provide a slower, but stable connection. Whilst not directly mentioned in the responses a Universal Service Obligation with a minimum acceptable standard for broadband speed would provide a benchmark for what can be charged as a broadband service, alleviating risk of throttling.

7.   When selecting a mobile service, is mobile broadband speed an important factor in your decision? (Yes/No Response)

Yes -50% (65 of 131)   No - 49% (64 of 131)

7b   Why or Why Not? (Free text)

Responses as to 'why' were primarily focused on speed always being a key factor; the use of mobile broadband for work purposes; and the use of mobile broadband due to no other options being available.

> *"It's the only option available to us. Despite living next door to a house with cable, we are not even able to access ADSL & have been told we have to wait for the NBN.....however, no-one is able to advise when this infrastructure will be provided to our area."*

> *"The most important feature of mobile broadband is accessibility and coverage. I would like fast mobile broadband but reliable service in all parts of Australia as well as speed is important."*

Responses as to 'Why Not' were focused on two key factors that were seen as more important in selecting mobile services – coverage and cost of data.

8.   *Are there any other comments you would like to provide to the ACCC as part of its consultation on broadband speed claims? (Free text)*

60% (79 of 131) of respondents took the opportunity to provide additional feedback. A number of responses reflected frustration with the NBN rollout, and concern that the NBN would not provide the stability and reliability of service that was needed. The range of technologies being used in the NBN rollout were seen to be providing a similar set of infrastructure issues to the existing DSL network. Another factor related to infrastructure – whether NBN or not – was ensuring consumers are not signed up to already overloaded networks.

The final words of this summary must go to the one respondent, who in response to this question, simply stated:

"Make our internet better"