

31 August 2012

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Dear Mr O'Leary

Telstra's Response to the Consultation Paper on the proposed Section 151DB list of Points of Interconnection to the National Broadband Network.

We welcome the ACCC's Final Consultation paper for stakeholders on NBN Co's POIs. Telstra has previously highlighted the importance of the location and number of POIs, maintaining that the number and location of the POIs are of critical importance to the future operation, functioning and structure of the telecommunications industry in Australia. We understand though that the intention of the current paper is not to seek comment on the location or number of the POIs, but instead to:

- provide stakeholders with a better understanding about changes to the POIs since the last list was published on the Commission's website in May 2011 and
- to receive comment on the form of the list published – particularly what information should be included and excluded from the public list.

Given the scope of this consultation, Telstra has sought to limit its comments to these two matters. Telstra notes though that it still has a number of reservations about the timeliness and adequacy of information being provided by NBN Co to RSPs about the POI rollout, and has also briefly provided comment on these matters below.

Telstra's Views on the Consultation Paper

Telstra appreciates the update from the Commission in relation to the POI list. We understand from this that the North Parramatta exchange POI is being relocated to Parramatta and that nine other NBN Co POIs are being relocated, and that these changes all satisfy the Commission's semi-distributed approach and Competition Criteria.

In relation to the proposed approach to the form of the list published, Telstra agrees that to ensure the security of infrastructure assets, the specific addresses of each POI should not be publicly notified. On that basis Telstra believes it is appropriate for interested parties to be required to enter into appropriate confidentiality arrangements with NBN Co to the extent necessary to gain access to the physical address and other POI details not included in the

public list. Telstra therefore supports the proposed public form of the list as set out in the Commission's Appendix A and the proposed confidential form of the list.

Other Matters relating to Information about NBN Co's POIs

Although Telstra does not have any substantive comments in relation to the reporting of the POI information, there still remains a number of outstanding issues in relation to the adequacy and timeliness of the information that is being provided to RSPs by NBN Co about its POIs. In particular, information covering the following matters is required:

- delays in the POI rollout process,
- timing of when POIs will be made available, and
- how long interim POIs will be used before the final POI is supplied.

This kind of information is crucial for RSPs as it affects RSP capital expenditure plans and the planning for deployment of infrastructure at the POIs. The absence of such information may result in unnecessarily long lead times for RSP infrastructure deployment at the POI, financial losses to the RSP, and delays in the delivery of services to end users where NBN Co's network has been rolled out. Telstra has recently engaged with NBN Co to resolve these matters, and remains hopeful that an appropriate and constructive resolution will be reached between NBN Co and RSPs.

If you have any queries in relation to this submission, please contact Kris Funston on 02 6129 4692 or at kris.funston@team.telstra.com.

Yours sincerely



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