



Domestic Mobile Terminating Access Service (MTAS) Declaration inquiry
Report of the ACCC's Draft Decision

Submission by AAPT Limited
to
Australian Competition and Consumer Commission (ACCC)

- 1) Thank you for the opportunity to comment on the Report of the ACCC's Draft Decision on the Domestic Mobile Terminating Access Service (**MTAS**) Declaration Inquiry, dated 13 December 2013.
- 2) AAPT welcomes and agrees with the ACCC's preliminary view that the declaration of the domestic MTAS should be extended for five years.
- 3) Although AAPT is disappointed with the ACCC's decision not to proactively conduct an inquiry into the declaration of a mobile originating access service (**MOAS**) at this time, AAPT is encouraged by the ACCC's statement that it will continue to monitor the proposed freephone and local rate numbers arrangements. In this respect, AAPT notes the following:
 - a) commercial negotiations are currently taking place within industry to agree new MOAS rates in light of the impending implementation of the freephone and local rate numbers arrangements;
 - b) there is currently difficulty in reaching agreed commercial outcomes given the differing commercial motivations of mobile network operators, integrated fixed network providers and non-integrated fixed network providers (as set out in AAPT's submission in response to the initial MTAS declaration review discussion paper); and
 - c) any form of guidance from the ACCC as to the pricing of the MOAS is likely to incentivise and facilitate parties reaching agreement.