

# Submission in response to ACCC Consultation Paper

## **Audit of Telecommunications Infrastructure Assets - Record Keeping Rules dated 20 October 2021**

Public Version

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## INTRODUCTION

Uniti welcomes this opportunity to provide its view on the proposed amendments to the *Audit of Telecommunications Infrastructure Assets - Record Keeping Rules*.

The numbering of our response corresponds to the numbering of the consolidated list of questions.

### Update to the list of record-keepers

1. Uniti agrees that it is appropriate to include Aussie Broadband, DGtek, FibreconX, Leading Edge and Springfield City Group in the list of record-keepers.
2. Uniti is of the view that all carriers who provide CAN should be included in the list of record-keepers, including fixed wireless and cellular providers. The inclusion of a wider group of record-keepers will maintain the currency and relevance of the reporting data and better reflect the full range of service offerings.

If the list of record-keepers is intended to reflect only entities that own or operate significant telecommunications infrastructure, then our view is that the following entities should also be included in the list of -record keepers: Lightning Broadband and Gigafy.

Lightning Broadband is a non-NBN superfast internet solutions provider which was established in 2016. It is a supplier of direct fibre and hybrid 5G in Victoria and Queensland for greenfield apartment buildings, residential broadacre developments, commercial business parks and office towers. It partners with smart building suppliers, integrating their technologies with building broadband service.

Gigafy Pty Ltd is a Queensland based affiliate of Gigafy based out of Texas, USA. It is a supplier of high speed internet for residential buildings as well as for hotels, resorts and various venues across Australia.

3. We have no comment in relation to the inclusion of satellite service providers.

### Reporting on end-user equipment

4. Uniti is currently in the process of updating its reporting processes and will be in a position to provide location reporting on end-user equipment within 12 months.

### Further information on mobile infrastructure

5. We have no comments in relation to the section in relation to mobile infrastructure.
6. No comment
7. No comment
8. No comment

### Aggregation of infrastructure reports at a national level and Explanation of map elements

9. We have no objection to the change to the provision of report contained in a single file, however, in respect of record-keepers with multiple subsidiaries and/or related entities, it should be clarified that those subsidiaries and/or related entities may provide separate reports.
10. Subject to the clarification that subsidiaries and/or related entities may submit separate individual files, the proposed amendments are adequate.

### Notice of Changes in methodology

11. No comment.