

17 November 2017

Mr Grahame O'Leary
Director, Transmission Section
Australian Competition and Consumer Commission
Level 20, 175 Pitt Street
Sydney NSW 2000

By email: grahame.o'leary@accc.gov.au
cc: elsbeth.philpott@accc.gov.au

Dear Grahame

INFRASTRUCTURE RKR CONSULTATION PAPER

Optus welcomes the opportunity to respond to the ACCC's Audit of Telecommunications Infrastructure Assets – Record Keeping Rules Consultation Paper.

Optus understands that the ACCC is proposing to amend the Infrastructure RKR to assist the administration of its regulatory functions and responsibilities under Part XIB and Part XIC of the CCA. This letter sets out our views on the proposed changes.

First, Optus supports the amended definitions as set out in the Interpretation section. The definitions are appropriate to capture the relevant data for reporting under the RKR.

Second, Optus has no objection with the updated list of telecommunication infrastructure providers required to report to the ACCC, specifically:

- Request for record-keepers to provide a consolidated report including subsidiaries and/or related entities; in the light of mergers and acquisitions since 2013.
- Addition of larger SBAS and LBAS providers that meet the regulatory threshold of 12,000 services or more to the list of record-keepers; they include OPENetworks Pty Ltd, OptiComm Co Pty Ltd, and Spirit Telecom Ltd.
- Addition of utility providers such as AusNet Services Ltd, Ausgrid Pty Limited and Queensland Electricity Transmission Corporation Limited to the list of record-keepers, because they provide access to communication services over their infrastructure.

Third, Optus welcomes the ACCC's proposal to add and clarify the reporting of mobile infrastructure information as per the Consultation Paper. As part of meeting our annual RKR obligation, Optus voluntarily provides the following information regarding the geographic location of mobile infrastructure:

- a) The geographic extent of mobile coverage (through coverage maps provided as TAB vector format);
- b) The geographic location of each mobile site (including macro cell, micro cell, and pico cell), provided in the GIS file which contain the latitude and longitude;

- c) The technology/s used to deploy the mobile service at each site, which are embedded in the above files; and
- d) The frequency band/s of the radiofrequency spectrum used at each site, which are also embedded in the above files.

We note that the proposed changes would bring up to date the requirements in the Infrastructure RKR to those already provided, or able to be provided, by mobile network operators. Optus believes that this level of information would better enable the ACCC to conduct its regulatory obligations.

Should you have any questions regarding the information contained in this letter, please do not hesitate to contact me.

Regards,

Luke van Hooft
Director Economic Regulation
Optus