



Australian
Competition &
Consumer
Commission

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Contact officer: Nicole Ross
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6 December 2016

Jane van Beelen
Executive Director Regulatory Affairs
Telstra Corporation Limited
Level 20, 400 George Street
SYDNEY NSW 2000

Dear Ms van Beelen

Re: ACCC's 2016 wholesale ADSL declaration inquiry

I am writing in reference to the Australian Competition and Consumer Commission's (ACCC's) current declaration inquiry into the wholesale ADSL service. In particular, I refer to Telstra's submission to the draft decision on the Wholesale ADSL service declaration, which provided information on Telstra's wholesale business grade Ethernet (TWBGE) product.

The purpose of this letter is to seek further information from Telstra as the ACCC clarifies its understanding of products used to facilitate the transmission of traffic between the point of interconnection (POI) and the point of presence (POP), such as TWBGE, WWS and Broadband Aggregation and how they are supplied with the wholesale ADSL service. This information will assist the ACCC in preparing its final decision.

The ACCC's questions are set out in the attachment to this letter.

We would appreciate your responses by close of business on Monday 12 December 2016.

If you would like to discuss this matter, please contact Nicole Ross at Nicole.Ross@acc.gov.au or on 03 9290 1957.

Yours sincerely

Robert Wright

General Manager

Infrastructure Regulation Division

ATTACHMENT

1. Please advise where Telstra considers the relevant POI used to supply the declared wholesale ADSL service is located.
 - a. Does Telstra consider the POI to be at the IGR – and on which side of the IGR is it located?
2. Please confirm whether an access seeker can self-supply (using their own or a third party's infrastructure) a backhaul access service or product to facilitate the transmission of traffic from the point of interconnection (POI) to the access seeker's point of presence (POP). If access seekers cannot self-supply their own transmission equipment between the POI and the POP, please explain the technical (or other) limitations that prevent this.

If it is the case that access seekers purchasing wholesale ADSL can self-supply their own transmission equipment:

- a. What would be required on Telstra's part to allow this arrangement to take place?
- b. Please outline what Telstra systems and/or network elements would be used to facilitate this self-supply. (For example, does connection occur at Telstra's IGR? Which access seeker-operated system does the connection take place at?)

Please provide this outline using the DSL Internet Grade diagram available on your website at: <https://www.telstrawholesale.com.au/products/broadband/adsl.html>.

3. Please advise us of the number of points of interconnection (with respect to the declared wholesale ADSL service) that are located at the same physical address (that is, co-located) as access seeker points of presence?
 - a. Please provide any further information you consider relevant in relation to these instances (if any) of co-location and how it impacts the use of network infrastructure? Are there any significant differences or implications of co-location?
 - b. Do access seekers who acquire the declared WADSL service and also acquire the TWBGE/WWS/Broadband Aggregation product reflect instances where the POI is not co-located with their POP?
4. Please indicate which other services (if any) are purchased by access seekers for use with the TWBGE, WWS and/or Broadband Aggregation products? Is this purchase mandatory or discretionary?
5. Please provide an outline and comparison of the following products:
 - Telstra Wholesale Ethernet (TWE) with reference to differences with the TWBGE product that Telstra has previously submitted information on.
 - Broadband Aggregation product
 - TWBGE.

Please provide the same level of detail as that already provided in relation to the TWBGE product by Telstra in its recent submission to the draft decision?

6. Please explain, in more detail than has been provided to date, the technical and other constraints that prevent DTCS being used to provide a similar functionality to the TWBGE, WWS and Broadband Aggregation products?
7. Consistent with the information provided to the ACCC by Telstra in its response to the ACCC's 2015 information request on wholesale ADSL on 17 August 2015, please provide updated pricing for the following products:

- TWBGE
 - WWS
 - Broadband Aggregation
 - DTCS, and
 - any other alternative services.
- a. Please present this pricing data on a **Mbps per customer, per month basis**.