

Our Ref: D/17/75074

Mr Matthew Chan
Analyst, Transmission and Facilities Access Section
Infrastructure Regulation Division
Australian Competition and Consumer Commission
Level 20, 175 Pitt St, Sydney 2000

Sent via email: matthew.chan@acc.gov.au

Dear Mr Chan

Re: 2017 Audit of Telecommunications Infrastructure Assets – Record Keeping Rules consultation paper

Outlined below is the Victorian Rail Track Corporation (VicTrack) submission with regard to section 4 of the 2017 Audit of Telecommunications Infrastructure Assets – RKR consultation paper.

1. These definitions are appropriate to capture relevant data for reporting.
2. For the reasons set out below, VicTrack recommends that it be exempt or removed from the list of record keepers.

Under the *Transport Integration Act 2010* (Cth) VicTrack's function with respect to telecommunications is limited to developing its telecommunications network and services to support the Victorian transport system. Due to that limitation, VicTrack only supplies services to three main customers as well as some small business and Victorian Government customers.

Given the statutory limitation on VicTrack's network development and the supply of services to an extremely limited section of the market;

- It is unlikely that any competition issues will arise
- It is unlikely that any meaningful data relating to the matters set out in section 151BU(4) will be recorded, and
- The cost of compliance far outweighs the benefit that can be derived from the limited data that may be recorded

3. No comment
4. No comment
5. No comment

VicTrack

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VicTrack

6. VicTrack does not operate a public mobile network
7. The RFNSA Site ID number should be the industry standard for Mobile Site ID in Australia
8. No comment
9. No comment
10. No comment
11. As per response to question 2.

Please feel free to contact me should you have any further questions on 03 9619 0231.

Yours sincerely



Bruce Moore
General Manager Telecommunications Group

23/11/2017

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