



12 October 2018

Fixed Line Services Declaration Inquiry
Australian Competition and Consumer Commission
fixedline@acc.gov.au

Dear Mr Hunt

Re: Fixed line services declaration inquiry consultation and position paper

The Australian Communications Consumer Action Network (ACCAN) welcomes the opportunity to provide feedback on the Australian Competition and Consumer Commission's (ACCC) consultation and position paper in relation to the fixed line services declaration inquiry. ACCAN is Australia's peak communications consumer organisation representing individuals, small businesses and not-for-profit groups as consumers of communications products and services.

ACCAN supports the ACCC's position to extend the six existing declarations of the fixed line services for five years until 30 June 2024. ACCAN views the longer declaration period will provide certainty and stability should there be any delays with the NBN rollout. In addition, there is considerable uncertainty regarding the universal service obligations and the future for Telstra's legacy network where the NBN will not have fixed line infrastructure.

Many Australians still rely on a fixed line service connection and it would be premature to remove wholesale regulation before the post-NBN arrangements are known. The longer declaration is imperative to provide certainty for consumers that their ISP will have continued access at regulated prices until future policy is determined. ACCAN will provide further comments regarding the prices for the declared services at the next stage of the inquiry.

Please contact us on the details below should the ACCC require any further information.

Regards

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