



13 August 2021

Mr Sean Riordan
General Manager, Communication Markets and Advocacy, Infrastructure Regulation
Australian Competition and Consumer Commission
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Copy To:

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Ms Ifa Rushdi, ACCC
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Dear Mr Riordan

Variations to Telstra's Migration Plan August 2021

I enclose for your consideration Telstra's proposed variations to its 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 variations to the Migration Plan relate to two new matters and also two matters for which the ACCC has previously provided regulatory forbearance to Telstra and are now being documented in the Plan for completeness. The variations comprise:

- Changes to the existing managed disconnection arrangements for premises that are Multi Dwelling Unit (MDU) Common Areas. Our proposal removes the existing dependency that requires the End of Rollout Date milestone to be notified by nbn co which has not yet occurred, and replaces it with a new Disconnection Date. This proposal will bring certainty as to the timeframes and arrangements that will apply to the managed disconnection of MDU Common Areas. This proposal is consistent with the updated process document published on telstrawholesale.com.au in January 2021.
- Extending the timeframes for managed disconnection of premises that continue to remain not nbn-serviceable. This proposal is designed to provide a longer-term solution to replace the interim arrangements set out in the Existing Plan. Specifically, the proposal will better align managed disconnection with the making of premises nbn-serviceable by nbn co. This proposal is consistent with forbearance previously granted by the ACCC in October 2020.
- Expanding those 'SS Classes' associated with those Special Services whose Access Service Family is either Payphones (Retail) or Customer Operated Payphones (Wholesale). This proposal is designed to facilitate the differentiation of 'Public' versus 'Private' Payphones services. It will assist Telstra to proceed with an existing proposal



to implement a targeted national product exit on the relatively small number of remaining 'Private' Payphones services still in operation without triggering the disconnection of 'Public' Payphones. This proposal is consistent with forbearance previously granted by the ACCC in December 2020.

- Expanding the current authority within Telstra for the reconnection of copper and HFC services in accordance with the standard conditions within the Existing Plan to include the relevant person accountable for disconnections within InfraCo. This proposal reflects changes to roles and responsibilities within Telstra's organisational structure since this obligation was incorporated in the Existing Plan numerous years ago.

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 6 February 2020). Both documents, together with our public submission, are dated 5 August 2021 reflecting the finalisation of the drafting within Telstra as opposed to the date of submission to the ACCC.

Please contact Peter Walsh (peter.walsh.2@team.telstra.com) if you have any questions in relation to this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Iain Little', is located below the 'Yours sincerely' text.

Iain Little
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Sustainability External Affairs and Legal
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