



August 16, 2013

Mr Rod Sims
Chairman
Australian Competition & Consumer Commission
23 Marcus Clarke Street
CANBERRA ACT 2601
Via email: rod.sims@acc.gov.au

Dear Mr Sims,

Thank you for the opportunity to participate in the round table access seeker discussion in relation to the ACCC's consideration of the NBN Co SAU and attendant Draft Variation Notice.

Subsequent to that discussion, members of the Competitive Carriers Coalition (CCC) have again re-visited the issue of the price review mechanism in relation to NBN Co services. It remains their strong view that the window for review of NBN prices ought to occur on a more regular basis than currently expressed in both the SAU and Notice to Vary.

Whilst it is necessary to regularly review pricing in relation to the access charges, it is clear that the initial experience of access seekers indicates that the structure of the CVC charge is *already* acting to undermine the business case of NBN Co customers. This concern arises due to the unexpectedly high data usage of customers connecting to the NBN.

We look forward to ongoing dialogue with the Commission as this critically important regulatory framework around NBN Co is finalised over the coming weeks.

Kind Regards,

Matt Healy
Chairman
Competitive Carriers' Coalition