



22 June 2009

Richard Home
General Manager
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Australian Competition and Consumer Commission

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Dear Mr Home

Submission on Fixed Services Review, Declaration inquiry for ULLS, LSS, PSTN OA, PSTN TA, LCS and WLR - Draft Decision

Wideband Networks appreciates the opportunity to provide comments in response to the ACCC's June 2009 Draft Decision in the Fixed Services Review. Wideband agrees with and supports the ACCC's draft decision to extend the declaration of each fixed service for a five year period.

Wideband Networks considers that continued declaration of these services is vital to competition in telecommunications markets. The ULLS, LSS, PSTN OA, PSTN TA, LCS and WLR remain enduring bottlenecks where Telstra controls access to the network and facilities necessary to provide services to end-users. Without declaration, Telstra's ability to impede the competitive aspirations of others in the market would increase significantly, to the point where there is a reasonable potential that Wideband would not be able to continue providing all services to consumers. We have no doubt that continued declaration shall promote the long term interests of end-users by allowing us and other competitive carrier's to provide diverse products at competitive rates to the Australian public.

We agree that the Government's National Broadband Network (**NBN**) announcement and its implementation will have a major impact in telecommunications markets. The ACCC has made the correct decision to extend declaration for the maximum five year period to allow continued competition during the transition towards the NBN.

Yours faithfully

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