

16/01/2023

To Whom This May Concern,

Regarding the submissions that the ACCC is requesting from industry, business, and end-users, I am hereby issuing a submission as an end-user.

I have read NBN Co's revised SAU, and have a few concerns that will affect some end-users, should they come to pass. While I accept that NBN Co may need to raise some prices for some plans (and decrease some prices), to gain the revenue required to keep the network operational, pay down debt, and make any necessary improvements in the future (either short-term, or long-term), there is a caveat to the price increase for the 50/20Mbps plan that would catch some users out, and unfairly charge them more money for a situation which isn't their choice.

As a prime example, I am on a FTTC connection in Zillmere QLD (between the Zillmere exchange, and Zillmere Road). While FTTC is capable of operating at 100Mbps down, my lead-in is not capable of this, and I am limited to 55Mbps down, so rightfully, I have chosen the 50Mbps plan, as that is all I can achieve. The plan to increase the pricing on the 50/20Mbps plans would therefore unfairly charge me extra, as I have no doubt that NBN Co's decision is predicated on the idea that people are choosing the 50/20Mbps plan as that is all they **need**. For me, it is all I can **get**. While there is a plan in motion to upgrade FTTB/N/C to FTTP, Zillmere has not been mentioned as eligible for this upgrade, and NBN Co have (in effect) also mentioned that not all premises in the FTTB/N/C footprint will be eligible, so there is the possibility (however unlikely) that I may never get FTTP, or get my lead-in replaced, as for all intents and purposes, it is "working". I would ask that the ACCC keep this caveat in mind when they make their judgement on the SAU and the pricing increases, as there is no way for the end-user to raise issues like this with NBN Co (and thus no way to get them resolved).

I would also like to comment on the AVC/CVC situation. Given the price increases/decreases, and NBN Co's discussions about removing the CVC component, I would suggest that the removal of the CVC is fast tracked, and the pricing for the AVC be adjusted to cover the operating costs for the connection, with the possibility of the AVC being tailored for the connection type (ie less cost for FTTP, but more for Fixed Wireless, and more for Satellite). Any cost required for any FTTB/N/C that exists in the network after the FTTP upgrades could be charged at either the median cost across all remaining connections, or near/at the highest rate for the connections (ie, if one connection costs more to maintain, the AVC charge for all other FTTB/N/C connections could be charged at this cost, or close but not above it).

One final submission I would like to make, is regarding the FTTP upgrades, though this may be outside the scope of the SAU. Upgrades of this nature should be fast-tracked for areas that are prone to natural disasters, especially flooding. I did not have a working FTTC connection in the February/March 2022 floods in QLD, but given the water flowing along my street, and down various

driveways, I have no doubt that the pits and pipes were full of water, so the FTTC equipment more than likely would have been non-operational until it all dried out. Fast-tracking areas like this for FTTP upgrades would help with the installation of water-resistant equipment, which would in turn keep the network running. This would also reduce the operational costs for NBN Co, as they would not have to pay to have the water in pits/pipes vacuumed out, field calls about “faults” for flooded FTTC equipment, or replace any FTTC DPUs that fail due to water ingress.

Regards,

Chris Hucklebridge

████████████████████