

## Review of the National Broadband Network Services in Operation Record Keeping Rules (NBN SIO RKR) and NBN Wholesale Market Indicators Report (WMIR)

### Attachment: Telstra Responses to ACCC questions

| #  | Question   | Telstra Response   |
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| 1  | Should the ACCC extend the operation of the NBN SIO RKR?   | The RKR should be extended in the interests of transparency and for the reasons in s 3.1 of the Consultation Paper.  |
| 2  | If so, for how long should the ACCC extend the NBN SIO RKR?  | An extension period of three years, as proposed in the Consultation Paper, seems appropriate, including in light of the anticipated remaining duration of the NBN network roll-out.  |
| 3  | Should the ACCC vary the NBN SIO RKR and if so, what modifications or additions should be made to the RKR?   | Telstra does not believe that the NBN SIO RKR should be varied as proposed by the ACCC. Please refer to Telstra's letter in response to the Consultation Paper for more detail.  |
| 4  | Should NBN Co provide information under the NBN SIO RKR on CVC capacity including the number of AVCs per CVC link for each access seeker group at each POI?  | No, Telstra does not consider that this is appropriate nor will provide the ACCC with useful information. Please refer to Telstra's letter in response to the Consultation Paper for more detail.  |
| 5  | Should NBN Co report by state rather than by state group?  | Yes, reporting by state would be useful and appropriate.   |
| 6  | NBN Co currently reports on CVC utilisation rates over the reporting period as well as during peak periods. Should NBN Co also specifically report on CVC utilisation rates where an access seeker exceeds a specified limit (for example 95 per cent) during particular periods (e.g. hourly, daily, weekly) at each POI? | No, Telstra does not consider that this type of reporting would provide the information that the ACCC is seeking and that alternative means of monitoring network performance would be more appropriate. Please refer to Telstra's letter in response to the Consultation Paper for more detail. |
| 7  | Should NBN Co report to the ACCC on a more frequent basis?   | No, Telstra sees minimal benefit from more frequent reporting, other than imposing additional regulatory burden on the reporting party. The current quarterly reporting schedule is appropriate.   |
| 8  | Should the ACCC reissue the Disclosure Direction to NBN Co if the Rules are extended?  | Yes, Telstra considers that it would be appropriate to reissue the Disclosure Direction to NBN Co if the Rules are extended.   |
| 9  | Are there any changes that should be made to the Disclosure Direction?   | No, Telstra does not believe that the Disclosure Direction should be varied as proposed by the ACCC. Please refer to Telstra's letter in response to the Consultation Paper for more detail.   |
| 10 | Should the Disclosure Direction require NBN Co to provide information on the average   | As noted above in response to question 4, Telstra does not consider that this is appropriate nor will provide the ACCC with useful information.  |

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|    | CVC to AVC ratio for each access seeker group (including by POI and by traffic class)?   |   |
| 11 | The Disclosure Direction currently does not require NBN Co to provide information on CVC utilisation rates as currently reported under the NBN SIO RKR. Should the Disclosure Direction be amended to require NBN Co to provide CVC utilisation rates? | As noted above in response to question 6, Telstra does not consider that it is appropriate to provide information on CVC utilisation. Please refer to Telstra's letter in response to the Consultation Paper for more detail. |
| 12 | On what basis should information on CVC utilisation be provided and disclosed (for example, on a peak and non-peak basis for each access seeker group, network access technology and POI)?   | As noted above in response to question 6, Telstra does not consider that it is appropriate to provide information on CVC utilisation. Please refer to Telstra's letter in response to the Consultation Paper for more detail. |
| 13 | Should the threshold for identification of an access seeker group for each network access technology be reduced from 5 per cent to 1 per cent, or by count of SIOs such as 1,000? Should this be applied on a POI basis?                               | Telstra does not have a view on this question.  |