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Review of NBN Services in Operation RKR and NBN Wholesale Markets Report

Dear Graeme

The CCC welcomes the opportunity to comment on the review of the NBN wholesale services report and the associated RKR.

The CCC believes the RKR should be extended. The rollout of the NBN has reached a critical stage and the need for clear and reliable data on the rollout, the services being offered and the developing wholesale market is becoming more important.

Further, the data around AVC and CVC services in operation is important in the context of the increasingly fractious public debate about end user performance of NBN services in operation.

Independent and verifiable data will be a necessary element in the development of any effective responses to problems in performance and to understanding the context of developments in competitive downstream markets.

Given these circumstances, the CCC believes the Commission should:

- Extend the RKR for a five year period, to beyond the conclusion of the rollout
- Move to a monthly reporting cycle, reflecting the heightened public concerns about the NBN user experience, and the growing demands for action to address these problems
- Report on evidence of AVC numbers per CVC, and of CVC utilisation rates

Yours Sincerely

David Forman