

22 August 2012

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Dear Mr Wright

**Re: Wholesale ADSL FAD Inquiry – Request for information**

I am writing to bring to your attention the likely timeframe over which we are able to respond to the list of questions in your letter dated 10 August 2012 (Request for Information).

We expect that responses to the majority of questions asked in the Request for Information can be provided by 7 September 2012, and we will endeavour to meet this timeframe for those questions. However, there are some questions we will need more time to respond to.

For instance, questions 4, 9, 12 and 14 request Telstra to provide forecasts well beyond the standard planning timeframe. Forecasting in relation to such periods is made difficult due to the high degree of uncertainty that exists regarding the likely state of the market. Accordingly, we will need to give extensive consideration and review to these matters in order to provide the ACCC with meaningful and supportable forecasts.

Further, questions 3, 5, 6 and 7 request Telstra to provide detailed expositions of accounting records that need considerable manual processing. I note that Telstra has previously provided an asset register to the ACCC, later used for the FLSM, within a relatively short time frame. Telstra was only able to meet that timeframe because it had mostly already completed the manual processing prior to the ACCC making the request. We are not in the same position with respect to that part of the Request for Information.

I also note that question 3 requires a reconciliation of the TEM accounting framework to the RAF accounting framework, by 31 August 2012. Such a reconciliation is complex and time consuming to undertake and would not be completed accurately by 31 August 2012.

Accordingly, our proposed solution is to respond to as many questions in the Request for Information as possible by 7 September 2012 and then to provide the remaining more complex information as soon as it is ready thereafter. In the absence of unforeseen circumstances, it is anticipated that we will be able to provide all of the remaining information within 4-6 weeks after 7 September 2012.



Yours sincerely

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