



25 October 2018

Mr Andrew Hunt

By email: [fixedline@accg.gov.au](mailto:fixedline@accg.gov.au)

Dear Andrew,

### Fixed line telecommunications services declaration inquiry – Consultation and position paper

**nbn** welcomes the opportunity to comment on the ACCC's Consultation and position paper on the 'Fixed line telecommunications services declaration inquiry'.

The focus of this submission is on how the outcomes of the current declaration inquiry may affect the achievement of a smooth migration to the **nbn**<sup>TM</sup> access network over coming years. As set out in the **nbn** Corporate Plan 2019-22, the build of the network to homes and businesses across Australia remains on track for completion by June 2020, and our overarching goal to connect eight million homes and businesses to services over the **nbn**<sup>TM</sup> access network also remains on track for completion by the end of 2020.

In this context, and consistent with our previous submissions in regard to the regulation of fixed line telecommunications services, **nbn** submits that stability is likely to promote the long term interests of end users. **nbn** is therefore broadly supportive of the ACCC's proposed approach to extending the existing declarations for a period of five years.

We note that the relevance of, and any regulatory cost arising from, the declarations will diminish significantly in the next few years with the Telstra Migration Plan overriding the obligation on Telstra to supply a number of the declared services once relevant disconnection timeframes are passed. Nonetheless, the legacy network (and the fixed line declarations) will still have an important ongoing role to play in those areas that are outside the footprint of **nbn**'s fixed network.

If you would like to discuss any aspects of this letter, please contact Matthew Cole, GM Access Regulation, at [matthewcole@nbnco.com.au](mailto:matthewcole@nbnco.com.au).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'James Endres', is written over a light blue horizontal line. The signature is fluid and cursive.

James Endres  
Executive General Manager – Regulatory Strategy (Acting)

