

## **DP288**

### *Non Functional Requirement Issues - Scaling NFRs for Large Data Holders*

Telstra welcomes the opportunity to provide feedback on this paper. As a Data Holder in the Telecom sector, we are keen to see what the industry experience has been in this space especially in the banking sector in relation to the issue of scaling for large scale Data holders and the TPS requirements.

It is worth noting that not all industries are the same and not all DHs within an industry are the same. We would expect the transaction volumes in the telco sector to be relatively low compared to the banking sector and perhaps more comparable to the energy sector thus a one size fits all approach is not appropriate.

We'd encourage data driven decision making to ensure the right pre-conditions and scaling assumptions are also factored in before any final decisions are made. It would be prudent to also look at the data from the energy sector on the current uptake and performance.

Telstra doesn't support Options 3 & 4 of increase or removal of site wide TPS and session count NFRs resulting in lack of boundary conditions.

Options 1 & 2 and Hybrid options of the same can be considered with a preference towards Option 2 "Tiered TPS and Session Count NFRs based on the number of active authorisations the data holder has" and something that can be explored further through consultations and working groups.

Additionally, We would also recommend to have a clear definition of scaling metrics to all the sub-brands under large data holders which customer base is significantly smaller. The scaling should also be adjusted differently based on peak/off-peak time.