

25 November 2015

Mr Michael Cosgrave
Group General Manager
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Australian Competition and Consumer Commission
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Copy to:
Mr Sean Riordan
General Manager
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Australian Competition and Consumer Commission
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Dear Mr Cosgrave,

Consultation on the Replacement of Required Measure 4

I refer to the conversation on 28 October 2015 between Sean Riordan of your office and Chris Williams of Telstra.

In accordance with clause 5.2 of the Varied Migration Plan accepted by the ACCC on 26 June 2015, we are writing to notify you that Telstra is now commencing consultation on the proposed varied Required Measure 4 to reflect the changes necessitated by the MTM Variations to the Migration Plan. A copy of the proposed varied Required Measure is attached for your attention.

The MTM Variations have required only a few revisions to this Required Measure. However, the move to the MTM for the NBN rollout has resulted in the need for us to build in some additional steps where we no longer control the relevant copper infrastructure required to rebuild the Copper Path in order to supply a Special Service or Special Service Input.

Essentially, the key changes to the replacement Required Measure are:

- where ownership or control of the relevant copper infrastructure has been transferred to NBN Co, we will need to request that NBN Co provide us with a continuity licence and other relevant rights, in order to make use of the relevant copper paths
- we have included a new definitions section to facilitate understanding of the new processes and clarify the meaning of certain terms post asset transfer; and
- while we are not proposing to change the substance of our reporting obligations, we will consolidate all reporting obligations under the Varied Migration Plan (including under the Required Measures) in clause 26 of the Varied Migration Plan in due course once the Required Measures are accepted.

- To avoid repetition, we have consolidated the ordering and provisioning processes for Direct Special Services in Attachment A to include all three provisioning systems, given that the processes are broadly similar and contain the same steps regardless of which provisioning system is used. We believe this will improve the readability of the RM.

We are currently advising Wholesale Customers and NBN Co of the consultation on this Required Measure. Could you please provide your feedback on the varied Required Measure by 23 December 2015.

Please do not hesitate to contact Chris Williams on (07) 3455 3112 if you have any comments in the meantime.

Yours sincerely



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