



Maddocks

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**Macquarie Telecom**

Submissions – Telstra's  
Structural Separation  
Undertaking (Further  
Draft)



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## Email Letter

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### Submission – Telstra’s Structural Separation (Further Draft)

#### 1. Introduction

Maddocks has prepared this submission on behalf of Macquarie Telecom Pty Limited (**Macquarie**) in response to the Australian Competition and Consumer Commission’s (**ACCC**) paper titled ‘Telstra’s Structural Separation Undertaking’, dated December 2011 (the **December Discussion Paper**).

Macquarie appreciates the efforts taken by the ACCC to facilitate consultation regarding Telstra’s Structural Separation Undertaking (**SSU**) and welcomes this opportunity to respond to the December Discussion Paper. During the consultation process, Macquarie has made extensive submissions to the ACCC regarding the various drafts of the SSU and related Telstra proposals both on its own behalf and as an active member of the Competitive Carriers’ Coalition (together the **Previous Submissions**).<sup>1</sup>

In Macquarie’s view the revised SSU submitted by Telstra, while it provides certain improvements over Telstra’s initial document, still fails to provide for equivalence, transparency, monitoring and compliance in an appropriate and effective manner.<sup>2</sup>

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<sup>1</sup> Macquarie’s Previous Submissions include the following, which include submissions made by the Competitive Carriers’ Coalition: Competitive Carriers’ Coalition, *Submission on Initial Concerns with Telstra Structural Separation Undertaking*, 31 August 2011; Competitive Carriers’ Coalition, *Response-Assessment of Telstra’s Structural Separation Undertaking-Discussion Paper*, 27 September 2011; Competitive Carriers’ Coalition, *Submission in Relation to the Removal of Broadband Traffic from Telstra HFC Network*, 29 September 2011, Competitive Carriers’ Coalition, *Supplementary Submission-Service level rebates* 2 November 2011; Macquarie Telecom, *Assessment of Telstra’s Structural Separation Undertaking and draft Migration Plan*, 27 September 2011; and Competitive Carriers’ Coalition *Response – Industry Forum and Further Assessment of Telstra’s Structural Separation Undertaking and Additional Proposals*, 18 November 2011.

<sup>2</sup> Sections 577A(3) and 577A(5) of the *Telecommunications Act 1997* (Cth).





