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Claire Preston

Australian Competition & Consumer Commission

Via email: [Claire.preston@acc.gov.au](mailto:Claire.preston@acc.gov.au), [Nicole.ross@acc.gov.au](mailto:Nicole.ross@acc.gov.au),  
[WADSLdeclarationinquiry@acc.gov.au](mailto:WADSLdeclarationinquiry@acc.gov.au).

ACCAN thanks the ACCC for the opportunity to contribute to its Wholesale ADSL service declaration inquiry. ACCAN believes there is merit in extending the WADSL declaration, potentially for five years, as this would continue to provide certainty for consumers in the transition of services to the NBN.

Many consumers do and will continue to rely on their ADSL services until the NBN rollout is complete. In the longer term, consumers outside nbn's fixed footprint, served by Fixed Wireless or Satellite products, may choose to continue their ADSL services beyond the rollout completion. ACCAN has concerns that revoking the declaration at this time may affect the broadband market by reducing the number of providers available to consumers. It is likely that the remote exchanges that serve consumers outside the fixed footprint will continue to have lower investment from other providers, due to the number of consumers per exchange and cost of backhaul. For these areas the declaration ensures that other retail service providers can offer ADSL services, which is very valuable to these consumers who do not have access to the range of technologies and providers as urban areas do. Changing this declaration now, ACCAN fears will result in a lower number of retail service providers offering services.

To provide certainty to consumers in this period ACCAN believes there is merit in extending for a five year period. This will ensure a smooth transition and will ensure that consumers in the remaining ADSL footprint can continue to access affordable services and have choice in providers.

Sincerely

A handwritten signature in blue ink that reads "Rachel Thomas". The signature is written in a cursive style.

Rachel Thomas  
Policy Officer