

Mr Matthew Schroder
General Manager
Infrastructure and Transport – Access and Pricing Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

By email: transport@acc.gov.au

Dear Mr Schroder


I refer to the Australian Competition and Consumer Commission's (ACCC) request for submissions in response to its draft decision on the Australian Rail Track Corporation's (ARTC) 2024 Interstate Access Undertaking application.

Qube supports the amendments proposed by the ACCC in its draft decision and notes the adoption of a number of key improvements put forward in submissions by the Rail Operators' Group and individual rail operators.

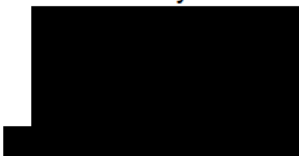
The draft 2024 Interstate Access Undertaking needs to drive integration of ARTC's assets with the national rail network through the on-going development of initiatives including an annual stakeholder forum, the Interstate Network Development Strategy, progressing inter-operability and the development of guidance on improved capacity management. Qube supports further amendments to the proposed Undertaking which promote access to the network and improve rail's ability to compete in the land transport market.

With this in mind, the 2024 Undertaking needs to be viewed as a transitional document. Future undertakings must enable the rail freight industry to compete in contestable transport markets and provide services to support delivery of Government policy and the expectations of ARTC's shareholders.

In response to the ACCC's request for the comments on the proposed amendments to the indicative track access agreement, Qube comments have been incorporated in the attached spreadsheet.

If you have any questions, please contact 

Yours sincerely



National Rail Access Manager