

Nicole King

Acting Director | Market Evolution & Access | Water and Wireline Markets Branch
Infrastructure Regulation Division
Australian Competition & Consumer Commission
Level 35 | 360 Elizabeth Street, Melbourne

Dear Nicole,

We have no issue with the definitions as published.

Clublinks Telecommunications Pty Ltd (CLT) stated our concerns in our submission to the Draft Decision November 2015.

The introduction to your email of the 21st March states "The ACCC has now completed its review of all submissions received."

If our response has been considered, we have not received any reply or an invitation to discuss or review our concerns.

We explained in our submission that our issue is not only the issue of the Substantive Compliance costs and Administration costs contemplated in your Draft Decision November 2015 (Appendix D Page 65 & 66). These costs are magnified by our 3 year contract commitments for Links to the city and Internet backhaul costs [REDACTED] through to November 2018.

If CLT are not granted an exemption from the implementation of an open wholesale network model until November 2018 the combined effect of our current costs of long term contracts and the added implementation costs of a Wholesale/Retail operation environment would be to force Clublinks to close the network to prevent unsustainable losses.

We look forward to an opportunity to meet with your office to discuss these matters fully and to provide any additional financial or performance data that you may require to verify the accuracy of our claims.

Kind regards,



Brian Mollet
Manager
Clublinks Telecommunications Pty Ltd