

MultiWave Networks - ACCC NBN SAU Consultation Response

MultiWave Networks is a NBN-only challenger RSP, operating since 2017. Our focus is the provision of services to regional and remote Australia, and for the domestic broadband market our business model has been one of wholesaling NBN services to local providers who then on-sell to the End Customer.

General Feedback on Desired SAU Outcomes

From the perspective of a challenger RSP, some of the most important criteria sought are:

- Long-term price certainty;
- Costs that scale predictably in line with growth, or scaling back, in the market place;
- Protection from ad-hoc 'bill shock' events, particularly if these cannot be reasonably passed on to the End Customer;
- An appreciation that there is going to be an ongoing and inexorable increase in data consumption per user, that must be accommodated within the pricing structures, not an opportunity for NBN Co to increase margins down the track;
- Reasonable costs in accessing the multiple PoIs required to offer a comprehensive service to regional/remote Australia – being forced to use an aggregator has the downsides of reduced margin per service, and potential delay of any pass-through of future NBN price reductions.

View on Current SAU Proposals and Options

We welcome the progress that has been made during the long SAU consultation process and consider that the changes assist in meeting the above criteria. In particular, the floor and ceiling approach, inclusion of CVC bandwidth, the Overage Waiver Threshold, and the reduction in monthly NNI charges for 1G interfaces are welcomed. We remain of the opinion that the single biggest barrier faced by new entrants and smaller RSPs remains NBN's multiple PoI connectivity architecture, and that mechanisms could and should be provided to these RSPs to overcome this issue.

Notwithstanding, we consider that NBN's August 2023 SAU proposals should be adopted so that the industry can, once again, move ahead with a degree of certainty. Of the options presented, our preference is for the adoption of Option 2.

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