

23 September 2011

Mr Michael Cosgrave
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Commission
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Confidential communication

Dear Mr Cosgrave

Final access determinations' exemptions provisions - variation inquiry - Request for extension of time

I refer to the Commission's *Inquiry into the exemption provisions in the final access determinations for the WLR, LCS and PSTN OA services - Issues paper* dated September 2011 (**Issues Paper**) (**Exemptions Variation Inquiry**) to which the Commission seeks submissions by 5:00pm on 30 September 2011.

In light of the number and breadth of questions in respect of which the Commission seeks the submissions of interested parties, ranging from theoretical issues such as the continued relevance of the "ladder of investment" theory to technical issues such as the substitutability of VoIP and mobile services and fixed line voice services, it has become apparent that Telstra cannot respond fulsomely in the relatively short time frame provided.

In order to assist the Commission in relation to the Exemptions Variation Inquiry, Telstra is updating a significant amount of evidence that it has provided to the Commission to date in relation to the current state of competition in exempt areas. Telstra is also compiling a significant amount of new data, particular in relation to the substitutability of VoIP and mobile services, including a detailed witness statement. Further, Telstra is obtaining four expert reports addressing a number of questions asked by the Commission in the Issues Paper. Those experts have requested a significant amount of data in order for them to prepare their reports, which Telstra is compiling and providing to those experts as soon as the data is finalised. However, realistically, those experts will need a reasonable opportunity to consider the data and prepare and finalise their reports.

Upon the finalisation of those experts' reports, Telstra will need a reasonable opportunity to review those reports and prepare and finalise its submissions to the Issues Paper.

Telstra considers that a short extension of two weeks will be sufficient to undertake all of the above work.

Accordingly, Telstra requests that the Commission extend the timeframe within which interested persons are to make submissions from 30 September 2011 to 14 October 2011.

In that regard Telstra notes that the timeframe within which submissions are to be made would be approximately six weeks long, which is a slightly shorter timeframe to that provided for by the Commission in its discussion papers in respect of Telstra's original WLR, LCS and PSTN OA exemption applications.

We look forward to hearing from you, and in the meantime please contact Amelia Moore on (03) 8649 2042 or amelia.moore@team.telstra.com should you have any queries.

Yours sincerely,



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