



1December 2021

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Dear Mr Riordan,

Request for upfront regulatory forbearance to defer the Managed Disconnection window for Waves 84, 87, 89 and 90 during the Christmas and New Year holiday period for 2021/22

We are writing to inform you that Telstra and NBN Co have assessed and agreed the need to defer upcoming Managed Disconnection activity in relation to waves 84, 87, 89 and 90 and Serviceable Complex ready to Connect (RTC) Premises as set out in the table below:

Premises:	Scheduled Disconnection Milestone Impacted:
Wave 84	Service disconnection of Phase 2 In-Train Order (ITO) Premises commencing 16 Dec 2021 Permanent disconnection of Phase 2 ITO concluding 25 Jan 2022
Wave 87	Service disconnection of Phase 1 ITO Premises commencing 22 Dec 2021
Wave 89	Permanent disconnection of non-ITO Premises to conclude by 29 Dec 2022
Wave 90	Service disconnection of non-ITO Premises service commencing 24 Dec 2021
Serviceable Complex Ready to Connect (RTC) Premises	Service disconnections to conclude by 23 Dec 2021 (in accordance with the timeframes that apply to Complex RTC Premises that have been made nbn-serviceable)

Accordingly, we wish to implement these deferrals with RSPs and request regulatory forbearance to disconnection and surrounding activities as outlined in the Migration Plan at Required Measures 2 and 3, specifically the windows these activities are to commence and complete by.

Telstra and NBN Co have been monitoring the progress of premises migration for the waves and Serviceable Complex RTC Premises noted above and based on the most recent number of remaining



active services, we now conclude there is a reasonable argument to maintain service continuity for these remaining services. Telstra and NBN Co consider it would be in the interest of both customers and industry that Service Disconnection is deferred until after the Christmas holiday break.

We have adopted similar arrangements in previous years to minimise the risk of impacted customers facing extended periods of no service during this period.

The proposed arrangements are set out in detail below:

Disconnection Wave	Milestone	Current	Revised
Wave 84 (Disconnection Date 14 May 2021)	ITO Phase 2 Service Disconnection (DD+150 to DD+155)	Commence 16 Dec 2021 Conclude 23 Dec 2022	Commence 10 Jan 2022 Conclude 17 Jan 2022
	ITO Phase 2 Permanent disconnection (DD+175)	Conclude 25 Jan 2022	Conclude 17 Feb 2022
Wave 87 (Disconnection Date 13 Aug 2021)	ITO Phase 1 Service Disconnection (DD+90 to DD+95)	Commence 22 Dec 2021 Conclude 31 Dec 2021	Commence 10 Jan 2022 Conclude 17 Jan 2022
Wave 89 (Disconnection Date 8 Oct 2021)	Non-ITO Permanent disconnection (DD+55)	Conclude 29 Dec 2021	Conclude 10 Jan 2022
Wave 90 (Disconnection Date 12 Nov 2021)	Non-ITO Service disconnection (DD+30 to DD+35)	Commence 24 Dec 2021 Conclude 5 Jan 2022	Commence 10 Jan 2022 Conclude 17 Jan 2022
Serviceable Complex RTC Premises	Service disconnection completed by	23 Dec 2021	25 Jan 2022

In respect of the deferrals to service disconnection milestones described above, in certain instances this will also give rise to flow-on deferrals to the completion of the permanent disconnection step. In such circumstances, the permanent disconnection step will be complete as soon as reasonably practicable following the conclusion of the service disconnections.

Next Steps

Upon the ACCC's decision and in the event forbearance is granted, Telstra will update wholesale customers and our retail business units of the new milestones.

Should you have any queries about this matter please contact Kim Hilton-Cowie (02 9866 2001 or Kim.Hilton-Cowie@team.telstra.com).

Yours sincerely

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