

By Email:

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irdadmin@acccc.gov.au

Dear Australian Competition & Consumer Commission (ACCC),

RE: Audit of Telecommunications Infrastructure Assets – Record Keeping Rules – Updated List of Reporting Entities

Thank you for providing the opportunity to comment on the proposed changes to the Record Keeping Rules and Reporting Entities dated 20 October 2021 (Rules).

The paper identifies that the Rules require the identification of organisations that “own and operate significant infrastructure” of “sufficient size as to have a material impact” on telecommunications infrastructure assets market.

In response to Question 1, the Springfield City Group does not believe it is appropriate to add Springfield City Group to the list of record keepers set out in Part 1 of Schedule 1 of the Rules. In our opinion, the dark fibre infrastructure owned by the Springfield City Group does not have a sufficient geographic reach or scale to have a material impact on the Brisbane telecommunications infrastructure assets market to warrant inclusion. Springfield City Group’s dark fibre infrastructure is limited to the South Brisbane area, thus only impacting a sub-segment of the Brisbane dark fibre market in which there are multiple existing providers. In addition, the dark fibre infrastructure has a primary use case of providing capacity to carriers to connect data centres and does not participate in the retail or consumer market. Therefore, we believe the dark fibre infrastructure owned by the Springfield City Group should not be included in the updated reporting list.

Springfield City Group does not have any comments on question 2 to question 11.

Thank you for the opportunity to contribute to the ACCC consultation.

Yours Sincerely,

Peter Blunt

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CITY GROUP