



22 August 2015

Mr Sean Riordan
General Manager – Industry Structure and Compliance
Australian Competition and Consumer Commission
Via: market.indicators@acc.gov.au

ACCAN thanks the Australian Competition and Consumer Commission (ACCC) for the opportunity to contribute to its consultation on the proposed NBN Wholesale Market Indicators Report. ACCAN is supportive of the ACCC's proposal to provide a quarterly overview of the wholesale market for NBN access services.

ACCAN agrees that through reducing the barriers to entry and the information asymmetries present in the wholesale network, end users will ultimately benefit from an increased availability of a greater range of products and services. We are supportive of the ACCC reporting a count of services in operation by NBN access seekers. Providing such information will aid transparency and the development of public policy and benefit competition in the wholesale market. Furthermore ACCAN supports the ACCC's assessment that the disclosure is unlikely to harm the legitimate commercial interests of carriage service providers. Rather, it is likely to aid in commercial decision making and promote competition between retail providers. ACCAN notes the limitations outlined by the ACCC in interpreting the data.

In response to question 5, ACCAN is supportive of reporting on utilised CVC figures. The release of this information will ensure the economically efficient use of and investment in telecommunications infrastructure. Sourcing information on the wholesale market can be costly for access seekers, providing this information will improve decisions and reduce market entry barriers. Access seekers have previously expressed concern with the pricing model having an inappropriate balance between access and capacity charges.¹ By reporting on CVC utilisation, it may be possible to identify areas that demonstrate these concerns and could benefit from greater investment and competition. In response to question 6, ACCAN is supportive of reporting by all speed tiers rather than grouping the speed tiers as it provides greater transparency of the services in the market. This information would aid decisions about the demand for wholesale NBN services.

Sincerely

A handwritten signature in blue ink that reads "Rachel Thomas".

Rachel Thomas
Policy Officer

¹ <https://www.accc.gov.au/regulated-infrastructure/communications/monitoring-reporting/nbn-services-in-operation-record-keeping-rules>