



18 November 2019

Mr Robert Wright
General Manager, Insurance, Water and Wireline Markets Infrastructure Regulation
Australian Competition and Consumer Commission
Level 17, Casselden Place
2 Lonsdale Street
Melbourne Vic 3000
Email: robert.wright@accc.gov.au

Copy To:

Australian Competition and Consumer Commission

Mr Rod Middleton
Email: rodney.middleton@accc.gov.au

Mr Darren Kearney
Email: darren.kearney@accc.gov.au

Mr Sean Riordan
Email: sean.riordan@accc.gov.au

Ms Jennifer Crichton
Executive General Manager, Head of Regulatory
nbn
Email: jennifercrichton@nbnc.com.au

Dear Mr Wright

Variations to Telstra's Migration Plan

I enclose for your consideration Telstra's proposed variations to the Migration Plan. Telstra requests approval from the Australian Competition and Consumer Commission (ACCC) for the enclosed variations as allowed under section 577BF of the Telecommunications Act 1997 (Cth).

The key changes in the variations to the Migration Plan relate to three areas for which Telstra has previously received regulatory forbearance from the ACCC and which are now being documented in the Plan for completeness:

- Amendments to extend the timeframes Telstra is required to Managed Disconnect premises which continue to remain not nbn-serviceable, despite NBN Co having initially moved these premises into Service Continuity Regions;
- Amendments to extend the timeframes Telstra is required to disconnect certain DDS Fastway and Megalink Special Services / Special Service Inputs at premises utilising the atomic clock feature where an end-user's operations support critical infrastructure; and
- Amendments to extend the classification of an In-Train Order Premise at a Rollout Region Disconnection Date to include instances where NBN Co has received an



order under an existing agreement or entered into a new agreement, to change the Access Technology by which a premise is nbn-serviceable to Fibre to the Premises.

We would welcome the opportunity to take ACCC staff through the proposed amendments at your earliest convenience, if that would be of assistance.

A detailed supporting public submission on our Varied Migration Plan is enclosed to describe and explain the amendments. We note that NBN Co approves of the proposed amendments.

Our Varied Migration Plan is provided to you in both 'clean' and 'marked up' versions to assist with your review and consultation process. The 'marked up' version shows all changes made from the current Migration Plan (as approved by the ACCC on 26 October 2018).

Please contact Peter Walsh on (03) 8694 3854 if you have any questions in relation to this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Iain Little'.

Iain Little
Director of Equivalence, Regulatory Affairs
Legal & Corporate Affairs
iain.little@team.telstra.com