



# Communications market report

2023–2024

December 2024



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Australian Competition and Consumer Commission  
Land of the Ngunnawal people  
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# List of acronyms

ACCC	Australian Competition and Consumer Commission
ACMA	Australian Communications and Media Authority
ADSL	asynchronous digital subscriber line
CCA	<i>Competition and Consumer Act 2010 (Cth)</i>
CPI	Consumer Price Index
CVC	connectivity virtual circuit
DSL	digital subscriber line
GB	gigabyte
GHz	gigahertz
HFC	hybrid fibre coaxial
LEO	low-Earth orbit
Mbps	megabits per second
MOCN	Multi-Operator Core Network
NBN	National Broadband Network
SAU	Special Access Undertaking
SMS	short messaging services
WBA	Wholesale Broadband Agreement
3G	third generation
4G	fourth generation
5G	fifth generation

# Annual advertised price changes in telecommunications services in Australia

June 2024 advertised prices collected by the ACCC from retailers' websites (during mid-2024) compared with June 2023 advertised prices, showing the nominal monthly advertised price excluding discounts for:

- 25th percentile (low-range price, where 25% of plans sampled are below this price)
- median (mid-range price, where this figure is middle value of our data set)
- 75th percentile (high-range price, where 75% of plans sampled are below this price).

## NBN fixed broadband – all plans

Download speed	Low-range price	Mid-range price	High-range price
12 Mbps	\$51 ▼14.2%	\$55 ▼15.4%	\$65 ▼13.3%
25 Mbps	\$65 ▼0.1%	\$69 ▼1.4%	\$71 ▼10.6%
50 Mbps	\$75 —flat	\$80 —flat	\$84 ▼1.2%
100/20 Mbps	\$85 ▼5.6%	\$90 ▼9.9%	\$95 ▼8.9%
100/40 Mbps	\$90 ▼10.2%	\$100 ▼8.3%	\$105 ▼7.1%
250 Mbps	\$100 ▼13.0%	\$110 ▼12.0%	\$119 ▼8.5%

## NBN fixed broadband – standard set of comparable products, 2023 to 2024

Download speed	
12 Mbps	▲\$5.33
25 Mbps	▲\$0.64
50 Mbps	▲\$3.19
100/20 Mbps	▼\$3.08
100/40 Mbps	▼\$6.97
250 Mbps	▼\$12.99

### Non-NBN fixed broadband

Download speed	Low-range price	Mid-range price	High-range price
12 Mbps	\$58 ▲2.6%	\$60 ▲0.1%	\$61 ▼0.4%
25 Mbps	\$64 ▼3.4%	\$69 ▼1.4%	\$71 ▼5.3%
50 Mbps	\$72 ▼3.4%	\$80 —flat	\$89 ▲5.7%
100/20 Mbps	\$89 ▼4.1%	\$90 ▼9.1%	\$101 ▼0.8%
100/40 Mbps	\$89 ▼11.0%	\$100 ▼4.8%	\$107 ▼2.7%
250 Mbps	\$99 ▼15.4%	\$110 ▼8.3%	\$129 ▼5.5%

### Mobile phone

Brand	Low-range price	Mid-range price	High-range price
Mobile network operator – flagship	\$45 ▲12.5%	\$55 ▼5.2%	\$67 ▼1.5%
Mobile network operator – sub-brands	\$25 ▲25.0%	\$31 —flat	\$40 —flat
Mobile virtual network operator	\$25 ▲25.0%	\$34 ▲13.3%	\$49 ▲22.5%

### Mobile broadband

Plan	Low-range price	Mid-range price	High-range price
All samples	\$22 ▲10.0%	\$40 ▲14.3%	\$58 ▲16.0%

## Advertised price approach to price monitoring

The ACCC's analysis uses advertised pricing from the month of June to estimate prices for telecommunications products. The data on market offers is drawn annually from Critical Information Summaries, which retailers publish on their websites. This means that the prices for legacy plans that customers may still be on are not considered.

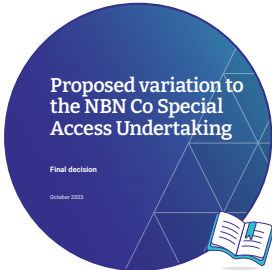
Prices used in the analysis are the ongoing price and do not include temporary discounts. Unless otherwise stated, pricing analysis does not take into account changes in product features, such as data allowances or other inclusions.

The broadband analysis in this report considers speed tiers and the network technology as major price differentiating factors. The mobiles analysis considers service provider type as the major pricing factor.

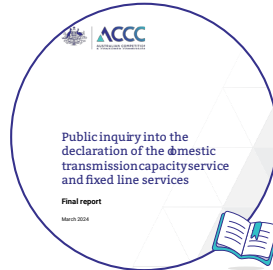
# Key market developments



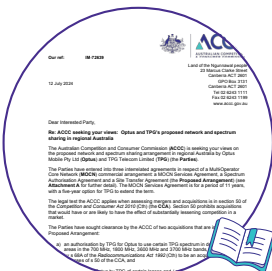
# Key ACCC projects



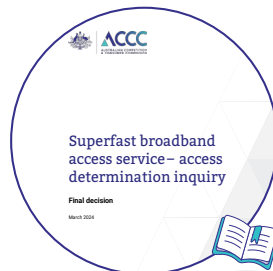
Acceptance of the Special Access Undertaking and implementation commences



Combined declaration inquiry continues towards access determinations



Assessment of the Optus and TPG Telecom regional network sharing arrangement



Superfast Broadband Access Service access determination finalised and amendments to the Deemed Functional Separation Undertaking



Measuring Broadband Australia – broadband retailers are continuing to deliver download speeds to consumers that are close to their maximum plan speed

# Executive Summary

This is the ACCC's annual report on Australian telecommunications markets for 2023–24. The report includes an overview of key market developments and identifies trends and emerging issues. It also assesses the changes in prices paid by consumers (using prices advertised by retailers as a measure) for telecommunications services and examines competitive safeguards within the telecommunications industry.

NBN Co's new Special Access Undertaking, which sets out new regulatory settings for the National Broadband Network (NBN), is now in effect and resulting in changes across the wholesale and retail sectors for broadband. The ACCC's recent declaration inquiry into whether wholesale services should be declared has also brought about some changes at the wholesale level, with the unconditioned local loop service and line sharing service declarations being allowed to expire on 30 June 2024.

Optus and TPG Telecom entered into a series of regional network sharing agreements, resulting in Optus having access to TPG Telecom's spectrum and being able to roll out its 5G coverage in more areas, while TPG Telecom's customers will have access to the Optus network in regional areas. There are also technological developments occurring, particularly in the low-Earth orbit satellite space, which have the potential to provide greater infrastructure competition, particularly in regional and remote areas.

With consumers increasingly having alternative options for their telecommunications services, it remains as important as ever for consumers to review their usage and to shop around for services that suit their needs and price point.

## New regulatory settings for the NBN drives change in the wholesale and retail market

NBN Co's varied Special Access Undertaking commenced in October 2023, following NBN Co further revising its proposal to obtain ACCC acceptance. The new Undertaking includes measures designed to protect consumers from sharp price rises, reduce barriers to entry for retailers and improve quality of services supplied over the NBN. It also provides a long-term price path towards efficient cost recovery.

Following acceptance of the varied undertaking, NBN Co and its retailers entered into a new 3-year wholesale agreement, which implements a number of important pricing and other initiatives consistent with the new regulatory settings. These include:

- An initial rebalancing of the costs to acquire residential grade Ethernet broadband access services – whereby the cost of the 50 Mbps speed tier increased, and the cost of higher speed tiers decreased.
- The introduction of a new low-cost access offer to support the supply of voice and voice-band data services, and designating the 25 Mbps speed tier as the entry level broadband access product.
- Setting a short timetable for completely removing volume-based charges from residential grade connectivity virtual circuits (CVC), to boost cost certainty for retailers. These charges were reset to zero for 100 Mbps and higher speed tiers and are being progressively reduced to zero for other speed tiers by 1 July 2026.

- Enhanced consultation requirements for NBN Co with retailers and end-users, aimed at identifying efficient measures to improve service quality and to consider the views of low income and digitally excluded end-users in product and pricing decisions.

Connectivity Virtual Circuit (CVC) is a virtual circuit that carries an access seeker's aggregated customer traffic over the NBN.

If an access seeker does not purchase sufficient CVC capacity, their customers' service speed can degrade, especially during busy evening hours.

A number of changes in the wholesale market have followed these regulatory and commercial developments, including:

- An increase in the number of wholesale access services that smaller and emerging retailers directly acquire from NBN Co, with over 1.67 million services acquired by smaller and emerging access seekers in June 2024, compared to 1.46 million in September 2023.
- A significant step up in the CVC capacity acquired by retailers, from around 3 Mbps per user in September 2023 to 6 Mbps per user in June 2024.
  - This capacity is a key mitigation of the risk of network congestion and poor experience for end-customers in the busy evening hours.
  - The large step up in CVC capacity also led to the NBN average network bandwidth congestion minutes falling to extremely low levels (see section 2.1.2 below).
- A shift in the mix of wholesale speed tiers to better align with speed tier demand in the retail market.

As a consequence of these market changes, the amount of CVC capacity purchased has grown significantly more than utilised capacity. This has contributed to a reduction in average network congestion on the NBN.

## Optus and TPG Telecom enter into regional network sharing arrangement, but the ACCC will continue to monitor the mobiles market

In April 2024, Optus and TPG Telecom announced 3 interrelated agreements regarding provision of mobile services in regional coverage areas. As part of these agreements, Optus will use certain TPG Telecom spectrum in regional areas to supply mobile services. In exchange, Optus will provide TPG Telecom and its customers with network services in those areas. TPG Telecom will transfer some of its mobile tower sites to Optus, while it will decommission others in areas serviced by the Optus network.

Optus will be able to access TPG Telecom's low-band and mid-band spectrum in regional areas as part of the agreement. This will enable Optus to provide additional capacity and coverage in regional areas and accelerate its 5G network rollout.

The ACCC did not oppose the proposed agreements on the basis that they are not likely to result in a substantial lessening of competition in affected markets, including the retail and wholesale mobiles markets. However, sustained price increases by mobile network operators over the past couple of years and Telstra's enduring market share dominance in regional, rural and remote areas are of concern to the ACCC.

The industry is experiencing numerous changes, with emerging technologies having the potential to disrupt the market and enable Optus and TPG Telecom to market their services to areas previously only served by Telstra. As such, the ACCC will continue to monitor changes to mobile prices, market shares and investments going forward.

## New satellite entrants increasing prospect of infrastructure competition

Low-Earth orbit (LEO) satellites are those that circle around the Earth at much lower altitudes (around 160 km to 2,000 km) than other satellites. A constellation of LEO satellites is required to provide continuous coverage of an area or for full coverage of Earth.

Developments in LEO satellites continued throughout 2023–24. This technology allows for higher data speeds and lower latency than geostationary satellites and has the potential to be a cheaper alternative to providing mobile coverage in regional and remote areas compared with terrestrial networks.

Some notable developments during the year included:

- Telstra announced it is exploring direct-to-handset capability via LEO satellites supplied by Lynk Global. Telstra also began retailing Starlink fixed voice and broadband internet services.<sup>1</sup>
- TPG Telecom announced a partnership with Lynk Global for direct-to-handset services.<sup>2</sup>
- Optus originally planned to launch direct-to-handset services in late 2024 (initially SMS only) after announcing a partnership with SpaceX in July 2023, but this has since been delayed.<sup>3</sup>
- Amazon announced Australia as one of the first countries in which it will trial its Project Kuiper LEO satellite service, with commercial services expected to launch in mid-2025.<sup>4</sup>

## Improved broadband speed performance observed, with additional transparency being established for service quality indicators

The Measuring Broadband Australia program observed new highs for download performance on NBN's fixed line and fixed wireless networks during this year. Changes in NBN Co's wholesale pricing and products led to further boosts in the key speed metrics for services supplied over the NBN, with busy hour speeds on NBN Co's very high speed services,<sup>5</sup> and the maximum speeds achievable on its Fixed Wireless Plus plan recording the strongest gains.<sup>6</sup> The average busy hour download speed across all NBN fixed line services was the highest in the program's history at 99.8% of plan

1 V Brady, '[Telstra announces organisational changes and action on cost; Provides early FY25 guidance and reaffirms FY24 guidance – Transcript](#)', Telstra, 21 May 2024, accessed 16 October 2024.

2 M Gabaji, '[TPG strikes satellite deal to erase mobile dead zones – a rural rescue or Optus rivalry?](#)', Finder, 28 August 2024, accessed 16 October 2024.

3 Optus, '[Together Optus and SpaceX Plan to Cover 100% of Australia](#)', 12 July 2023, accessed 16 October 2024.

4 Amazon, '[Better Delivery of Universal Services Discussion Paper – Amazon Project Kuiper's response](#)', 1 March 2024, accessed 16 October 2024.

5 ACCC, '[Measuring Broadband Australia – Report 24 – March 2024](#)', 27 March 2024, accessed 31 October 2024.

6 ACCC, '[Measuring Broadband Australia – Report 25 – June 2024](#)', 26 June 2024, accessed 31 October 2024.

speeds in June 2024, following consistent quarterly increases from previous highs throughout the year.<sup>7</sup> Consistent with these results, the number of average network bandwidth congestion minutes reported by NBN Co reduced significantly.<sup>8</sup>

In addition, the proportion of underperforming services continued to decline. These are services which do not come close to achieving the headline speeds for the chosen plan at any time of the day, due to limitations on the end-customer connection. By the end of June 2024 these accounted for 4.1% of NBN fixed line services monitored by the Measuring Broadband Australia program.

Importantly, increasing numbers of impacted consumers can now achieve the full speed of their chosen plan without incurring an upfront cost or commit to a higher cost plan. This is due to NBN Co modifying its fibre upgrade offers for impacted consumers within the relevant footprint. Previously impacted consumers could only downsize their retail plan to better align with the capability of their connection. The overall success of this initiative relies on competition in the retail market to raise consumer awareness and drive retailers and consequently NBN Co to migrate consumers efficiently onto upgraded network connections.

Under the varied Special Access Undertaking, NBN Co has engaged with access seekers and consumer groups around potential service improvements relating to the delivery of connections, fault rectification, speed assurance, network performance and availability, in addition to efforts to improve attainable speeds and service stability via its network upgrade programs. These enhanced consultation initiatives were created so that NBN Co could better target its service improvements throughout the initial regulatory cycle, as well as propose new benchmark service standards to apply in the next cycle, which is due to commence in July 2026.

The ACCC's new service quality and network performance record keeping rule for NBN Co, published in April 2024 and taking effect from 1 July 2024, will further improve transparency and accountability relating to the quality of services supplied over the NBN, and where there may be gaps between real world experience and expectations of end customers.<sup>9</sup>

## Smaller NBN retailers continue to make inroads in NBN services

Telstra (35%), TPG Telecom (20%) and Optus (12%) continue to hold the largest market shares of NBN retailers the ACCC captures in its Internet Activity reporting. However, smaller retail service providers have gradually expanded over the past few years – Aussie Broadband has grown to 7% of the NBN retail market (up from 6% 2 years ago) and Superloop has now reached 4% of the market.

Changes to how NBN retailers bundle products they offer resulted in a reduction in average advertised prices for new customers across all speed tiers in 2023–24 (for example, previously bundled inclusions are now presented as add on products, reducing the cost of the 'baseline' offering). However, ACCC analysis of a subset of advertised plans offered by the major retailers available in both 2023 and 2024 demonstrated that average advertised prices for 12 Mbps, 25 Mbps and 50 Mbps product offerings increased in 2023–24, while prices for the 100 Mbps and above tiers decreased.

Retail NBN offers at the 50 Mbps speed tier remained the most popular, despite pricing and other incentives provided to retailers and consumers to shift towards more expensive offers.

After weighting advertised prices according to the number of each retailers' reported customers on each speed tier, ACCC analysis showed that, on average, customers on a 50 Mbps plan are likely to

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7 ACCC, '[Measuring Broadband Australia – Report 25 – June 2024](#)', 26 June 2024, accessed 31 October 2024.

8 NBN Co, '[Monthly Progress Report](#)', June 2024, accessed 31 October 2024.

9 ACCC, '[NBN service quality and network performance record keeping rule](#)', 5 April 2024, accessed 27 November 2024.

be paying around \$88 per month, significantly above the unweighted average advertised plan price of \$80.

Speed is not the only consideration consumers make when selecting their NBN retail service provider. Consumers can also consider the overall value of the product offering, by taking into account things like customer service and add on products. The ACCC's analysis suggests that, like many essential services sectors the ACCC examines, there are likely to be some customers who would benefit from periodically shopping around to determine the best value, most suitable NBN retail offering for their needs.

## Home wireless broadband popularity growing

Home wireless broadband is a type of fixed wireless service, delivered over existing mobile networks.

Consumer uptake of home wireless broadband, which is delivered over mobile networks, has increased by 60% since 2022 and now accounts for 58% of non-NBN services in operation, and 6.6% of all broadband services, reported under the Internet Activity record keeping rule (up from 45% and 4.2% respectively since June 2022). It has become an attractive broadband option for consumers that can access it, with mobile network operators marketing it as an alternative to NBN and other fixed line broadband.

Home wireless broadband's popularity has grown. It is comparable in price, speed and data allowances relative to fixed broadband plans and it can be a very effective substitute for fixed line broadband for some. However, it is important to note that home wireless broadband is not available to all consumers. Its availability is determined by the location of mobile network towers, which may not provide suitable coverage in regional and remote areas. Further, the service can be subject to varied speeds, depending on tower capacity and whether it has 4G or 5G coverage.

## Prices for mobile network operators' flagship plans continue to rise, with the number of pre-paid service offerings falling

Advertised prices of the mobile network operator's flagship brand post and pre-paid plans increased in 2023–24, following trends from recent years.

Despite recent increases in pre-paid mobile subscribers, the number of pre-paid plans offered by the mobile network operators' flagship brands (Telstra, Optus and Vodafone) decreased, suggesting the mobile network operators are moving towards a consolidated number of service offerings. This reduction in offerings caused a mild reduction in the median advertised price for the mobile network operators' flagship brands. Despite this decline, the median advertised prices for the mobile network operators' flagship brands remain significantly higher than those of its sub-brands (e.g. Belong and Amaysim) and mobile virtual network operators.

Our analysis suggests that consumers continue to not use a significant portion of their data allowances under their mobile plans. We estimate that the average advertised data allowance for mobile plans (pre-paid and post-paid) was around 68 GB per month, but that consumers are only using around 14.2 GB per month, or only around 20% of the average monthly allowance.

This suggests that consumers may benefit from exploring other plans that are available, at lower price points, with less data included, or both, to obtain better value in their mobile plans. However, consumers should check mobile coverage of any potential provider to ensure it suits their needs.

## The ACCC's combined declaration inquiry examined whether wholesale services should continue to be regulated

Throughout 2023–24, the ACCC conducted a combined declaration inquiry into whether 9 wholesale telecommunications services should continue to be regulated. The inquiry considered whether ongoing regulation of these services would promote the long-term interests of end-users and if any changes to these regulations are appropriate.

The ACCC's final positions were to:

- Extend the declaration of the domestic transmission capacity service for a further 5 years and vary the service description to reflect technological changes since the last declaration inquiry.
- Extend the declarations of the resale fixed line services (local carriage service, wholesale line rental and wholesale asymmetric digital subscriber line) for a further 5 years without changes to the service descriptions.
- Extend the declarations of the fixed originating and terminating access services for a further 5 years and vary the service descriptions to reflect the industry trends towards IP-based interconnection.
- Extend the declaration of the mobile terminating access service for a further 5 years with no amendments to the service description.
- Allow the declarations of the unconditioned local loop and line sharing services to expire without making a new declaration.

We considered that declaration of the unconditioned local loop service and line sharing service is no longer necessary to promote the long-term interests of end-users. This is due to the very low number of services in operation and the availability of services such as wholesale Asymmetric Digital Subscriber Line (ADSL) and the resale fixed voice services, which access seekers can use to provide plain old telephone services and ADSL services to end-users over Telstra's customer access network.

The ACCC has commenced 3 separate final access determination inquiries to consider price and non-price terms and conditions of the 7 services that remain declared following the combined declarations inquiry. This work will continue throughout 2024–25.

# 1. Introduction

The Australian Competition and Consumer Commission (ACCC) releases the Communications market report every year. The report details recent competitive safeguard activities in the Australian telecommunications industry and the prices paid by consumers for telecommunications services, as required by the *Competition and Consumer Act 2010* (CCA). As discussed above, the ACCC uses advertised pricing from the month of June to estimate prices for telecommunications products.

The ACCC has a broad role in the Australian telecommunications sector, including competition and access functions, responsibilities relating to the NBN, monitoring and reporting, and compliance work under the CCA and other telecommunications-specific legislation.

The structure of this report is as follows:

- Chapter 2 highlights the key developments from the last year that have influenced both the markets and the ACCC's work in communications.
- Chapter 3 sets out retail pricing and consumer trends for the 2023–24 financial year.
- Chapter 4 reviews the ACCC's engagement in the telecommunications sector in 2023–24 and outlines ACCC actions that have been taken to safeguard both competition and consumers.

Telecommunications, as an essential service, remains an ACCC compliance and enforcement priority.

## 2. Key market developments

### 2.1 New NBN regulatory settings drive changes

NBN Co's SAU provides the overarching framework for NBN regulation. However, the full contractual terms under which NBN Co provides wholesale services to its customers (i.e. retailers and other access seekers) are set out in a commercial agreement between NBN Co and these customers, known as the Wholesale Broadband Agreement.

In October 2023 the ACCC accepted NBN Co's latest variation to its Special Access Undertaking (SAU), which includes measures designed to protect consumers from sharp price rises, reduce barriers to entry for new retailers and create incentives to fix systemic issues that drive poor NBN consumer experience.

The SAU sets the rules for how broadband providers will access the NBN over the coming decades and will apply until 2040.

The SAU led to the adoption of a new Wholesale Broadband Agreement (known as WBA5) between NBN Co and retail service providers, which commenced on 1 December 2023. It is a 3-year agreement that introduced several improvements for retail service providers and customers.

#### 2.1.1 NBN wholesale price changes under WBA5

The new Wholesale Broadband Agreement introduced the following wholesale price changes:

- a new basic voice and data usage service at around half the price of NBN Co's previous entry-level broadband offer (reduced in price from \$22.50 to \$12 per month)
- lower prices for the 25 Mbps and the 100 Mbps or faster speed tier offers
- an increase of \$5 per month in the minimum price of the 50 Mbps offer
- the removal of capacity-based charging on higher speed services.

The revised SAU allows NBN Co to gradually increase its wholesale pricing until its annual revenues reach its efficient costs of supply, expected in 2030. This is on the condition that its weighted average access price does not increase by more than CPI each year and that no individual residential grade access price increases by the higher of CPI or 5% per annum.<sup>10</sup>

NBN Co's most recent wholesale price changes announced on 1 May 2024 to apply for 2024–25 are within the maximum increases allowed under the SAU. The lower speed services (50 Mbps and less) increased by close to the maximum individual price cap allowances. However, higher speed services (100 Mbps or more) increased by less than permitted and in some cases fell substantially from the maximum prices that applied in 2023–24. Prices for many other wholesale access services offered by NBN Co, including business, satellite, network interface and miscellaneous installation, activation and service charges, will not change.

<sup>10</sup> NBN Co's residential Entry Level Offers cannot increase by more than the CPI.

The average wholesale price paid by retailers to access the NBN to supply households, measured by NBN Co's average revenue per residential user, remained about the same between 2022–23 and 2023–24 at \$47 per month.<sup>11</sup>

However, because retailers purchase a different mix of wholesale services, they will have experienced different changes in their costs of accessing the NBN. This mix is expected to have contributed to the different retail pricing changes across retailers and influences retail competition. More specifically, there is evidence of increased sale of, and competition in the supply of, higher speed retail services due to the reduction in the wholesale price of these services. This is discussed further in Chapter 3 below.

## 2.1.2 Removal of some capacity charges has changed retailers' wholesale strategies

Connectivity Virtual Circuit (CVC) is a virtual circuit that carries an access seeker's aggregated customer traffic over the NBN.

If an access seeker does not purchase sufficient CVC capacity, their customers' service speed can degrade, especially during busy evening hours.

Under the new WBA5 pricing structure, volume-based capacity charges (known as "CVC") were removed from 100 Mbps and higher offers from 1 December 2023. NBN Co will progressively reduce CVC capacity charges on 50 Mbps and below offers each year, prior to withdrawing them completely from mid-2026.

This change has significantly altered retailers' CVC capacity acquisition strategies. Prior to WBA5, retailers acquired CVC to optimise their costs, having regard to expected customer utilisation and their marketing claims. However, WBA5 pricing significantly reduces the incentive for retailers to minimise CVC acquisition and potentially risk busy hour congestion on their networks. This is due to the removal of CVC charges from higher speed services (100 Mbps and above), and additional measures to boost cost certainty for retailers when acquiring other speed services, pending CVC charges being removed more widely by 1 July 2026.

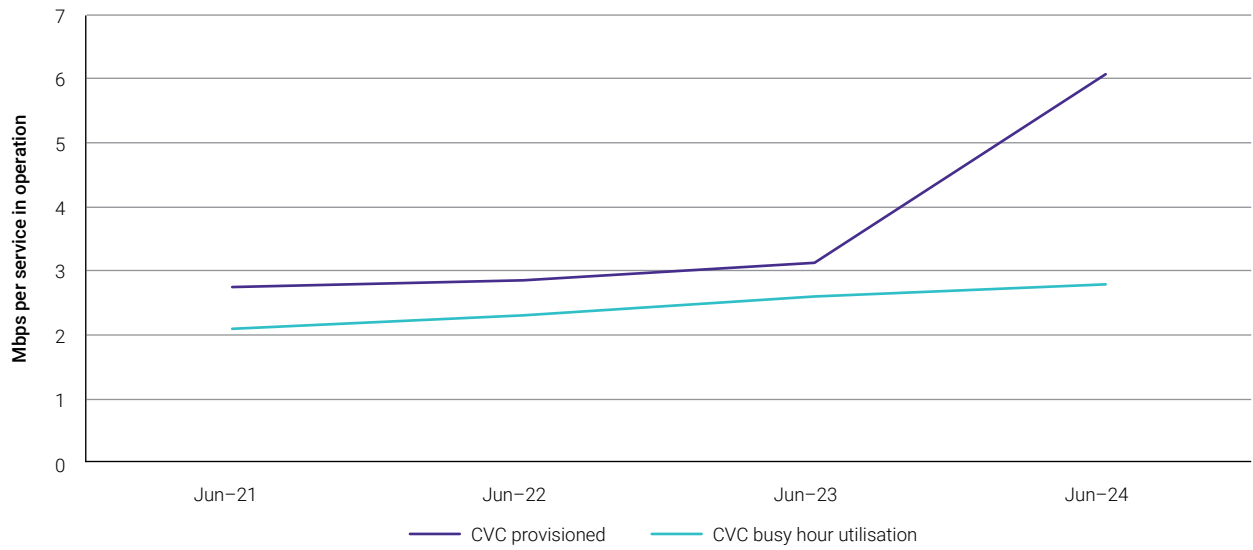
Figure 1 below shows that NBN traffic class 4 fixed line and fixed wireless CVC provisioning per service now significantly exceeds the amount of CVC utilised per service following the change in NBN Co's wholesale pricing model.

Busy hour CVC utilised per service has grown fairly constantly at between 8% and 13% over the past 3 years. This reflects improvements in data efficiency of applications used in peak hours, notably streaming services. Some of the reduction in the rate of growth reported by NBN Co in FY24 is likely due to the change in the basis of measurement and should be regarded as an estimate only.

The significantly higher growth in CVC provisioned compared to the growth in busy hour CVC utilisation in FY24 has also contributed to the number of average network bandwidth congestion minutes reported by NBN Co, falling to extremely low levels since the introduction of WBA5 (see Figure 2 below).

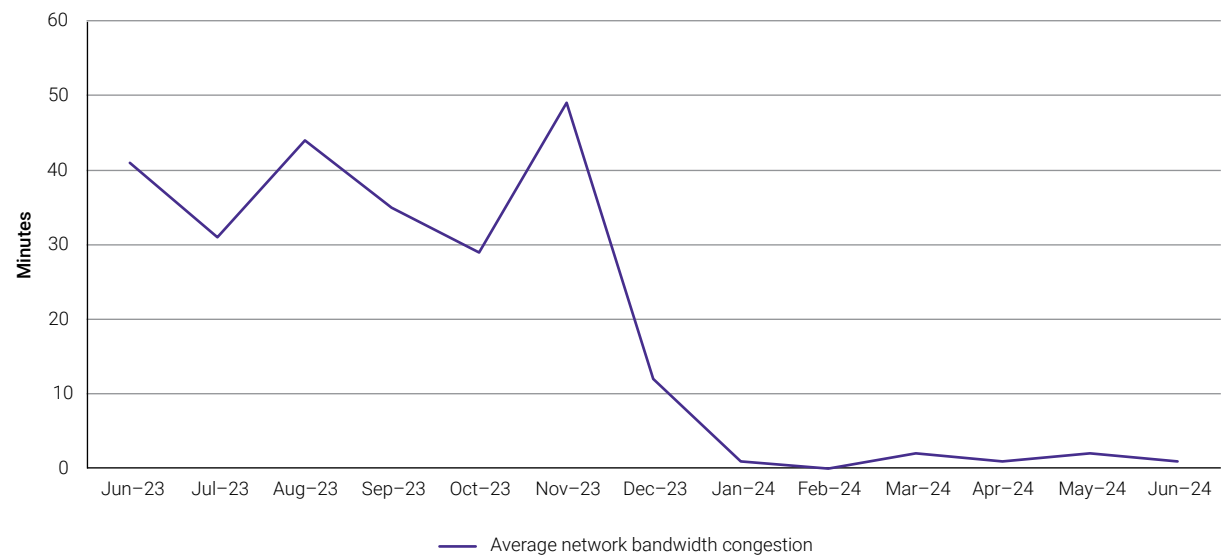
11 NBN Co, ['FY24 Financial Results presentation'](#), 13 August 2024, p 11, accessed 31 October 2024.

**Figure 1: NBN CVC provisioned and CVC busy hour utilisation per service in operation**



Sources: [ACCC NBN Wholesale Market Indicators Reports](#) (CVC provisioned) and NBN Co data supplied to ACCC (CVC busy hour utilisation). Busy hour utilisation for FY24 is measured at Connectivity Serving Area peaks rather than CVC peaks used in prior years.

**Figure 2: NBN average network bandwidth congestion**



Source: [NBN Co Monthly Progress Reports](#).

### 2.1.3 NBN Co expands the availability of higher speed services and has committed to enhanced consultation with retailers and end-users over service quality improvements

There is increased transparency of NBN Co's service improvement initiatives and service performance data under the new SAU. For example, NBN Co's Annual Service Improvement Plan (covering FY24) identified initiatives to improve service quality, service delivery and communication with retail service providers. NBN Co also published its first Annual Service Performance Review in June 2024.<sup>12</sup>

NBN Co has also continued to invest heavily in network expansion or augmentation, with a view to increasing speed performance and other quality measures. These include:

- increasing the reach of higher download speeds over its fibre to the home and hybrid fibre coaxial networks (up to 1 Gbps)
- reducing barriers to eligibility for upgrades to the fibre-to-the-premises network with no upfront cost for never-connected premises, and for end customers impacted by underperforming lines or with recurring faults on their existing copper services
- upgrading the fixed wireless network to increase capacity and coverage for services in regional and rural Australia with corresponding increases in maximum attainable speeds.

### 2.1.4 Underperforming NBN services at a record low, but improvements have slowed

Underperforming NBN services are those that rarely or never achieve speeds that approach the maximum plan download speed. These services represented 4.1% of the NBN fixed line services tested in Report 25 of the ACCC's Measuring Broadband Australia program.<sup>13</sup> While this is the lowest figure in the program's history, the rate at which underperforming services are reducing has slowed in recent years.

Fibre-to-the-node is more likely to underperform than other NBN technologies. The number of consumers on underperforming fibre-to-the-node connections that are on NBN 100 Mbps plans remains relatively high.<sup>14</sup> Underperformance impacts 7% of regional consumers with fixed line connections compared to 4% of their urban counterparts, with a higher proportion of regional consumers connected via fibre-to-the-node.<sup>15</sup>

As indicated above, NBN Co has removed the requirement for an end-user to order a higher speed tier when requesting a fibre-to-the-premises upgrade where the end-user has an underperforming line or is eligible for an upgrade as part of the assurance fibre upgrade program.

Fibre upgrades are being offered to fibre-to-the-node and fibre-to-the-curb premises within NBN Co's fibre upgrade footprint not capable of download speeds of 25 Mbps, and premises not capable of 50 Mbps download speeds that have experienced sustained dropouts or experienced multiple truck rolls in the last year. End-users should experience service quality improvements associated with proposed fibre upgrades once they are successfully connected to the fibre network. The overall success of this initiative relies on competition in the retail market to raise consumer awareness and drive retailers and NBN Co to migrate consumers efficiently onto upgraded network connections.

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12 NBN Co, '[Annual Service Performance Review](#)', June 2024, accessed 31 October 2024.

13 ACCC, '[Measuring Broadband Australia – Report 25 – June 2024](#)', 26 June 2024, accessed 31 October 2024.

14 ACCC, '[Measuring Broadband Australia – Report 24 – March 2024](#)', 27 March 2024, accessed 31 October 2024.

15 ACCC, '[Measuring Broadband Australia – Report 23 – December 2023](#)', 12 December 2023, accessed 31 October 2024.

## 2.2 Sustained price increases in the mobile market

Consistent with pricing trend in recent years, the national mobile network operators increased the prices of their post-paid flagship brand mobile plans during 2023–24.

- In July 2023, Telstra increased the prices of its post-paid plans (by around 7%) in line with its annual CPI-linked pricing adjustments and increased the data allowance on some plans.<sup>16</sup> This increase followed similar CPI-linked price increases in July 2022.<sup>17</sup> However, in May 2024, Telstra announced it was stepping away from a similar annual CPI-linked price review in 2024.<sup>18</sup> In July 2024, Telstra announced that the prices of its post-paid services would increase by between \$2 and \$4 from August 2024.<sup>19</sup> For most of the plans the price increases were not accompanied by increases in data allowance.
- TPG Telecom announced in January 2024 that its flagship Vodafone brand had raised prices by between 6% and 9% for new post-paid customers.<sup>20</sup> Data allowances for these plans also increased. In March 2024, TPG Telecom further announced a \$4 per month price increase for its existing customers on Vodafone-branded post-paid mobile plans (effective from mid-April 2024).<sup>21</sup>
- In May 2024, Optus increased the prices of its monthly post-paid plans and offered higher data allowances. This represented a price increase of 5–6% for new customers. This was followed by an announcement in June 2024 that Optus would move existing customers onto these new plans from August 2024, which, in many cases, are more expensive than existing plans.<sup>22</sup> Optus also reduced the price of its most expensive monthly post-paid plan.<sup>23</sup>

All 3 national mobile network operators also increased the prices of their pre-paid mobile plans in 2023–24, often with an accompanying increase in data allowances which remain well above the average monthly data usage.<sup>24</sup> There were also price increases with respect to some sub-brands offered by the mobile network operators, such as Belong and Amaysim, and services offered by some mobile virtual network operators, such as Aussie Broadband and ALDI mobile.<sup>25</sup>

These sustained price increases have a significant impact on consumers because 88% of end-users have a post-paid or pre-paid plan with one of the national mobile network operators (such as Telstra, Optus or Vodafone).

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16 T Donnelly, '[Telstra to hike mobile plan prices from July](#)', Canstar Blue, 16 May 2023, accessed 16 October 2024.

17 T Donnelly, '[Telstra confirms phone plan prices will rise in July](#)', Canstar Blue, 3 June 2022, accessed 16 October 2024.

18 V Brady, '[Telstra announces organisational changes and action on cost; Provides early FY25 guidance and reaffirms FY24 guidance – Transcript](#)', Telstra, 21 May 2024, accessed 16 October 2024.

19 B Whitcomb, '[We're making some changes to our mobile pricing this year, here's why](#)', Telstra, 9 July 2024, accessed 16 October 2024.

20 J Gearie, '[Vodafone's just hiked the prices on its phone plans – are they still good value?](#)', Techradar, 15 January 2024, accessed 16 October 2024.

21 J Gearie, '[Vodafone is increasing some mobile plan prices by AU\\$4, so I've found some more lucrative options](#)', Techradar, 6 March 2024, accessed 16 October 2024.

22 A Choros, '[Optus upping mobile plan prices for some existing customers](#)', Whistle Out, 13 June 2024, accessed 16 October 2024.

23 A Choros, '[Optus' mobile plans just got more expensive for most new customers](#)', Whistle Out, 27 May 2024, accessed 16 October 2024.

24 B Whitcomb, '[We're making some changes to our mobile pricing this year, here's why](#)', Telstra, 9 July 2024, accessed 16 October 2024; Optus, '[Adverse Change Register](#)', n.d., accessed 16 October 2024; A Choros, '[Vodafone increasing prepaid prices in April](#)', Whistle Out, 12 March 2024, accessed 16 October 2024.

25 A Choros, '[Belong's cheapest mobile plans are getting more expensive at the end of July](#)', Whistle Out, 28 June 2024, accessed 16 October 2024; D Crismale, '[amaysim plans set to get more expensive from December](#)', Whistle Out, 30 October 2023, accessed 16 October 2024; T Donnelly, '[Aussie Broadband raises plan prices for mobile customers](#)', Canstar Blue, 16 August 2023, accessed 16 October 2024; Aldi Mobile, '[Our plans are changing](#)', n.d., accessed 16 October 2024.

Additionally, the mobile network operators removed a significant number of pre-paid plans on offer.<sup>26</sup> This reduction in available plans could, in some cases, force consumers onto a higher priced plan, causing an even higher price increase compared to those consumers whose plan remained on offer (but at a higher price). The reduction in available plans has contributed to a reduction in the overall median advertised price for mobile network operator plans on their flagship brands (discussed further in Chapter 3).

Similar to observations made in previous years' reports, it is unclear the extent to which consumers value the higher data allowances offered in return for higher prices. The data allowances offered by the national mobile network operators, even on low-range plans, are generally well above the average monthly reported post-paid and pre-paid data usage. The data allowance for the low-range post-paid plan for all 3 mobile network operators is now 50 GB.<sup>27</sup> For the 3 months ended June 2024, the average monthly data usage for retail post-paid customers was 18.1 GB.

## 2.3 Technological and other developments in mobile infrastructure

### 2.3.1 Optus & TPG Telecom entered into agreements for provision of mobile services in regional areas

Optus and TPG Telecom entered into 3 agreements that relate to the provision of mobile services in certain regional coverage areas.

As a result of the agreements, Optus will use certain TPG Telecom spectrum in regional areas to supply mobile services and Optus will in turn provide TPG Telecom with network services. TPG Telecom will decommission most of its sites in areas it can access Optus's network, while some will be transferred to Optus.

Optus benefits from the agreements principally from being able to access TPG Telecom's low-band and mid-band spectrum in regional areas. For this, Optus will pay TPG Telecom estimated fees of \$420 million over 11 years. Over the same period, Optus will earn around \$1.59 billion in revenues from TPG Telecom for providing it with network services in regional areas.<sup>28</sup>

Increased spectrum will enable Optus to provide additional capacity and coverage in regional areas. Optus will also accelerate its 5G network rollout as a result of the agreements, bringing forward the completion of its regional 5G network to the end of 2030 instead of 2032. TPG Telecom will use the network services supplied by Optus to offer 4G and 5G retail and wholesale services in those regional areas.

### The ACCC will be monitoring the impacts of these agreements on the mobiles market

The ACCC did not oppose the proposed agreements on the basis that they are not likely to result in a substantial lessening of competition in affected markets, including the retail and wholesale mobiles markets.

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26 B Whitcomb, '[We're making some changes to our mobile pricing this year, here's why](#)', Telstra, 9 July 2024, accessed 16 October 2024; Optus, '[Adverse Change Register](#)', n.d., accessed 16 October 2024; A Choros, '[Vodafone increasing prepaid prices in April](#)', Whistle Out, 12 March 2024, accessed 16 October 2024.

27 As at 31 August 2024.

28 TPG Telecom, '[TPG Telecom signs regional network sharing agreements with Optus](#)', 29 April 2024, accessed 2 December 2024.

During the term of the agreements, there is potential for competition in the mobiles market to be enhanced and lead to better outcomes for consumers. It is likely that TPG Telecom being able to provide services over a much larger geographic coverage area would result in increased competition in the retail mobile market by providing increased choice of service providers for consumers who value higher levels of coverage (including 5G coverage) in regional and rural areas.

Therefore, the ACCC considered the agreements will overall likely make Optus and TPG Telecom stronger and closer competitors with each other and, importantly, with Telstra in retail and wholesale mobile markets. It is possible that the agreements may also elicit a competitive response from Telstra in the form of lower prices and/or increased infrastructure investment compared to a scenario without the agreements in place.

On the other hand, the ACCC considers that much of the building blocks of Telstra's dominance will remain, despite these agreements by Optus and TPG Telecom. Telstra's competitive advantage would likely remain in regional areas by virtue of its dominant market shares with low rates of churn. Telstra would continue to have the greatest number of mobile sites and terrestrial coverage advantage, and it would also remain well ahead in the deployment of 5G.

The trend of sustained price increases by mobile network operators over the past couple of years and Telstra's enduring market share dominance in regional, rural, and remote areas are of concern to the ACCC. However, there is a possibility that the increased overall strength of Optus and TPG Telecom relative to Telstra because of these arrangements will impact this trend. In addition, the ACCC notes the potential for emerging technologies as such as LEO satellites to further disrupt the market and enable Optus and TPG Telecom to market their services to areas previously only served by Telstra. Market developments in relation to LEO satellite services are discussed below.

In light of the Optus and TPG Telecom agreements, the ACCC will continue to monitor changes to mobile prices, market shares, and investments going forward.

### **2.3.2 New LEO satellite entrants increasing prospect of infrastructure competition**

Low-Earth orbit (LEO) satellites are those that circle around the Earth at much lower altitudes (around 160 km to 2,000 km) than other satellites. A constellation of LEO satellites is required to provide continuous coverage of an area or for full coverage of Earth.

By orbiting closer to Earth, LEO satellites allow for higher data speeds and lower latency than traditional geostationary satellites. They may also provide a cheaper alternative to providing mobile coverage in regional and remote areas compared to terrestrial networks.

During 2023–24, developments in service offerings using LEO satellite technology continued apace.

Starlink has continued to grow its Australian customer base, after launching here in 2021. Starlink reported over 200,000 Australian customers in March 2024.<sup>29</sup> This has grown to over 250,000 Australian customers as of July 2024.<sup>30</sup>

<sup>29</sup> Starlink, @Starlink, '[Starlink is now connecting more than 200K customers and counting across Australia](#)', 5 March 2024, accessed 28 October 2024.

<sup>30</sup> Starlink, @Starlink, '[Starlink now serves high-speed internet to more than a quarter million active Aussie customers, connecting ~2.5% of homes across Australia!](#)', 27 July 2024, accessed 28 October 2024.

Telstra has announced that it is exploring and testing direct-to-handset capability with Lynk Global as way to extend its mobile coverage.<sup>31</sup> TPG Telecom has also announced a partnership with Lynk Global for direct-to-handset services, starting with SMS trials in 2025.<sup>32</sup>

In July 2023, Optus announced a partnership with Starlink to trial the integration of LEO satellites with its terrestrial mobile network to provide direct-to-handset services.<sup>33</sup> However, Optus's plans to cover 100% of Australia from late 2024 onwards appear to have been delayed because SpaceX, which owns Starlink, is reported to be facing US regulatory delays.<sup>34</sup>

In the fixed broadband and voice services market, Telstra began reselling Starlink voice and broadband internet services to regional and remote business customers in late 2023 and began offering these services to residential customers in March 2024.<sup>35</sup> Vocus has also commenced selling Starlink broadband services to business and government entities.<sup>36</sup>

Eutelsat and Telstra announced the largest roll out of OneWeb LEO satellite backhaul in Australia in February 2024. The OneWeb LEO satellites will provide upgraded backhaul to more than 300 remote Telstra mobile sites in the next 18 months and improve mobile reliability in areas where terrestrial backhaul is susceptible to natural disasters.<sup>37</sup>

In June 2024, Amazon announced Australia will be one of the first countries to host a demonstration site for its Project Kuiper LEO satellite service. Australian customer trials are expected to start in late 2024, with commercial services to follow in mid-2025.<sup>38</sup> Amazon will operate as an internet service provider in Australia and can support other carriers with backhaul services to extend and in-fill their own terrestrial network coverage areas.<sup>39</sup>

### 2.3.3 Mobile network operators shut down 3G networks

Telstra, Optus and TPG Telecom have all shut down their 3G networks. TPG Telecom closed its network first, commencing in December 2023 and completing the closure in January 2024. Telstra and Optus both closed their 3G networks as of 28 October 2024, after extending their initial planned closure dates earlier in the year.<sup>40</sup> The delay of Telstra's and Optus's 3G network shutdown was a result of the need to undertake additional work to address significant concerns regarding the impact of the shutdown on mobile devices that are dependent on 3G technology. These included, in particular, some 4G mobile phones that rely on 3G networks to make emergency calls.

The shutdown of the 3G networks enabled all 3 mobile network operators to repurpose some of their spectrum that was originally used for 3G technology for 4G and/or 5G technologies. Telstra has stated that closing its 3G network will enable it to expand its 5G coverage in regional and remote

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31 V Brady, '[Telstra announces organisational changes and action on cost; Provides early FY25 guidance and reaffirms FY24 guidance – Transcript](#)', Telstra, 21 May 2024, accessed 16 October 2024.

32 M Gabaji, '[TPG strikes satellite deal to erase mobile dead zones – a rural rescue or Optus rivalry?](#)', Finder, 28 August 2024, accessed 16 October 2024.

33 Optus, '[Together Optus and SpaceX Plan to Cover 100% of Australia](#)', 12 July 2023, accessed 16 October 2024.

34 T Long, '[EXCLUSIVE: Optus' plans for 100% mobile coverage of Australia delayed by SpaceX and US Regulators](#)', EFTM, 7 September 2024, accessed 16 October 2024.

35 B Whitcomb, '[Telstra Satellite home internet with Starlink is here – here's what you need to know](#)', Telstra, 25 March 2024, accessed 16 October 2024.

36 Vocus, '[Vocus Satellite – Starlink](#)', n.d., accessed 16 October 2024.

37 Business Wire, '[Telstra and Eutelsat OneWeb Launch Largest Deployment of LEO Backhaul in Australia](#)', 12 February 2024, accessed 16 October 2024.

38 Talk Satellite Asia-Pacific, '[Amazon reveals Australian launch plans for Project Kuiper](#)', n.d., accessed 16 October 2024.

39 Amazon, '[Better Delivery of Universal Services Discussion Paper – Amazon Project Kuiper's response](#)', 1 March 2024, accessed 16 October 2024.

40 Telstra initially planned to close its 3G network on 30 June 2024, then at the end of August. Optus initially planned to close its 3G network in September 2024.

Australia, using the 850 MHz spectrum previously used to deploy its 3G network.<sup>41</sup> Optus has also stated that it will be able to re-direct low-band spectrum previously used for its 3G network for 4G and 5G services post-3G shutdown.<sup>42</sup> TPG Telecom had already redeployed its 2100 MHz spectrum band used for 3G metropolitan services for use in its 4G network, with its remaining 3G spectrum (900 MHz) expiring in June 2024.<sup>43</sup> TPG Telecom’s customers will also gain access to additional 4G and 5G coverage in regional areas, as part of the regional network and spectrum sharing agreements with Optus discussed above.

### 2.3.4 Home wireless broadband adoption continues to rise

Home wireless broadband is a type of fixed wireless service, delivered over existing mobile networks.

Home wireless broadband has seen increasing uptake in recent years and has become an attractive broadband option for consumers, accounting for 58% of non-NBN broadband connections (6.6% of all broadband services) reported in the Internet Activity record keeping rule in 2023–24. This data does not account for the reported over 250,000 Starlink customers, which will be included in future Internet Activity record keeping rule collections (discussed in section 3.2.1).

Mobile network operators have marketed home wireless broadband as an alternative to the NBN or other fixed line broadband.<sup>44</sup> While home wireless broadband can provide a substitute service, as the price, speed and data allowance of these plans are comparable to fixed broadband plans. However, there are some key differences in terms of services it can support, such as not supporting fixed telephony, security or personal alarms or remote server access, or other services highly sensitive to latency (e.g. specialist applications).

Home wireless broadband is not available to all consumers, with access subject to mobile network tower locations and capacity. Mobile network operators market home wireless broadband as either 4G and 5G, with different speed limits for each depending on the technology and any speed caps. However, these speeds can be quite varied and shift over time, as networks become more heavily utilised or network deployments are improved. Speed claims made in respect of uncapped plans have also declined over time.

41 Telstra, [‘Submission to the Senate Standing Committee on Rural and Regional Affairs and Transport References Committee’s inquiry into the shutdown of the 3G Mobile Network’](#), 31 May 2024, p 7.

42 Optus, [‘Submission to the Senate Rural and Regional Affairs and Transport References Committee – shutdown of the 3G mobile network’](#), May 2024, p 4.

43 ARN, [‘TPG Telecom confirms 3G switch off date’](#), 27 September 2022, accessed on 18 October 2024.

44 For example: Telstra, [5G Home Internet](#), accessed on 22 October 2024; Optus, [4G Home Internet](#), accessed on 22 October 2024.

### 2.3.5 Technology changes to telecommunications in regional areas

Overall, 2023–24 saw continuing change for regional and remote telecommunications, across mobile, fixed phone lines and broadband. Changes are being driven by significant shifts in the ownership and availability of infrastructure and new technologies, and are highly likely to have implications for competition and market structures going forward.

The NBN fixed wireless network saw some expansion in 2023–24, as part of NBN Co's enhancements to the network, improving the availability of fast and low-latency broadband. NBN Co is planning to expand this network to cover an additional 120,000 premises that were previously or currently designated as NBN satellite areas.<sup>45</sup>

LEO satellite technologies have had an increasing impact in the regional market, with Starlink offering a high-speed internet alternative for regional consumers. Telstra has also begun retailing a Starlink service for regional customers, with broadband and fixed voice services available.<sup>46</sup> While Optus did not launch its direct-to-mobile services in collaboration with SpaceX in 2024 as originally planned, it is expected the future roll out of direct-to-device services will likely significantly extend mobile coverage for regional consumers.<sup>47</sup>

ADSL connections using Telstra's copper network (of which the majority is in regional areas) continue to decrease, and Telstra exited the retail market for these services in 2024. Telstra's wholesale ADSL product is still available through other retailers, although this isn't offered by most of the major retailers.

The closure of 3G networks has affected regional customers that rely on specialised equipment or services used in these areas. Consumers who relied upon repeater units or Next Generation Wireless Link services have needed to make significant change beyond upgrading handsets. Those with 3G-only repeaters or antennas needed upgrading to enable 4G signals, while customers using fixed voice lines and broadband that relies upon Next Generation Wireless Link services have had to work with Telstra for an alternative option.<sup>48</sup>

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45 NBN Co, '[UPGRADES TO nbn@ FIXED WIRELESS](#)', accessed 6 November 2024.

46 Telstra, '[Telstra announces agreement with Starlink](#)', 3 July 2023, accessed 6 November 2024.

47 Optus, '[Together Optus and SpaceX Plan to Cover 100% of Australia](#)', 12 July 2023, accessed 6 November 2024.

48 Telstra, '[Goodbye 3G](#)', 4 November 2024, accessed 6 November 2024.

# 3. Pricing and consumer trends

As discussed above, the ACCC’s analysis uses advertised pricing from the month of June, drawn annually from Critical Information Summaries, to estimate prices for telecommunications products. This means that the prices for legacy plans that customers may still be on are not considered.

Prices used in the analysis are the ongoing price and do not include temporary discounts. Unless otherwise stated, pricing analysis does not take into account changes in product features, such as data allowances or other inclusions.

## 3.1 Retail NBN fixed broadband services

Fixed broadband services are internet services provided over fixed networks such as the NBN and other fibre-based networks.

This section focuses on NBN services that are provided over non-satellite technologies, with some limited analysis on satellite services.<sup>49</sup>

### 3.1.1 Services in operation

Over 2023–24, NBN Co reported a 0.6% increase in the number of wholesale residential fixed line and fixed wireless services in operation to 8.715 million services.<sup>50</sup> Reporting by major retailers under the ACCC’s Internet Activity Report covers 7.412 million retail NBN broadband services as at June 2024, or approximately 85% of NBN services (fixed line and fixed wireless).<sup>51</sup> This indicates that a portion of NBN services (approximately 1.303 million) were on-sold by NBN access seekers to the NBN reseller market, or were supplied by NBN Co to smaller retailers not covered by the ACCC’s Internet Activity reporting.

NBN retail market shares can be determined by comparing the number of NBN services reported by retailers in the Internet Activity record keeping rule to the total number of wholesale NBN services reported by NBN Co (Figure 3 below).

In June 2024, Telstra had the largest market share in the retail market for NBN fixed broadband services (35%), followed by TPG Telecom (20%) and Optus (12%).<sup>52</sup> Competing retailers have impacted the retail market over time, including Aussie Broadband, who has increased its share to 7%, and Superloop, which has reached 4% of the market (and was included in the Others category for 2022 and 2023) in Figure 3 below.

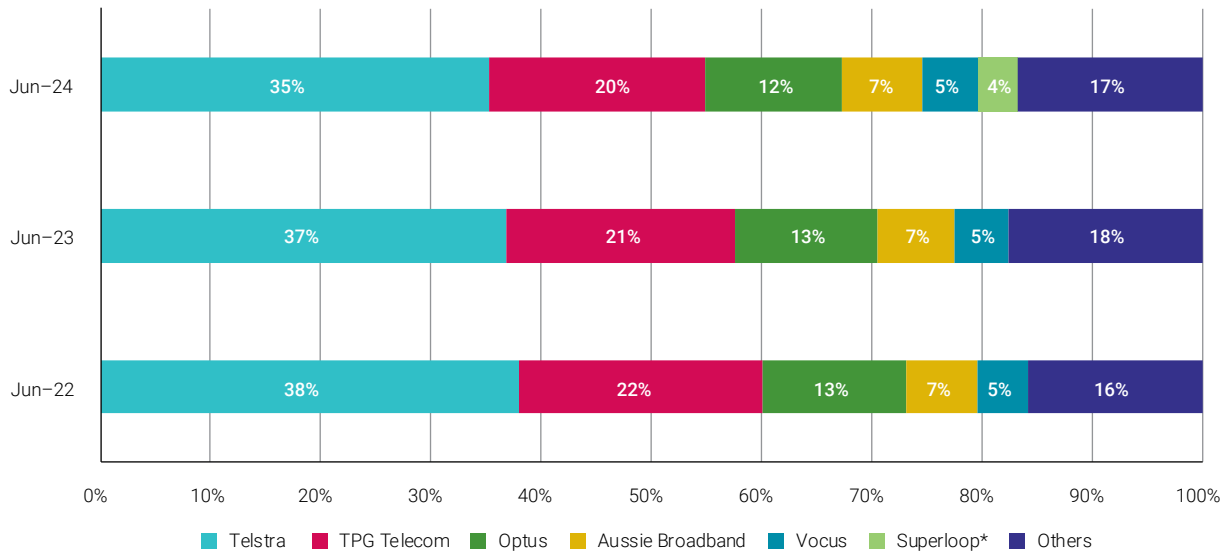
49 NBN fixed wireless has been included in the analysis of fixed broadband services due to the functional similarity between fixed wireless and other fixed access technologies.

50 ACCC, [‘NBN Wholesale Market Indicators Report – June quarter 2024 report’](#), 27 August 2024, accessed 30 September 2024; ACCC, [‘NBN Wholesale Market Indicators Report – June quarter 2023 report’](#), 15 September 2023, accessed 30 September 2024.

51 ACCC, [‘Internet Activity Record Keeping Rule – June 2024 Report’](#), December 2024. See section (4)(1) for major retailers in ACCC, [‘Internet Activity Record Keeping Rules’](#), December 2022, accessed 9 October.

52 A different methodology has been used for market shares this year, where proportion market shares have been calculated using retail numbers for major providers from the Internet Activity Report, while the total number of NBN services from the NBN Wholesale Market Indicators report is used for the denominator. Previously the total number of all NBN retail services from the Internet Activity Report was used as the denominator. Sub-brands are included under the major organisation.

**Figure 3: Retail NBN market share (major retailers only), 2022 to 2024**

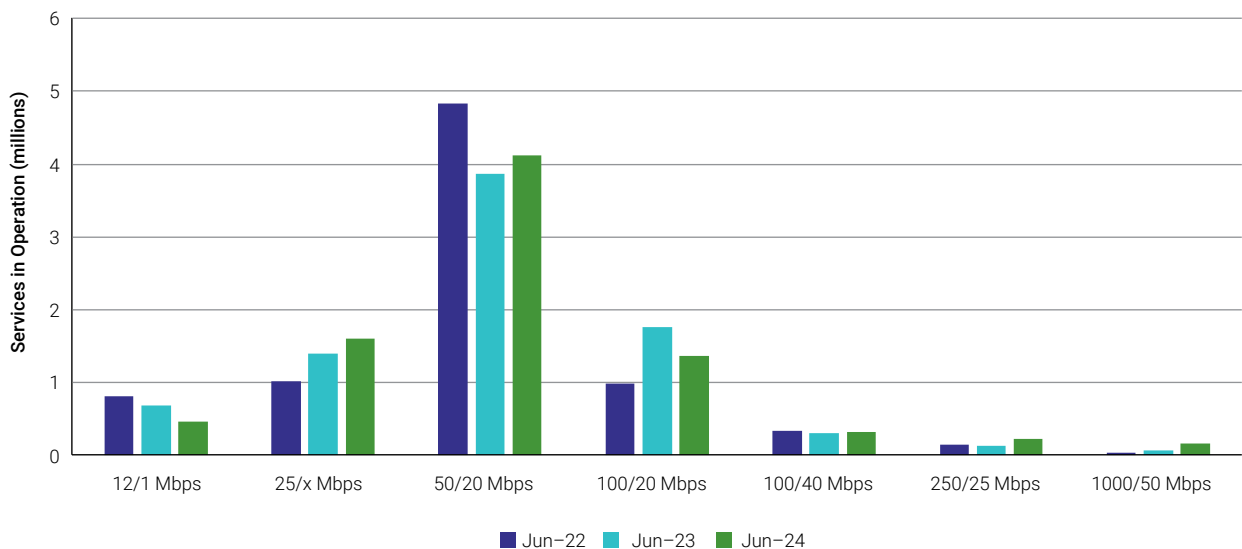


Note: \* Superloop is included in the Others category for 2022 and 2023.  
 Source: [ACCC Internet Activity Reports](#) and [NBN Wholesale Market Indicators Reports](#).

Figure 4 below shows the 50 Mbps speed tier remains the most popular choice for consumers of NBN fixed line broadband, with a slight increase in 2024. As previously reported by the ACCC, the increase in 50 Mbps speed tier services in 2024 alongside decreasing 100/20 Mbps services is unlikely to reflect an actual shift in household preferences from 100/20 Mbps services to 50 Mbps.<sup>53</sup>

Rather, it is more likely that NBN Co’s wholesale price changes in 2023 have led to the 50 Mbps wholesale tier being more cost-effective for supplying 50 Mbps retail services. That is, previously some 50 Mbps retail services were supplied to end-users using a 100/20 Mbps wholesale service to over provision their retail offers in order to realise cost efficiencies.

**Figure 4: NBN fixed line broadband wholesale services by speed tier, 2022 to 2024**



Note: 25/5 Mbps and 25/10 Mbps speed tiers are combined as retailers tend to offer one of the 2 plans, rather than both.  
 Source: [NBN Wholesale Market Indicators Report – June quarter 2024 report](#).

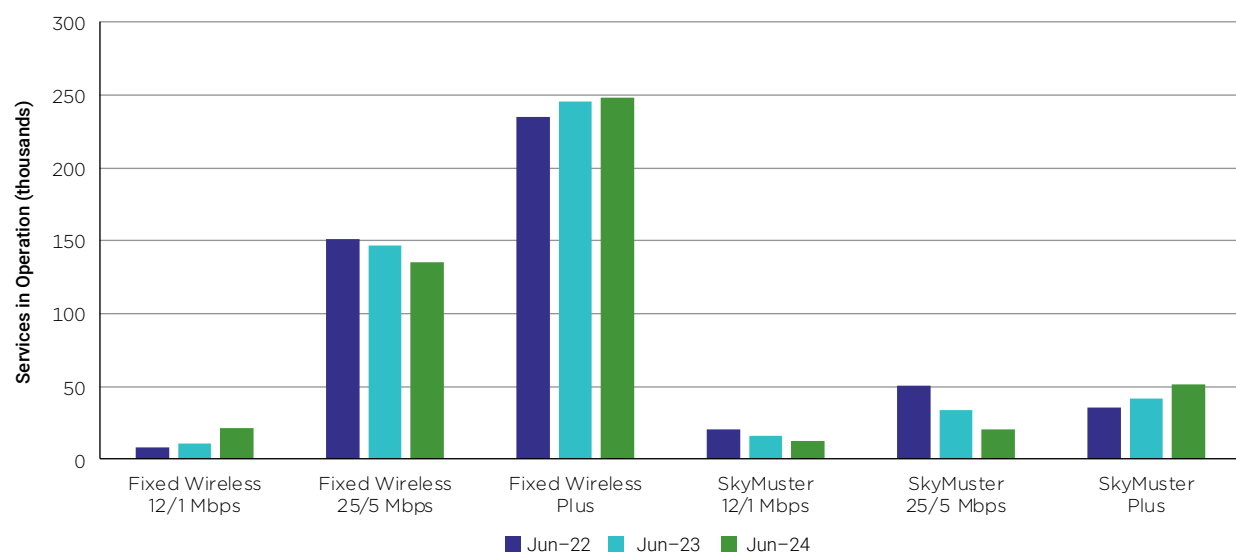
<sup>53</sup> ACCC, [‘Aussie Broadband leads wholesale growth on the NBN’](#), 14 March 2024, accessed 8 October 2024.

While only accounting for a small share of services, the 250/25 Mbps and 1,000/50 Mbps speed tiers have also continued to see an increase of services in operation. Estimated market share of 250 Mbps and above retail plans has doubled, from 2.5% to 5%, between 2022 and 2024.

Consumers continue to move off the 12 Mbps service, which only accounted for 5.7% of fixed NBN services at the end of June 2024.<sup>54</sup> The 25 Mbps speed tier increased in the year to June 2024, with some customers likely moving up from the 12 Mbps speed tier and down from the 50 Mbps speed tier.

Consumers on NBN fixed wireless connections continue to trend towards both the higher speed Fixed Wireless Plus and lower speed Fixed Wireless 12 Mbps connections (Figure 5 below). The introduction of Fixed Wireless Home Fast and Home Superfast speed tiers in the second half of 2024 may also create a significant consumer shift in the coming year.

**Figure 5: NBN wireless and satellite broadband wholesale services by speed tier, 2022 to 2024**



Source: [NBN Wholesale Market Indicators Report – June quarter 2024 report](#).

SkyMuster Plus services have been increasing since it was introduced, but at a slower rate than the decrease in subscribers on standard SkyMuster plans. This suggests subscribers may be moving to alternative satellite providers, such as Starlink, or other technologies, such as mobile network options. However, the number of subscribers moving away from NBN satellite services could be related to the expansion of the NBN fixed wireless footprint, which may also contribute to the increase in Fixed Wireless 12 Mbps plans in 2024.

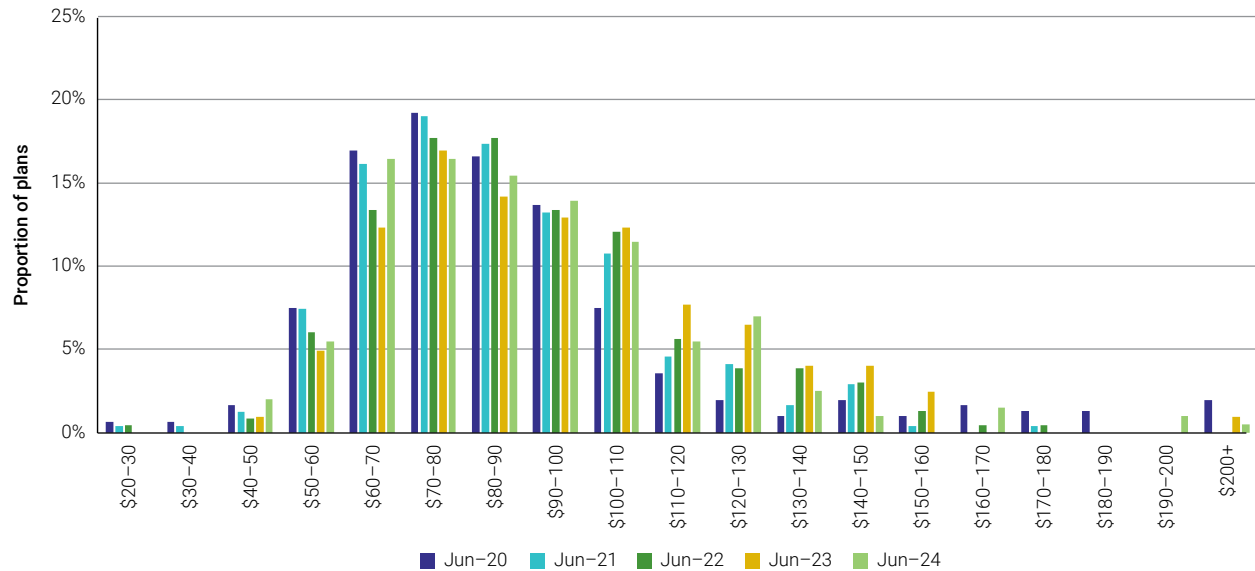
<sup>54</sup> ACCC, [‘Internet Activity Record Keeping Rule – June 2024 Report’](#), December 2024.

## 3.1.2 Pricing

### Range of plans available

Retailers offer plans at various price points and the number and variety of plans available varies between these price points.<sup>55</sup> Figure 6 below shows the proportions of NBN retail fixed broadband plans at various price points over the last 5 years. For example, the \$50–60 price point captures retail service plans that are greater than \$50 and less than or equal to \$60.

**Figure 6:** Percentage of NBN fixed line broadband plans at various monthly price points, 2021 to 2024



Note: Prices are in nominal terms.

Source: ACCC estimates based on information from service provider websites.

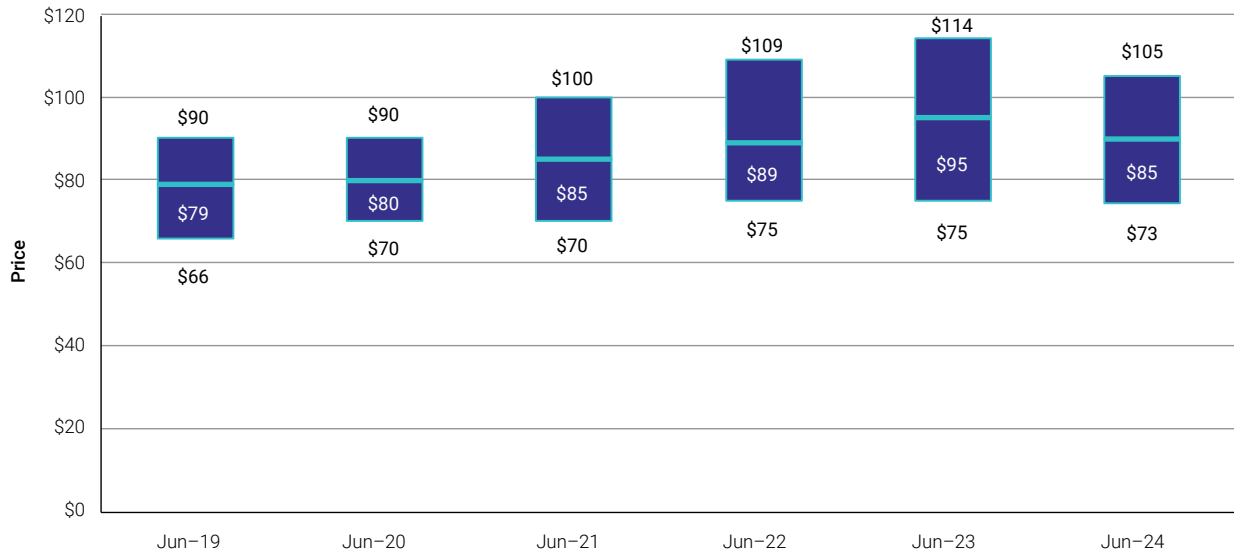
Over recent years, there has been an increase in the number of higher priced plans offered by retailers; however, recent changes to NBN wholesale pricing have brought the higher speed tiers to lower price points, encouraging consumers to move to the high speed plans. Concurrently, the popular lower speed plans have experienced an increase in retail price, leading to a much narrower distribution of fixed broadband prices.

Overall, advertised prices for NBN fixed line broadband services decreased in 2023–24 across all plans sampled, as shown in Figure 7. From 2023 to 2024, per month retail prices (exclusive of discounts):

- on low-range plans (25th percentile) decreased by 3% (or by \$2) to \$73
- at the mid-range (median) price point decreased by 10% (or by \$10) to \$85
- on the higher-range plans (75th percentile) decreased by 8% (or by \$9) to \$105.

<sup>55</sup> Data on retailers' market offers are drawn annually from Critical Information Summaries, which retailers must publish on their website. Prices in the Critical Information Summaries may not reflect prices predominantly advertised on the website of service providers due to temporary discounting.

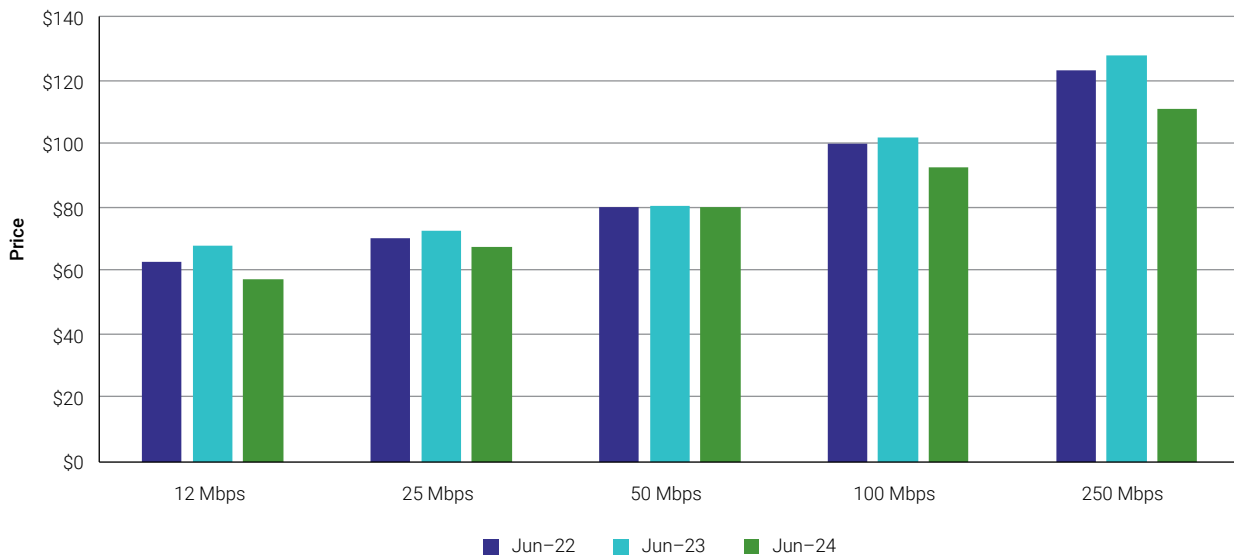
**Figure 7: Median advertised price and interquartile range for NBN fixed services, 2019 to 2024**



Note: Prices are in nominal terms, across all plans sampled. Includes median (opal).  
 Source: ACCC estimates based on information from service provider websites.

Price decreases on the available low-range, mid-range and higher-priced plans were also reflected across the average price of plans sampled by the ACCC, with all common speed tiers, other than 50 Mbps, having a significantly lower price in 2024 (Figure 8).

**Figure 8: Average NBN fixed line broadband advertised prices by download speed, 2022 to 2024**

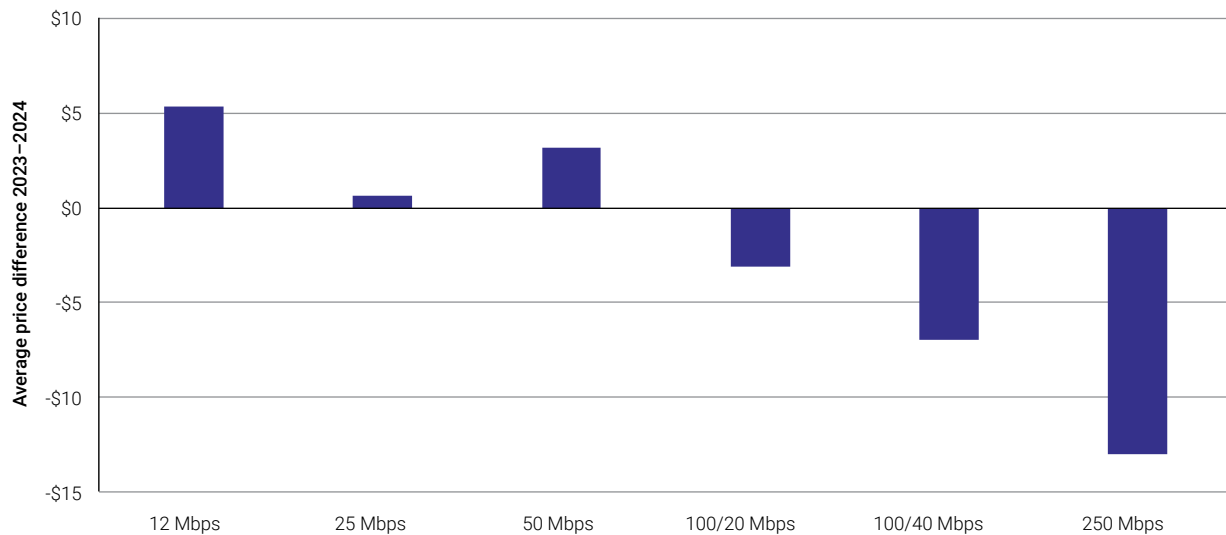


Note: Prices are in nominal terms.  
 Source: ACCC estimates based on information from service provider websites.

One of the reasons for the reduction in average available price across all speed tiers is a simplification of bundled products offered by retailers. While previously retailers may have offered different plans with or without bundled inclusions, such as voice calls, these options now frequently appear as add-ons, or are simply included without additional cost. This has led to fewer bundled plans, which typically have a higher cost, resulting in lower average costs in the ACCC’s analysis.

To determine price changes without a loss of features across years, the ACCC examined a narrower, standard set of comparable products between 2023 and 2024 (Figure 9).<sup>56</sup> In this analysis, an increase in prices across the lower speed tiers can be seen, which more closely reflects the changes experienced by most consumers.

**Figure 9:** Average price changes across simplified NBN fixed line broadband plans of major retailers, 2023 to 2024



Source: ACCC estimates based on information from service provider websites.

Note: Only major retailers and a simplified list of comparable plans was used to demonstrate these price changes.

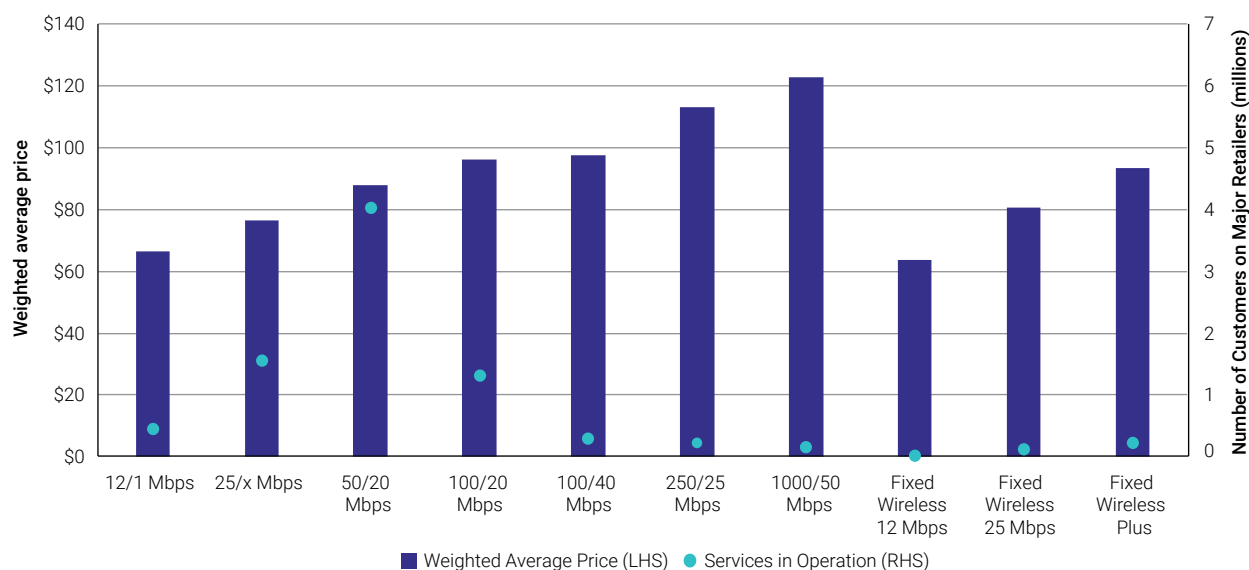
Under this simplified price comparison set out in Figure 9, the retail price of major retailers’ 100 Mbps and greater plans had significant price decreases in 2024 (between \$3–13), while the 12 and 50 Mbps plan prices increased (by over \$5 and around \$3 respectively), somewhat in line with the latest wholesale pricing under the SAU discussed in Chapter 2. In contrast, the 25 Mbps plans experienced a slight increase in retail pricing (by less than \$1).

## Customer weighted prices

Weighting the available NBN broadband plan prices with the number of NBN customers on major retailers, as per the NBN Wholesale Market Indicators Report figures, provides a closer estimate of what consumers are paying for NBN broadband (Figure 10).

<sup>56</sup> This subset of plans was based on data from 11 of the 32 NBN service providers surveyed, comprised of the major retailers that cover the majority of the NBN market share.

**Figure 10: Average price weighted by number of retailers' customers and their advertised NBN plans, and number of customers sampled for each speed tier, 2024**



Source: [NBN Wholesale Market Indicators Reports](#) and ACCC estimates based on information from service provider websites.

After weighting advertised prices with the estimated number of customers on each plan, on average, customers subscribed to 50 Mbps plans are likely to be paying around \$88 per month, significantly above the average advertised plan price of \$80 (as per Figure 8 above). This highlights that, despite the availability of cheaper plans within the same speed tier, a significant portion of consumers are purchasing higher priced plans. This may indicate that consumers are either less aware of lower cost options, or place greater emphasis on non-price factors, such as plan inclusions or brand reputation. This trend is consistent across almost all speed tiers.

## 3.2 Retail non-NBN services

Non-NBN fixed broadband services are provided over networks owned by service providers other than NBN Co. Historically, these services have been mostly delivered over Telstra’s copper network, the Optus and Telstra hybrid fibre coaxial (HFC) networks, and small fibre networks in apartment complexes, regional cities and new housing estates. Some of these networks have been transferred to NBN Co or other carriers in recent years, while Optus’ HFC network has been decommissioned and Telstra’s copper network continues to be decommissioned within the NBN fixed line footprint.

Outside the NBN fixed line footprint, Telstra is required to maintain its copper network, which is capable of providing access to digital subscriber line (DSL) broadband services.<sup>57</sup> However, many retail service providers no longer offer legacy ADSL services, including Telstra, which now only maintains the service for existing ADSL customers. Telstra continues to offer the service wholesale to other retailers, and some retailers are still marketing ADSL plans. Some consumers may also have the choice of receiving fixed wireless (including from regional wireless internet service providers) or satellite broadband services in these areas.

More recently, there has been an increase in mobile network operators promoting their mobile networks to provide home wireless broadband. While this market segment was maturing, the Communications market report previously reported on home wireless broadband alongside other mobile services provided over mobile networks. However, due to the nature of the service and

<sup>57</sup> DITRCA, [Universal Service Guarantee](#), 3 September 2021, accessed 17 October 2024.

increasing consumer attraction to home wireless broadband as an alternative to traditional fixed line broadband, this type of connection is now examined alongside other non-NBN broadband services.

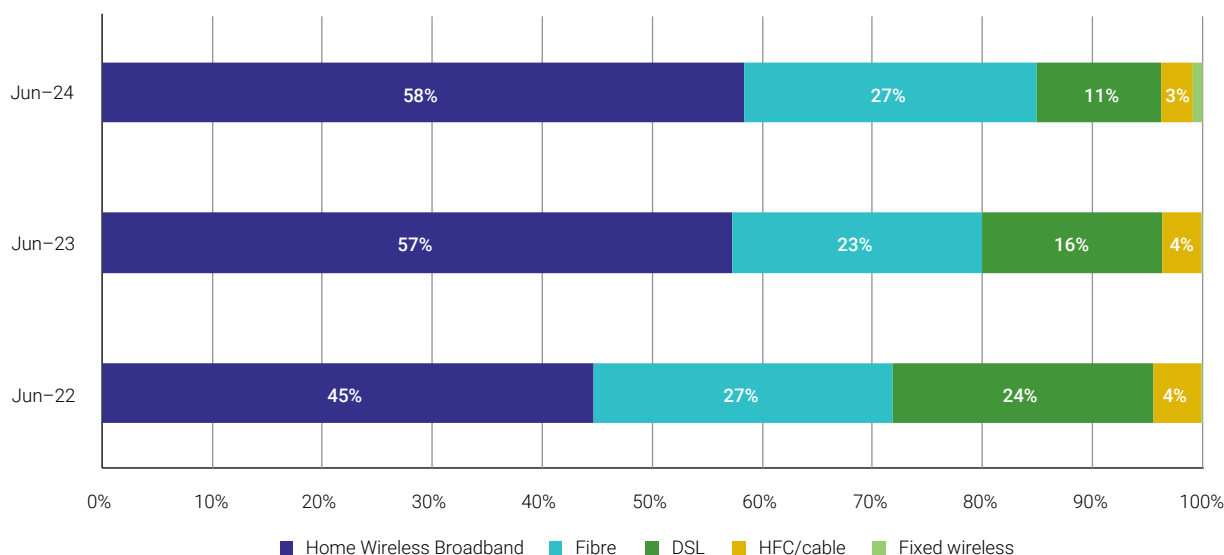
The other major change to the non-NBN market has been the introduction of LEO satellite broadband through Starlink. On 25 September 2024, the ACCC amended the Internet Activity record keeping rules to add Starlink as a record keeper and introduce the requirement to report on their wholesale and retail satellite services. These changes will not take effect until 2025, and as such, Starlink services are not included in this year’s analysis.

### 3.2.1 Services in operation

Home wireless broadband is different from home Wi-Fi that is connected to a fixed line broadband service. It uses 4G & 5G mobile networks, is only available in selected areas, usually metropolitan areas, and is currently only offered by mobile network operators or mobile virtual network operators.

Home wireless broadband has quickly become the most common non-NBN broadband service, as shown in Figure 11 below. The number of non-NBN broadband services has been increasing since 2022, by 6% in 2023 and 16% in 2024, driven almost entirely by home wireless broadband services. The ACCC’s Internet Activity Report for June 2024 shows that, as of June 2024, there were around 553,000 home wireless broadband services in operation.<sup>58</sup> This represents an increase of 18% from June 2023, and continues the significant growth trend observed in the previous year, i.e. a 36% increase from June 2022 to June 2023.<sup>59</sup>

**Figure 11: Proportion of retail non-NBN services in operation by access technology, 2022 to 2024**



Notes: The market shares above cover most, but not all, of the retail market for non-NBN broadband services. Excludes non-NBN fixed satellite access technologies.

Source: [ACCC Internet Activity Reports](#).

58 ACCC, 'Internet Activity Record Keeping Rule – June 2024 Report', December 2024.

59 ACCC, 'Internet Activity Record Keeping Rule – June 2024 Report', December 2024.

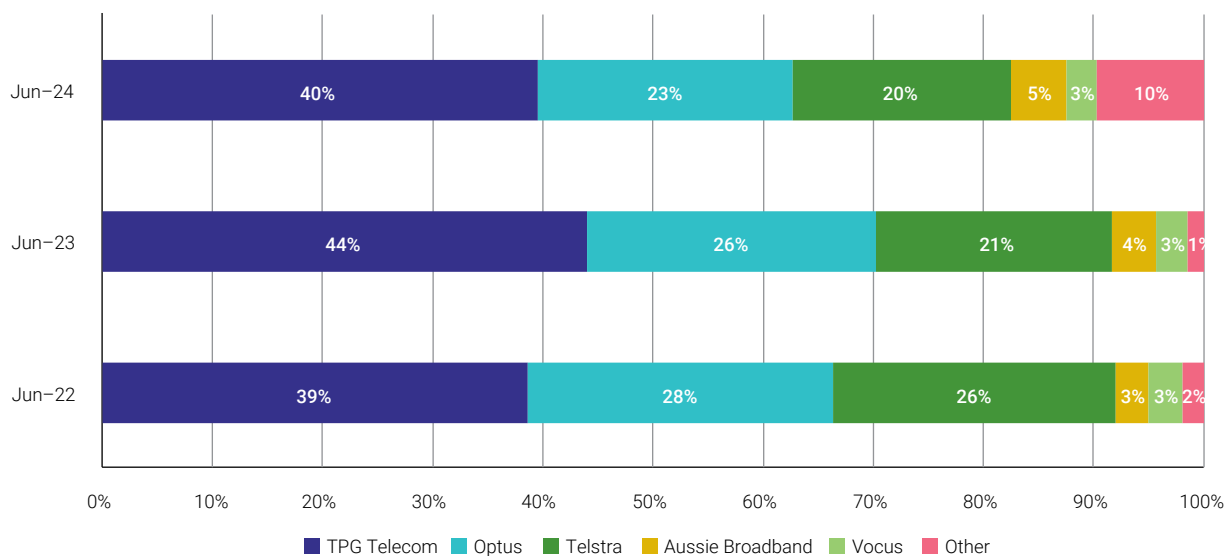
The number of DSL services continued to decrease, in line with previous trends, falling 20% between June 2023 and June 2024. This represents a smaller decrease than previous years, with the number of services decreasing 27% between June 2022 and June 2023. The changes are largely driven by the continuing migration of services from Telstra’s copper network to the NBN. A small number of DSL services are likely to remain outside the NBN fixed line footprint where Telstra is obligated to continue to maintain services on its copper network until 2032.

Non-NBN HFC and Cable services also continued to decline, with the total number dropping by approximately 8% in 2023–24. The number of reported fibre and fixed wireless services increased in the year to June 2024, but this is related to the addition of new record keepers, Uniti Retail Pty Ltd and Superloop Limited, which have started reporting data for these technologies.

In addition to the information collected by the ACCC and set out in Figure 12, Starlink announced that it has recently reached over 250,000 Australian customers in July 2024.<sup>60</sup> This represents a share equivalent to approximately 21% of all non-NBN retail broadband services that were reported through the Internet Activity record keeping rule for June 2024.

Figure 12 below shows the retail market share for the non-NBN market. From June 2023 to June 2024, Telstra’s market share in the non-NBN retail market has decreased slightly, driven by the decommissioning of legacy ADSL services but slightly offset by increasing home wireless broadband services. Both TPG Telecom and Optus have maintained their significant market shares, primarily made up of home wireless broadband services. The introduction of new record keepers in the 2023–24 reporting period contributed to the very large change to the ‘Other’ market share shown between June 2023 and June 2024.<sup>61</sup>

**Figure 12: Retail non-NBN broadband market share (major retailers only), 2022 to 2024**



Notes: The market shares above cover most, but not all, of the retail market for non-NBN broadband services. Excludes non-NBN fixed satellite access technologies.

Source: [ACCC Internet Activity Reports](https://www.accc.gov.au/Internet-Activity-Reports).

60 Starlink, @Starlink, <https://x.com/Starlink/status/1816867256971980872>, 27 July 2024, accessed 10 October 2024.

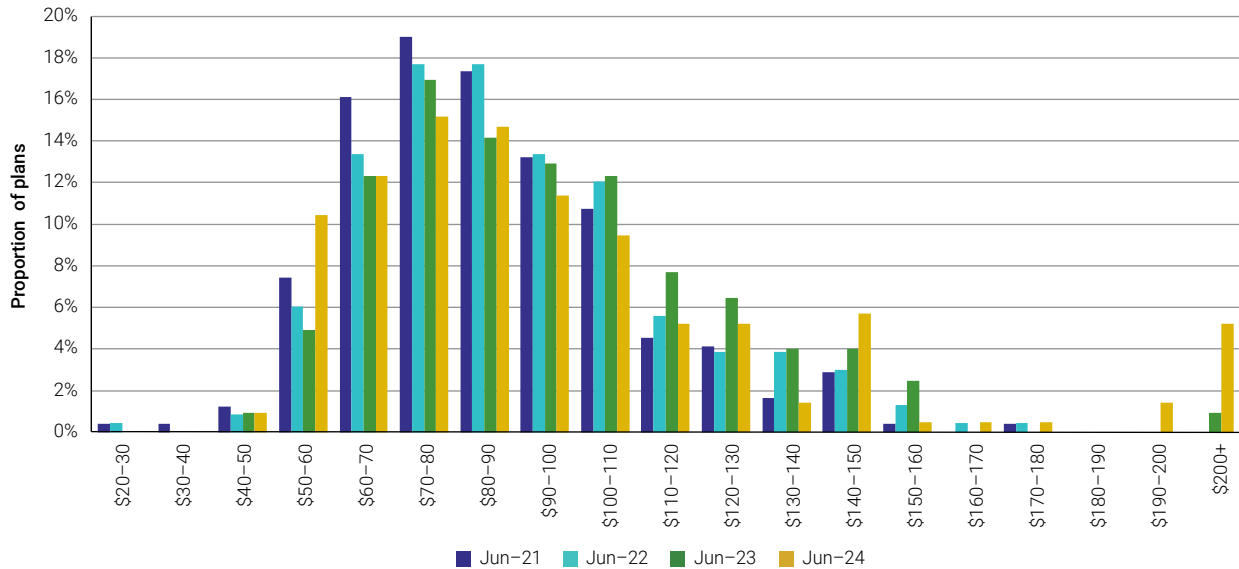
61 ACCC, [2023 amendments to record keeping rules](https://www.accc.gov.au/Internet-Activity-Reports), 20 December 2023.

## 3.2.2 Pricing

### Range of plans available

Figure 13 shows that in 2024, the greatest proportion of non-NBN fixed broadband plans were in the \$50–110 price range, accounting for more than 73% of all plans on offer.

**Figure 13: Percentage of non-NBN fixed broadband plans at various price points, 2021 to 2024**



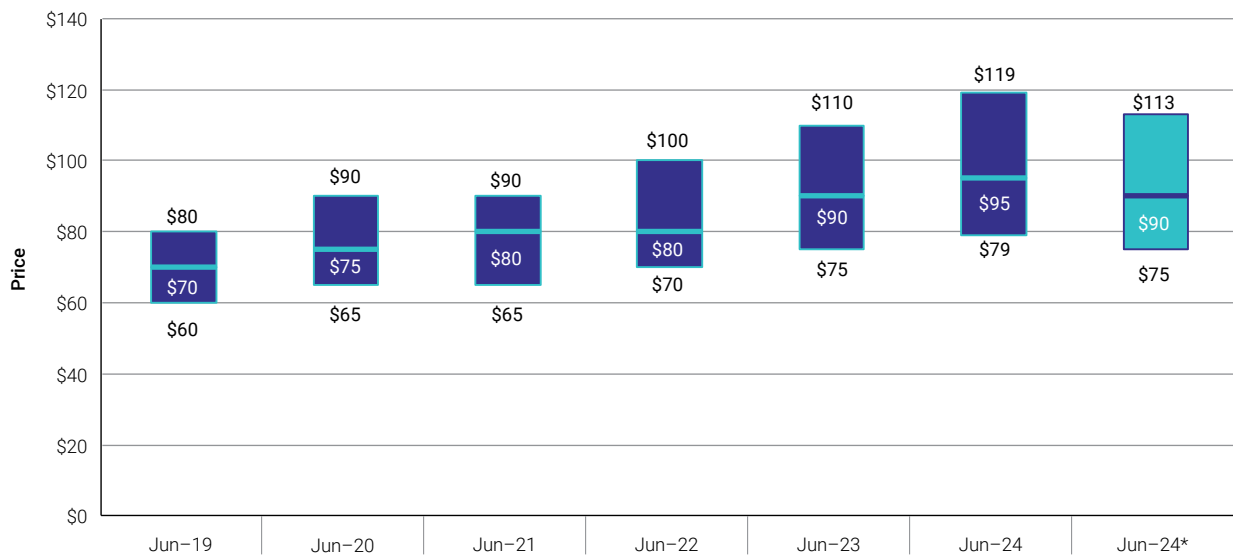
Note: Prices are in nominal terms.

Source: ACCC estimates based on information from service provider websites.

Figure 13 also illustrates the movement of non-NBN plans to higher price points compared with previous years, particularly extremely high-cost plans above \$200 per month. Some high-cost plans above \$200 per month have appeared, which provide very high performance on very small networks and are not available for many customers.

In 2023–24, the advertised prices for non-NBN fixed line broadband services increased across all plans sampled, as shown in Figure 14.

**Figure 14: Median advertised price and interquartile range for non-NBN fixed services, 2019 to 2014**



Notes: Prices are in nominal terms across all plans sampled. Includes median (opal).  
 \* Home Wireless Broadband prices included. Includes median (violet).

Source: ACCC estimates based on information from service provider websites.

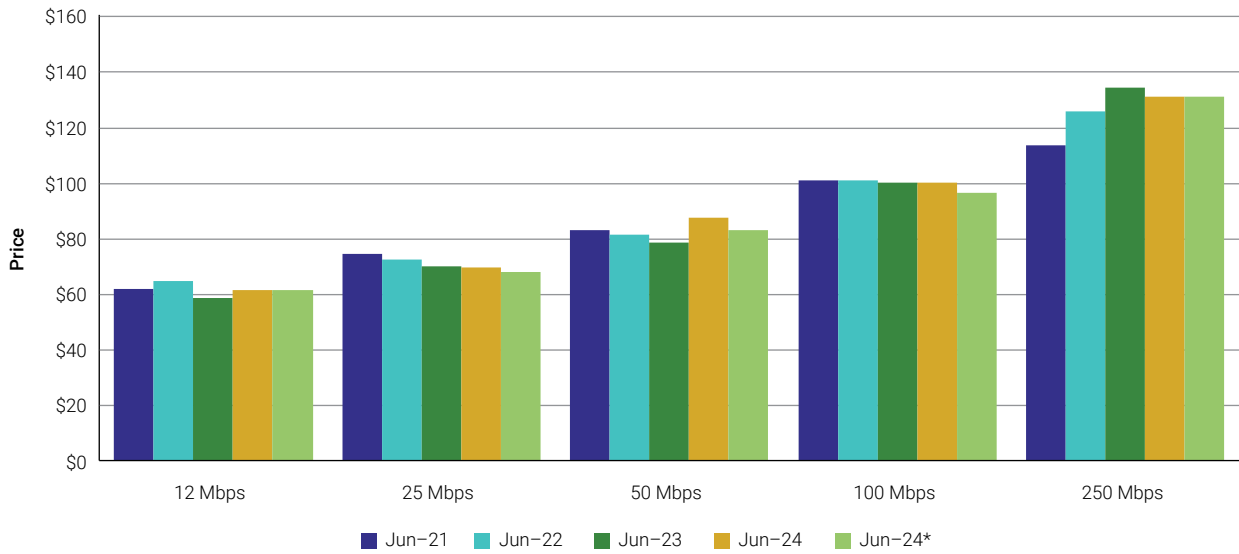
On a like-for-like basis (i.e. violet data in Figure 14) across the major low-range, mid-range and high-range plans, pricing of non-NBN broadband services increased between 2023 and 2024. The increase in low-range plans may be attributable to the decrease in available DSL offers, with no major retailers offering DSL plans and only very few offered by smaller retailers. However, the increase in prices in the high-end likely represents an increase in availability of niche plans on small networks, and at extremely high price points (greater than \$200), as outlined above.

Analysis of available plans with home wireless broadband included reduces the price of each quartile of available plans (i.e. opal data in Figure 14). The low-range and mid-range plans all have similar price points to the plans available on the NBN (see Figure 7 above).

The proportion of retail plans on offer with download speeds of 50 Mbps or less also continued to decline, now accounting for around 35% of the plans, while a greater number of higher speed plans were also available.

Similar to changes in NBN pricing, the non-NBN 12 and 50 Mbps plans increased in price for 2024, while the other common speed tiers all saw a decrease in average pricing (Figure 15). The change in price of these plans is better reflected for non-NBN networks as they have historically had lower availability of bundled plans, meaning changes in pricing are better reflected in the average prices (see Figure 9 discussion).

**Figure 15: Changes in average non-NBN fixed broadband advertised prices by plan download speed, 2021 to 2024**



Note: Prices are in nominal terms. Plans with different speed tiers are excluded. \*Home Wireless Broadband included.  
 Source: ACCC estimates based on information from service provider websites.

The price, speed and data allowance of home wireless broadband plans are comparable to fixed broadband plans such as those supplied over the NBN. As such, home wireless broadband services are becoming increasingly attractive to consumers in some areas as an alternative to fixed line services.

The current home wireless broadband price and speed offerings with unlimited downloads (excluding discounts) are shown in Table 1 below.

**Table 1:** Advertised prices and typical speeds for home wireless broadband, flagship mobile network operator brands, 2023 to 2024

Retailer	2023 price <sup>62</sup>	2024 price <sup>63</sup>	Typical evening download speed 2023 <sup>64</sup>	Typical evening download speed 2024 <sup>65</sup>
Telstra	\$85	\$85	50–600 Mbps <sup>66</sup>	30–633 Mbps <sup>67</sup>
Optus	\$99	\$99	240 Mbps	210 Mbps
Optus	\$79	\$79	87 Mbps	87 Mbps
Optus	\$69	\$69	45 Mbps	45 Mbps
Vodafone	\$70	\$70	96 Mbps	100 Mbps
Vodafone	\$65	\$65	50 Mbps	50 Mbps
Vodafone	n/a	\$60	n/a	15 Mbps

Source: Retailers' websites.

### 3.3 Fixed voice services

The number of fixed voice services in operation reported to the ACCC, including both legacy copper and VoIP-based services (such as NBN), has seen a slow decline over the last 3 years, reducing from 6.8 million to just below 6 million in June 2024 (Figure 16). Unconditioned Local Loop Services make up less than 10 services Australia wide, and nearly all copper voice services are now delivered by Telstra.<sup>68</sup>

62 ACCC, Communications Market Report 2022–23, p 11.

63 As at 11 October 2024, Telstra, '[Why choose 5G Home Internet?](#)', accessed 11 October 2024; Optus, '[Choose your Optus 5G home internet plan](#)', accessed 11 October 2024; Vodafone, '[Stay connected with 5G Home Internet](#)', accessed 11 October 2024.

64 ACCC, Communications Market Report 2022–23, p 11.

65 As at 11 October 2024, Optus, '[Choose your Optus 5G home internet plan](#)', accessed 11 October 2024; Vodafone, '[Stay connected with 5G Home Internet](#)', accessed 11 October 2024.

66 Telstra, '[Why choose 5G Home Internet?](#)', accessed 2 November 2023.

67 Telstra, '[Why choose 5G Home Internet?](#)', accessed 11 October 2024; Average busy period speed (7–11 pm) was 317 Mbps as at 11 October 2024.

68 ACCC, '[Telstra customer access network record keeping rule](#)', accessed 20 November 2024.

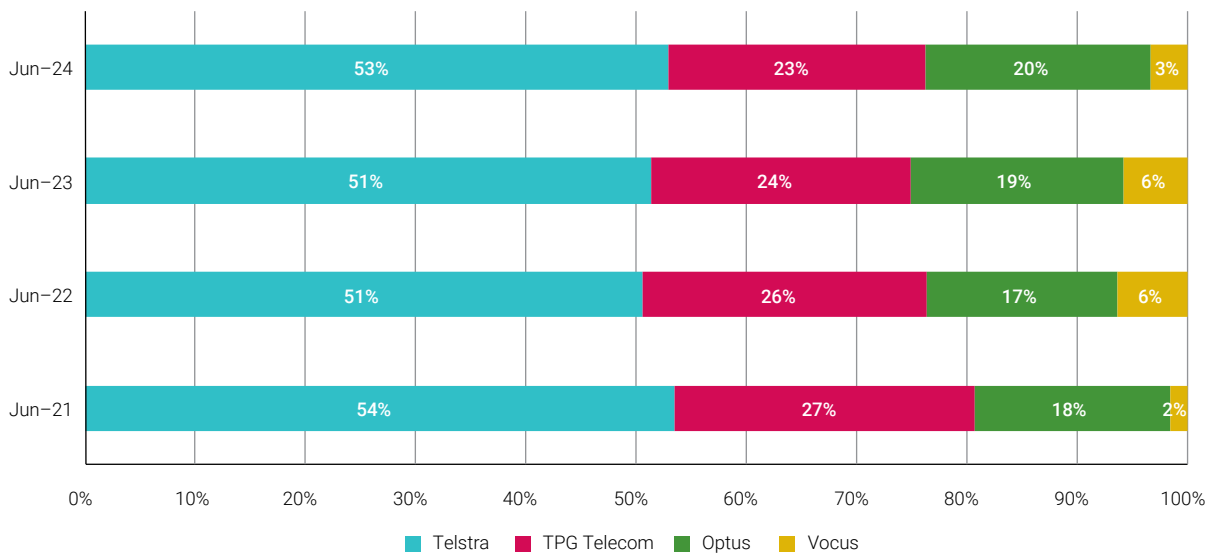
**Figure 16: Fixed voice services in operation, 2022 to 2024**



Source: (1) [NBN Wholesale Market Indicators Reports](#), (2) [Quarterly snapshots of Telstra’s customer access network](#) and (3) [ACCC Division 12 record keeping rule](#).

Figure 17 below shows that the market shares of fixed voice services in operation have fluctuated over the last 4 years, although Telstra has consistently had the highest market share of fixed voice services.

**Figure 17: Retail market share for fixed voice services, 2021 to 2024**



Source: [ACCC Division 12 record keeping rule](#).

## Range of legacy voice plans available

Only a few standalone voice plans were available in 2023–24 for the fixed voice services over the legacy copper network. These were usually offered in regional and rural areas outside the NBN fixed line footprint. In March 2024 Telstra was offering a voice only plan with unlimited local, national and mobile calls for \$50.<sup>69</sup>

<sup>69</sup> Telstra, [‘Telstra Ultimate Voice Plan’](#), n.d., accessed 20 November 2024.

## 3.4 Retail mobile phone

Telstra, Optus and TPG Telecom continue to dominate the retail market for mobile services. The 3 mobile network operators operate large vertically integrated telecommunications businesses, offering a range of pre-paid and post-paid retail products. These services include:

- mobile phone plans (a bundle of voice, messaging and data services)
- standalone mobile broadband services
- fixed wireless services (4G and 5G) capable of delivering broadband to fixed addresses at home and small business premises.

Apart from the mobile network operators, there are also mobile virtual network operators that acquire wholesale mobile services to provide retail services to consumers. In addition to the mobile network operators' flagship retail brands (Telstra, Optus and TPG Telecom's Vodafone), they also operate sub-brands that compete directly with the mobile virtual network operators for the price sensitive segment of the retail market. These mobile network operator sub-brands include Belong, Felix and Amaysim.

Mobile services remain the most common form of access to both the internet and voice services in Australia. As at 30 June 2024, there were over 30 million mobile phone services in operation, compared to the Australian population of 27.1 million.<sup>70</sup> Approximately 61% or 18.3 million of the services were post-paid services, with pre-paid services accounting for the remainder. Between 30 June 2023 and 30 June 2024, the total number of post-paid mobile phone services in operation has grown marginally by 0.9%. However, the total number of pre-paid mobile phone services has grown by 7.1% over the same period. We have previously heard that pre-paid plans are considered more affordable in the short-term if a consumer has a low or unreliable income, so this trend may be reflective of increasing financial pressures for some consumers.<sup>71</sup>

The functional distinction between post-paid and pre-paid mobile phone services has diminished in recent years, with pricing and data inclusions on pre-paid plans gradually converging to those on post-paid plans. Additionally, some retailers provide both a pre-paid and post-paid option on the same plan.

### 3.4.1 Services in operation

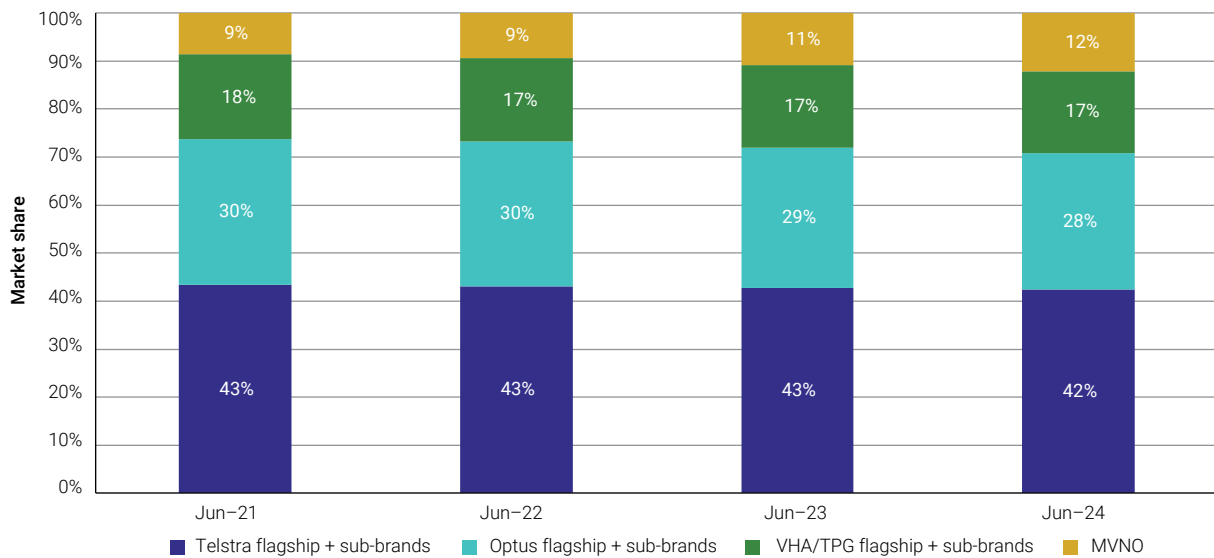
Figure 18 shows that retail market shares for mobile phone services have remained steady over at least the last 4 years, heavily concentrated in retail brands operated by the mobile network operators including related sub-brands.

As at 30 June 2024, the 3 mobile network operators' collective market share (inclusive of sub-brands) was significant at 88%. Telstra continued to lead with 42%, followed by Optus (28%) and TPG Telecom (17%). The remaining 12% market share belongs to mobile virtual network operators. The collective market share of mobile virtual network operators has grown in the last 3 years, up from 9% in 2020–21 (Figure 18).

70 ACCC, '[Internet Activity Record Keeping Rule – June 2024 Report](#)', December 2024; Australian Bureau of Statistics, '[National, state and territory population, March 2024](#)', 19 September 2024, accessed 11 October 2024..

71 ACCC, '[Regional Mobile Infrastructure Inquiry final report](#)', July 2023, p 15.

**Figure 18: Retail market share for mobile phone services – mobile network operators vs mobile virtual network operators, 2021 to 2024**



Source: [ACCC Internet Activity Reports](#).

### 3.4.2 Range of plans available

Figure 19 below illustrates the range of plans available for the mobile network operators’ flagship brands from 2020–21 to 2023–24.

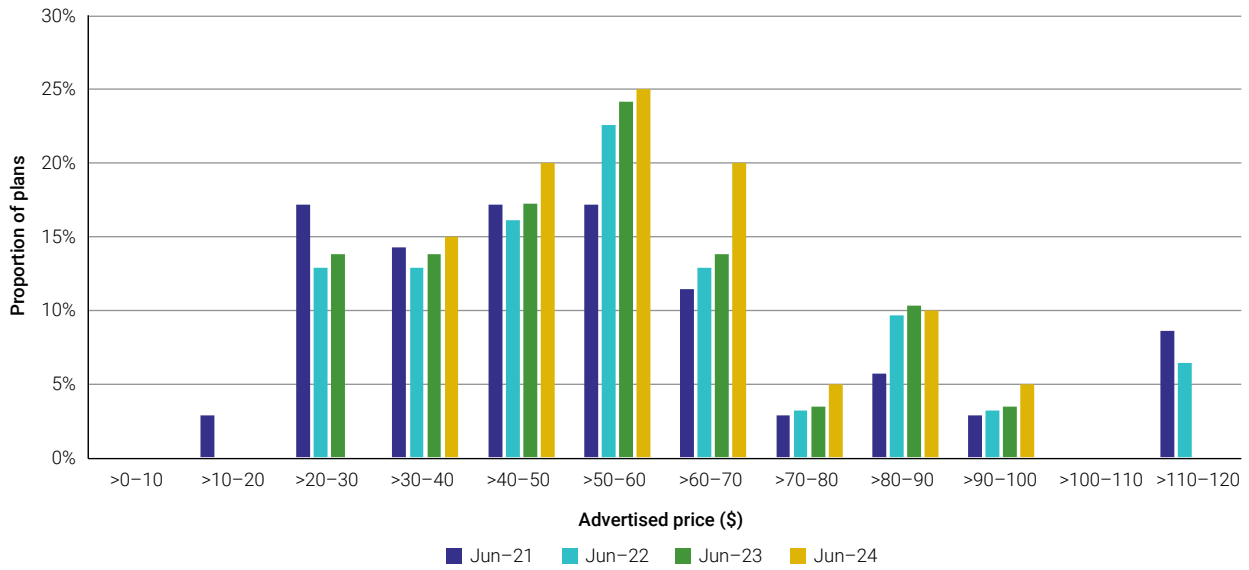
In 2023–24, the most popular price point for mobile network operator flagship plans was between \$50–\$60, unchanged from previous years. However, the number of plans included with the sample has also reduced from 35 in 2020–21 to 20 plans in 2023–24. This suggests that the mobile network operators are moving towards a consolidated number of service offerings, which may be resulting in more expensive plans overall. For example, in 2023–24, there were no monthly plans/recharges (pre-paid or post-paid) available in the \$20–\$30 category on the mobile network operator’s flagship brands.<sup>72</sup>

Additionally, it is worth noting that the increase in the percentage of plans in the \$40–\$50 and \$60–\$70 in 2023–24 was not driven by changes in prices or the number of plans in these categories, but rather by a reduction in the total sample size. As previously discussed, Optus removed pre-paid plans from sale above and below these price points.<sup>73</sup>

<sup>72</sup> Excluding discounts.

<sup>73</sup> A Choros, ‘[Optus pre-paid plans are getting speed limits in July](#)’, WhistleOut, 24 May 2023, accessed 23 July 2024.

**Figure 19: Percentage of mobile network operator flagship mobile phone plans at various price points, 2021 to 2024**

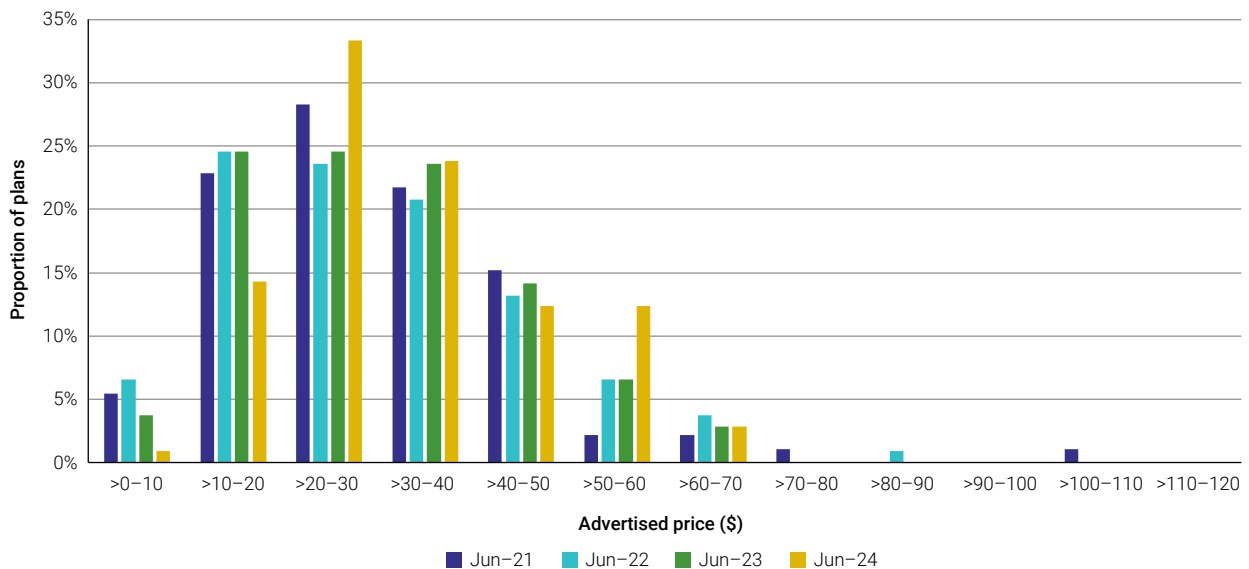


Source: ACCC estimates based on information from service provider websites.

Conversely, for non-mobile network operator flagship plans the most popular price point was \$20–\$30 (Figure 20).<sup>74</sup> In part, this appears to be driven by a reduction in plans between \$10–\$20, and as discussed below, suggests a genuine price increase.

In 2020–21, the most popular price point was also \$20–\$30. So, while the spread of plans has increased for non-mobile network operator flagship plans, the most popular price point in 2023–24 is still well below that of the mobile network operator flagship plans.

**Figure 20: Percentage of non-mobile network operator flagship mobile phone plans at various price points, 2021 to 2024**



Note: Non-mobile network operator flagship refers to mobile network operator sub-brands and mobile virtual network operators.

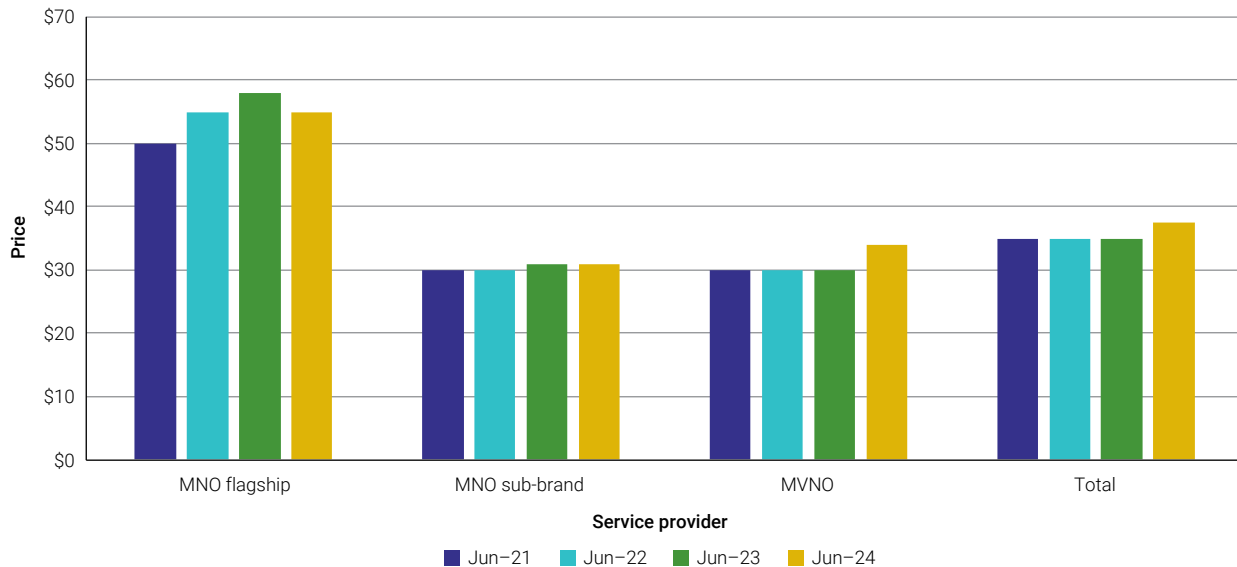
Source: ACCC estimates based on information from service provider websites.

<sup>74</sup> Non-mobile network operator means sub-brands and mobile virtual network operators.

### 3.4.3 Price changes

Figure 21 below highlights the divergence in the median advertised prices for the mobile network operators' flagship brands compared to prices for the mobile network operators' sub-brands and the mobile virtual network operators' products. Figure 21 draws on data for both pre-paid and post-post plans.

**Figure 21: Median advertised price for mobile network operator flagship, sub-brand and mobile virtual network operator mobile phone plans, 2021 to 2024**



Source: ACCC estimates based on information from service provider websites.

Figure 21 shows that, overall, the median advertised price for mobile phone services across all sampled providers has increased by 7.1% (or \$2.50) in the since 2020–21. The entire increase was experienced between 2022–23 and 2023–24.

The median advertised price for the mobile network operators' flagship brands has decreased by 5% from \$58 in 2022–23 to \$55 in 2023–24, reversing the trend observed in previous years. As discussed above, this movement is likely driven by a significant reduction in the number of plans available between 2022–23 and 2023–24.

The median advertised price for mobile network operator sub-brands increased by 3.4% (or \$1) from 2020–21 to 2023–24, but was unchanged between 2022–23 and 2023–24.

The median advertised price for mobile virtual network operators' plans increased by 13.3% (or \$4) between 2022–23 and 2023–24 after remaining unchanged for the previous 2 periods.

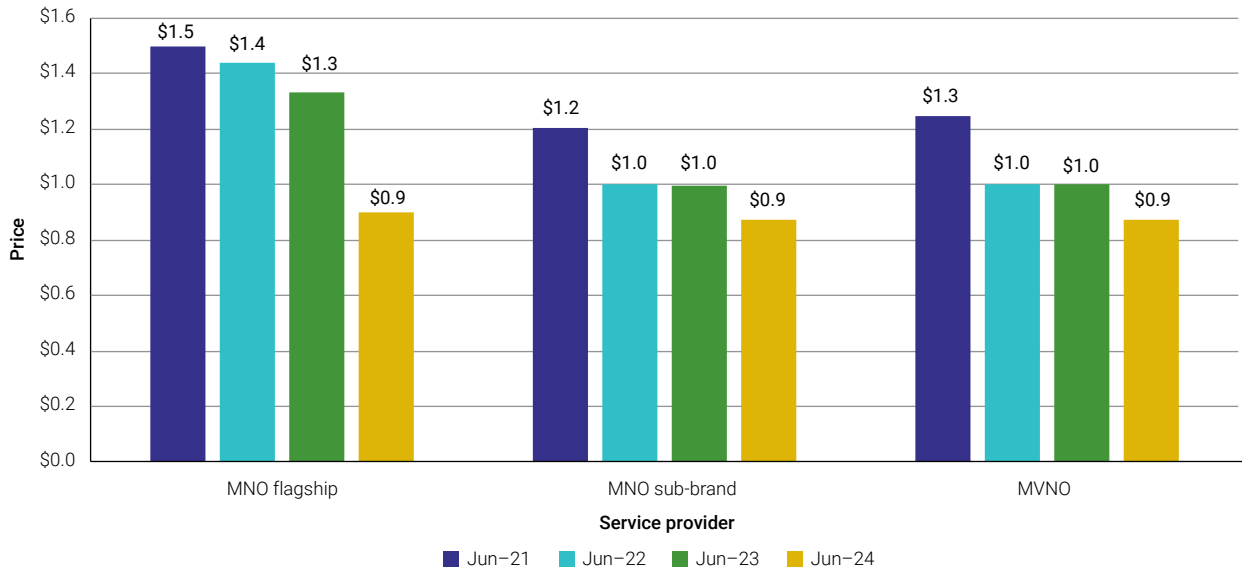
Overall, the median advertised prices for the mobile network operators' flagship brands have been significantly higher than the median advertised prices of their sub-brands and the mobile virtual network operators' plans for at least the last 4 years.

### 3.4.4 Data allowances

The price increases in mobile plans observed in recent years are often accompanied with significant increases in data allowances. This suggests that while the plans may have become more expensive, they are offering more value by way of more included data. However, consumers may not value having a greater data allowance.

Figure 22 below shows the median advertised cost per gigabyte of data across different groups of service providers. During 2023–24, the median advertised cost per gigabyte of data has become even across all service provider groups. This trend has been driven by ongoing increases to data allowances and prices together with the changing composition of plans on offer (notably consolidation of plans on offer).

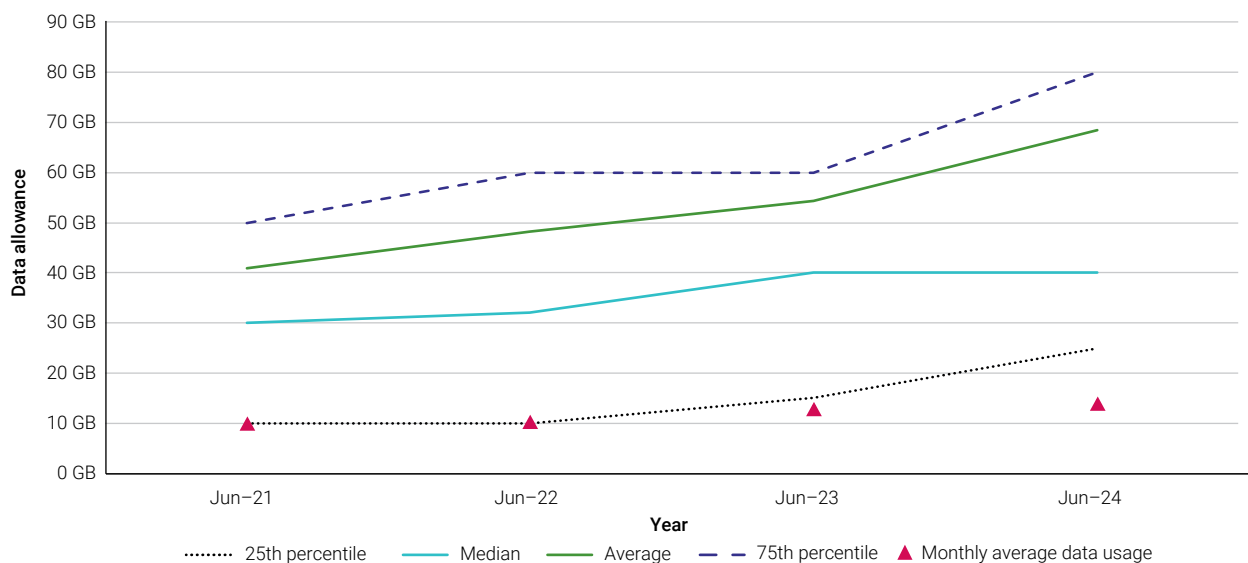
**Figure 22: Median advertised cost per gigabyte of data for mobile phone plans based on advertised data allowances, 2021 to 2024**



Source: ACCC estimates based on information from service provider websites.

Consistent with the trends observed in previous reports, average monthly data usage for mobile phone plans has been consistently well below the median and average advertised data allowances from 2020–21 to 2023–24. Figure 23 shows that the median advertised data allowance across all service providers in 2023–24 was 40 GB, up from 30 GB in 2020–21, representing a 33% increase.

**Figure 23: Average, median, 25th percentile and 75th percentile monthly data allowance for mobile phone services, 2021 to 2024**



Source: ACCC estimates based on information from service provider websites and [ACCC Internet Activity Reports](#).

In 2023–24, the ACCC estimates that the average advertised data allowance for plans (pre-paid and post-paid) across all service providers was 68 GB per month. However, the monthly average data usage reported to the ACCC was only 14.2 GB per user, up from 9.8 GB in 2020–21. This suggests that, on average, despite increased usage in recent years consumers do not use the higher data allowances that have been offered over time and may instead prefer lower data allowances for a lower price.

## 3.5 Retail mobile broadband

### 3.5.1 Services in operation

Mobile broadband is an internet connection that provides a short range, high data rate connection between a mobile data device and access points connected to a network. Examples include 4G/5G accessed through a laptop, USB/WiFi modem or tablet.

As at 30 June 2024, there were approximately 4.2 million mobile broadband services in operation.<sup>75</sup> Retail market shares for mobile broadband services have remained steady over at least the last 5 years, almost exclusively concentrated in retail brands operated by the mobile network operators.

### 3.5.2 Range of plans available

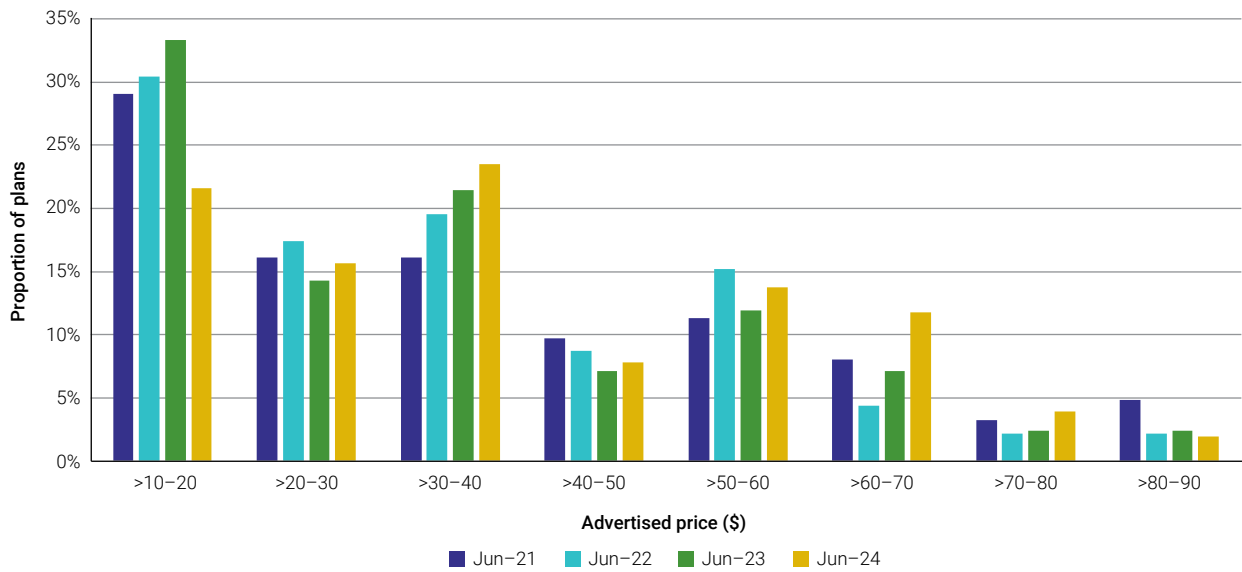
Figure 24 shows that in 2023–24 the most popular price point for mobile broadband plans was \$30–40. This advertised price category is the only category to experience an increasing proportion of plans every year since 2020–21.

Since 2022–23, there has been a reduction in the proportion of plans in the cheapest and most expensive categories (\$10–\$20 and \$80–\$90). All other pricing categories experienced an increase in the proportion of plans in the last year.

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<sup>75</sup> ACCC, '[Internet Activity Record Keeping Rule – June 2024 Report](#)', December 2024.

**Figure 24: Percentage of mobile broadband plans at various price points, 2021 to 2024**

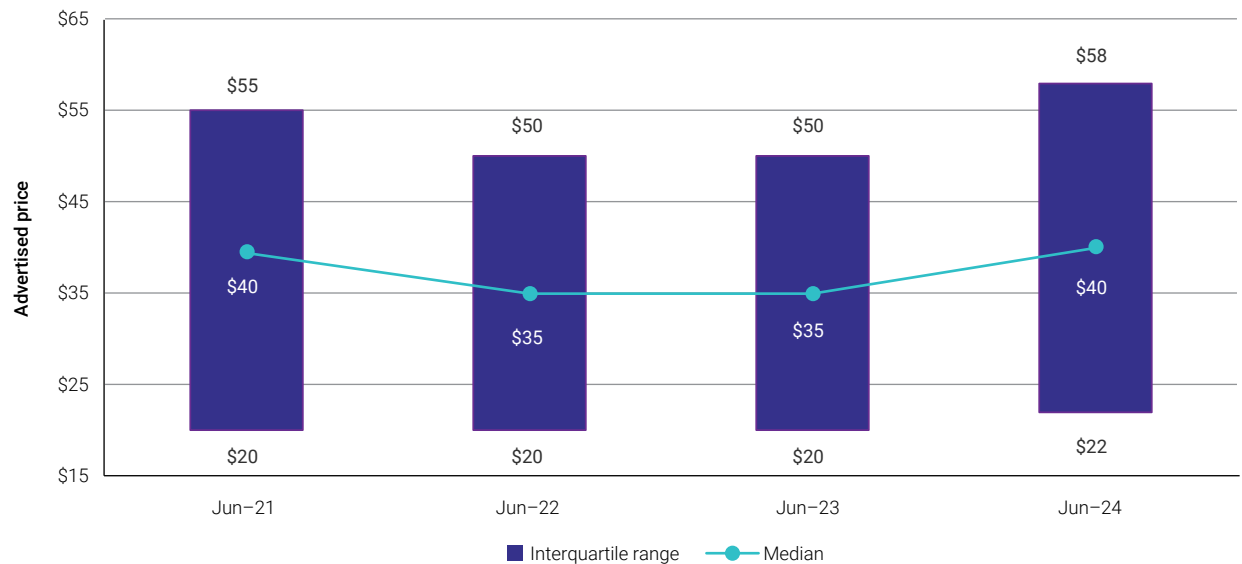


Source: ACCC estimates based on information from service provider websites.

### 3.5.3 Price changes

Since 2020–21, the median advertised price for mobile broadband plans has varied from between around \$35 per month to around \$40 per month. The interquartile range has remained largely unchanged since 2020–21 (\$35), increasing to \$36 in 2023–24 (Figure 25).

**Figure 25: Median advertised price and interquartile range for mobile broadband services, 2021 to 2024**



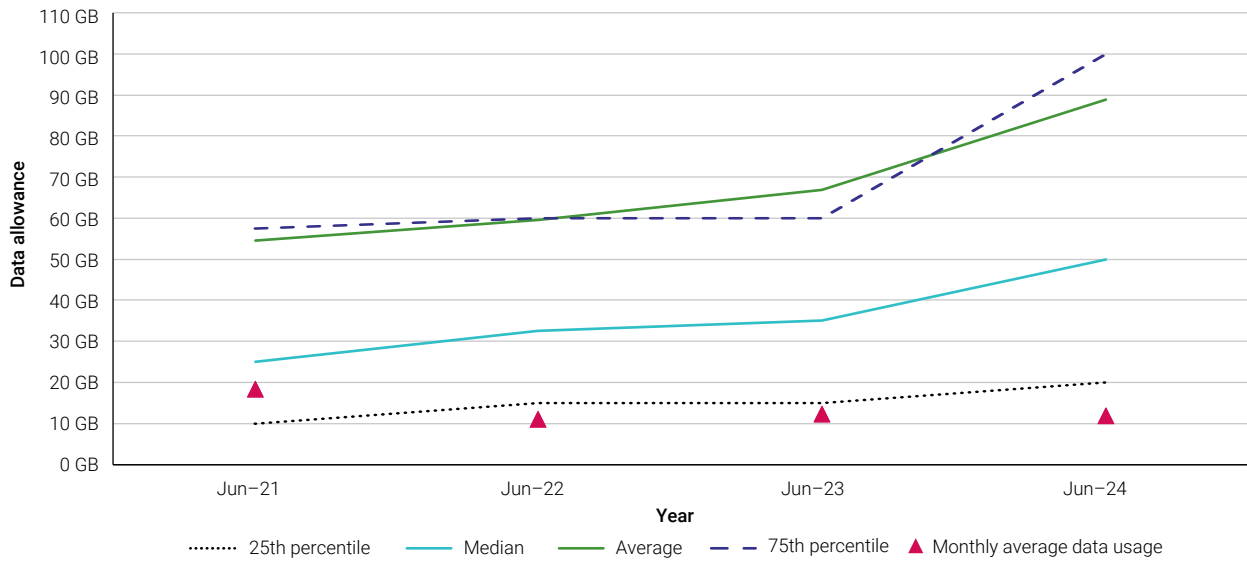
Source: ACCC estimates based on information from service provider websites.

### 3.5.4 Data allowances

The median advertised data allowance for mobile broadband plans in 2023–24 was 50 GB, up from 25 GB in 2020–21. That is a 100% increase. However, the monthly average reported data usage has decreased by 36% over the same period to 11.7 GB (down from 18.3 GB in 2020–21) (Figure 26).

This decline in average usage suggests that, on average, in recent years consumers do not use the higher data allowances that have been offered over time and may instead prefer lower data allowances for a lower price.

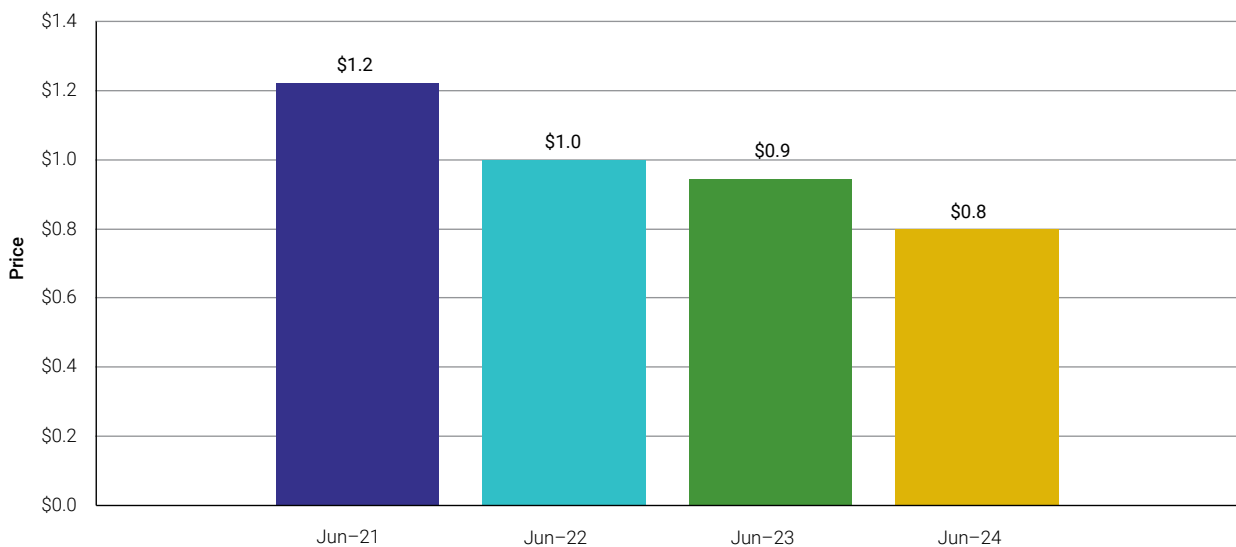
**Figure 26:** Average, median, 25th percentile and 75th percentile data allowance for mobile broadband services, 2021 to 2024



Source: ACCC estimates based on information from service provider websites and [ACCC Internet Activity Reports](#).

Figure 27 below shows that that advertised price per gigabyte for mobile broadband plans has been declining gradually over the last 4 years, from \$1.2 in 2020–21 to \$0.8 in 2023–24. This is slightly less than the \$0.9 cost per advertised gigabyte for mobile phone services.

**Figure 27:** Median advertised cost per gigabyte of data for mobile broadband plans, 2021 to 2024



Source: ACCC estimates based on information from service provider websites.

# 4. ACCC activities

## 4.1 Regulated access to telecommunications

### 4.1.1 Combined declared services inquiry

In May 2023, the ACCC commenced a combined public inquiry into whether 9 wholesale telecommunications services should continue to be regulated.<sup>76</sup> The inquiry considered whether ongoing regulation of these services would promote the long-term interests of end-users and if any changes to these regulations are appropriate.

On 25 March 2024, the ACCC published a final report for all services except the domestic mobile terminating access service. The ACCC's final positions were to:

- Extend the declaration of the domestic transmission capacity service for a further 5 years and vary the service description to reflect technological changes since the last declaration inquiry.
- Extend the declarations of the resale fixed line services (local carriage service, wholesale line rental and wholesale asymmetric digital subscriber line) for a further 5 years without changes to the service descriptions.
- Extend the declarations of the fixed originating and terminating access services for a further 5 years and vary the service descriptions to reflect the industry trends towards IP-based interconnection.
- Allow the declarations of the unconditioned local loop and line sharing services to expire without making a new declaration.

In relation to the domestic mobile terminating access service, the ACCC conducted further consultation and information gathering due to the complexity of the issues involved. In particular, the ACCC examined whether to change the service description to refer to termination to a mobile number rather than a digital mobile network and whether to include application-to-person (also known as "A2P") SMS termination.

On 21 June 2024, the ACCC published the final report for the domestic mobile terminating access service. The ACCC's final position was to extend the declaration for a further 5 years with no amendments to the service description.

### 4.1.2 Access determination inquiries

The ACCC released its final decision report on the superfast broadband access service access determination inquiry on 12 March 2024.<sup>77</sup> This sets the regulated price and non-price terms of access, in the absence of commercial agreement, to NBN-like fixed line broadband services on non-NBN networks and is effective from 1 September 2024 until 1 March 2027. The ACCC has decided to continue to benchmark regulated prices to NBN prices for equivalent residential broadband services, to enable consumers and businesses to find retail offers that are similar to, or better than, those available on the NBN.

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<sup>76</sup> ACCC, '[Public inquiry into the declaration of the domestic transmission capacity service, fixed line services and domestic mobile terminating access service](#)', 31 May 2023, accessed 16 October 2024.

<sup>77</sup> ACCC, '[Superfast broadband access service \(SBAS\) final access determination inquiry 2021](#)', 12 March 2024, accessed 6 November 2024.

On 21 June 2024 the ACCC commenced 3 separate final access determination inquiries to consider the price and non-price terms and conditions of access for 7 services that remain declared following the combined declarations inquiry.

The ACCC released a discussion paper for the voice interconnection services final access determination inquiry in July 2024. This inquiry covers the mobile terminating access service and the fixed terminating and originating access services.<sup>78</sup>

On 30 July 2024 the ACCC released a discussion paper for the final access determination inquiry for the domestic transmission capacity service.<sup>79</sup>

On 4 October 2024 the ACCC published a position paper for the 3 resale fixed line services provided over Telstra's legacy network, which covers the wholesale line rental service, local carriage service and wholesale asymmetric digital subscriber line service.<sup>80</sup>

### 4.1.3 NBN Co Special Access Undertaking

#### SAU variation

In October 2023 the ACCC accepted NBN Co's SAU variation proposal lodged on 14 August 2023. The SAU is a key part of the regulatory framework for the NBN and sets maximum prices and benchmark (minimum) quality standards for retail service providers to access the NBN.<sup>81</sup>

The SAU is expected to remain in effect until 2040 unless NBN Co is privatised, in which case the SAU will make way for the development of a new regulatory framework.

The SAU provides significant benefits in the long-term interests of consumers, such as:

- much greater oversight over the prudence and efficiency of NBN Co's expenditures through a new periodic regulatory review process
- a benchmark service standards framework to improve service quality over time, and links the quality and price of NBN Co's wholesale offers
- moving towards a simpler and more certain wholesale price structure, which will encourage more efficient and competitive retail markets
- establishing a long-term price path that is tied to changes in the CPI until NBN Co reaches annual cost recovery, currently expected in 2030. This will safeguard against wholesale price shocks while allowing NBN Co the opportunity to transition towards efficient cost recovery and become financially viable as a stand-alone business
- a new forum involving NBN Co, retailers, government and consumer representatives, which will report publicly on measures to promote the interests of low-income consumers and encourage digital inclusion. This is intended to assist NBN Co in developing product and pricing proposals that have regard to the interests of low income and other disadvantaged consumers
- bringing all of NBN Co's access networks under a consistent regulatory framework.

NBN Co's variation proposals progressively improved to better accord with the long-term interests of end users. This was realised through direct discussions and engagement with its retailers and other stakeholders that was facilitated by ACCC consultations. Consideration of the long-term interests of end-users was a key requirement in the final decision to either accept or reject NBN Co's SAU variation proposal.

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78 ACCC, '[Voice interconnection services access determination inquiry](#)', 21 June 2024.

79 ACCC, '[Domestic transmission capacity service access determination inquiry](#)', 21 June 2024.

80 ACCC, '[Resale fixed line services access determination inquiry](#)', 21 June 2024.

81 The SAU materials are available on the ACCC website [here](#).

## Tariff List and Pricing Roadmap

The ACCC reviewed NBN Co's updated pricing materials submitted on 1 May 2024 to ensure the new prices proposed met the price control requirements of the varied SAU.<sup>82</sup> The ACCC was satisfied that all requirements were met, including that increases to nominal prices proposed for 2024–25 were within the maximum limits that the SAU allows. These maximum limits include that the forecast increase in:

- weighted average wholesale prices across all wholesale access services is less than the change in the CPI allowance of 4.1%
- the cost to acquire the entry level residential wholesale service has not increased by more than the change in the CPI allowance of 4.1%
- the cost to access other residential wholesale services has not increased by more than the applicable allowance of 5%.

## Cost Allocation Manual

NBN Co was required to submit a Cost Allocation Manual to the ACCC under the SAU, which was received on 16 November 2023. It described in detail the methodology NBN Co would be required to follow to allocate costs between monopoly (core) and competitive services.

The ACCC could approve the proposed Cost Allocation Manual in either the form submitted by NBN Co or a form that incorporated reasonable changes made by the ACCC, which occurred on 15 April 2024 after consulting with NBN Co and stakeholders. With these changes, the approved Cost Allocation Manual provides for enhanced cost attribution and greater rigour and transparency in its application.<sup>83</sup>

## Accounting Procedures

The ACCC approved NBN Co's proposed Accounting Procedures on 19 June 2024, with reasonable changes.<sup>84</sup> The Accounting Procedures establish requirements for NBN Co to specify the nature and form of the financial statements it will produce to satisfy its accounting separation commitments between core and competitive services under the SAU. They also describe the processes that NBN Co will follow to prepare the reports for accounting separation of specified core and competitive services, and provide assurance that accounting separation is consistent with the Cost Allocation Manual.

The approved Accounting Procedures, together with the Cost Allocation Manual, will strengthen the overall regulatory framework, encourage more efficient use of NBN Co's regulated services and discourage anti-competitive practices in related wholesale markets.

## 2022–23 Long term revenue constraint methodology determination

The ACCC was required to publish a long term revenue constraint methodology determination for each financial year since the commencement of the SAU until 30 June 2023, on NBN Co's allowable revenues, regulated asset base and an account to accumulate initial unrecovered costs.

On 6 June 2024, the ACCC accepted NBN Co's proposed long term revenue constraint methodology values (and inputs to those values) in addition to being satisfied that NBN Co's prices did not exceed the regulated price controls at any point during the financial year.<sup>85</sup>

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82 These materials are published on NBN Co's website at <https://www.nbnco.com.au/rsp/special-access-undertaking-sau>.

83 ACCC, '[NBN Co Cost Allocation Manual \(November 2023\)](#)', 16 April 2024.

84 ACCC, '[NBN Co proposed Accounting Procedures](#)', 20 June 2024.

85 ACCC, '[Long Term Revenue Constraint Methodology 2022–23](#)', 3 November 2023.

Future regulatory assessments for the remainder of the SAU term will be made on regulatory cycles of between 3 and 5 years and will include ex-ante and ex-post assessments of the prudence and efficiency of NBN Co's expenditures. This will bring NBN Co's assessment framework in-line with incentive-based regulation used in other industries.

## 4.2 Carrier separation rules

The ACCC is responsible for administering the carrier separation rules in Part 8 of the *Telecommunications Act 1997* (Telecommunications Act).<sup>86</sup> These rules are intended to promote retail competition and choice for consumers on alternative non-NBN fixed line broadband networks. The rules require superfast fixed line residential broadband networks to be operated on a wholesale-only basis unless the network operator obtains an exemption from the ACCC. To obtain an exemption, the operator can either elect to be bound by the ACCC's class exemption or give the ACCC its own functional separation undertaking. This means that a company that controls a superfast broadband network cannot supply retail services over it unless an exemption applies.

In all instances, fixed line network operators must offer wholesale services on an open access and non-discriminatory basis. Network operators that are subject to the ACCC's class exemption must also comply with the ACCC's superfast broadband access determination, which sets maximum wholesale prices and other important terms and conditions for retailers to access their networks (see section 4.1.2).

The ACCC can issue infringement notices or take action in the Federal Court seeking pecuniary penalties for non-compliance with the carrier separation rules, such as a network operator favouring its own retail operations. Recent legislative amendments have increased the maximum penalty the Federal Court can impose to up to \$10 million per contravention.<sup>87</sup>

### 4.2.1 ACCC telecommunications infringement notice guidelines consultation

On 3 June 2024, amendments to the Telecommunications Act came into force that, among other things, enable the ACCC to make guidelines for the issuing of infringement notices for certain alleged contraventions of the Telecommunications Act.

On 17 July 2024, the ACCC issued a consultation paper seeking views from stakeholders on the draft *ACCC Telecommunications (Infringement Notices) Guidelines 2024*, which received one submission from the Australian Communications Consumer Action Network.<sup>88</sup>

The ACCC subsequently made the *ACCC Telecommunications (Infringement Notices) Guidelines 2024*, which came into effect on 31 August 2024. The guidelines inform the ACCC's decision making in relation to exercising its infringement notices power for contraventions of civil penalty provisions relating to Part 8 of the Telecommunications Act. They also provide guidance to industry on the ACCC's approach to the discretionary matters that it would consider when deciding whether to give an infringement notice.

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<sup>86</sup> ACCC, '[Industry guidance on the carrier separation rules](#)', 14 October 2022.

<sup>87</sup> See Schedule 5 of the [Telecommunications Legislation Amendment \(Enhancing Consumer Safeguards and Other Measures\) Act 2024](#).

<sup>88</sup> [Consultation paper on draft ACCC Telecommunications \(Infringement Notices\) Guidelines](#); and [ACCAN submission to the draft guidelines consultation](#).

## 4.2.2 Amendments to the ACCC's Deemed Functional Separation Undertaking

On 9 November 2023, the ACCC released a consultation paper on proposed amendments to the *Telecommunications (Deemed Functional Separation Undertaking) Determination 2020*. Consultation closed on 7 December 2023 and the ACCC did not receive any submissions.

On 5 January 2024, the ACCC issued the *Telecommunications (Deemed Functional Separation Undertaking) Amendment Determination 2024*.<sup>89</sup> The Amendment Determination incorporates stronger obligations to ensure that an eligible network operator's wholesale and retail business units are operated on an arm's length basis. It also incorporates enhanced transparency and reporting obligations to allow for more effective regulatory oversight by the ACCC.

## 4.2.3 Functional Separation Undertaking assessments conducted in 2023–24

### Myport Standard Functional Separation Undertaking

On 13 June 2023, Myport Pty Ltd (trading as Gigafy) submitted a standard functional separation undertaking and a supporting submission to the ACCC in accordance with section 151A of the Telecommunications Act.

Following a public consultation period, on 20 September 2023 the ACCC gave Gigafy a Notice to vary its original undertaking in accordance with subsection 151K(2) of the Telecommunications Act.<sup>90</sup> The notice invited Gigafy to make variations to its original undertaking to incorporate enhanced transparency measures and stronger commitments to operating its wholesale and retail business units on an arm's length basis.

Gigafy submitted a varied undertaking in response to this Notice, incorporating all the ACCC's suggested variations. On 6 November 2023, the ACCC accepted Gigafy's varied undertaking, which came into force on 15 February 2024 and applies for 5 years.<sup>91</sup>

### Uniti Joint Functional Separation Undertaking variation

On 21 April 2024, Uniti Group Limited submitted a proposed variation to its joint functional separation undertaking, which included changes to the specified wholesalers and retailers as well as enhanced transparency and separation commitments, consistent with similar provisions in Gigafy's undertaking and the ACCC's Deemed Functional Separation Undertaking.

The ACCC issued a public consultation paper on 24 April 2024 and did not receive any submissions. On 28 May 2024, the ACCC accepted Uniti's variation to its joint functional separation undertaking.<sup>92</sup>

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89 [Telecommunications \(Deemed Functional Separation Undertaking\) Amendment Determination 2024](#).

90 [ACCC Notice to vary Gigafy standard functional separation undertaking](#).

91 [Gigafy standard functional separation undertaking](#).

92 [Uniti varied joint functional separation undertaking](#).

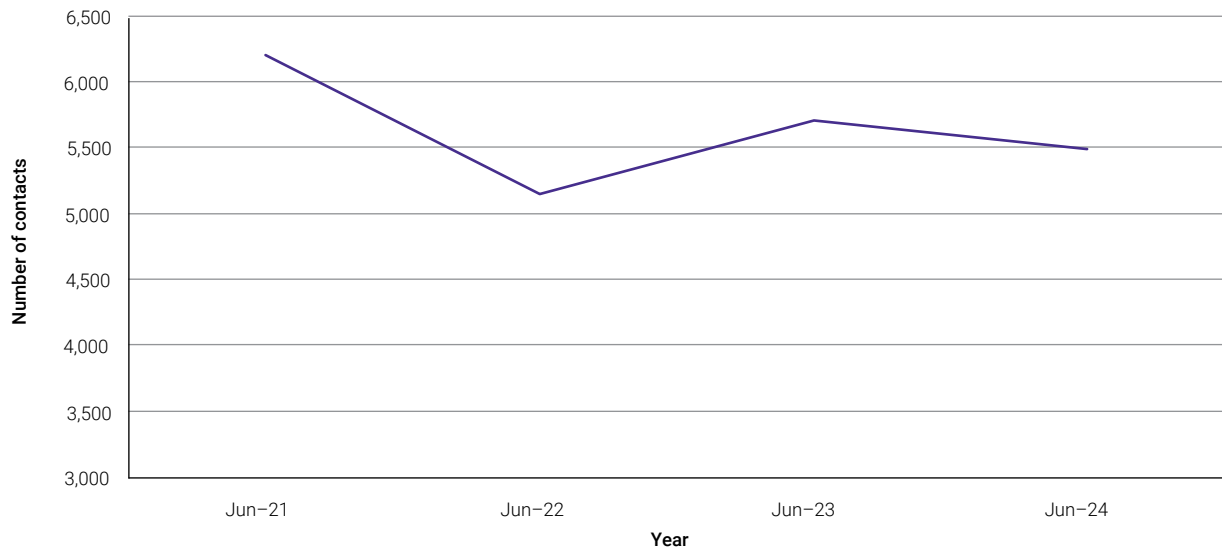
## 4.3 Telecommunications complaints data

### 4.3.1 Complaints to the ACCC

Consumers and small businesses contact the ACCC about a wide range of issues. The ACCC is not a complaint-handling body and does not resolve individuals' complaints. The ACCC focuses on situations that may impact vulnerable consumers, harm the competitive process, or result in widespread consumer or small business detriment. Individuals may be referred to dispute-handling organisations, such as the Telecommunications Industry Ombudsman, that are better placed to assist.

The ACCC also uses information received in complaints to help identify issues for further investigation that may have industry-wide applications. During 2023–24, the ACCC received a total of 5,488 complaints relating to telecommunications matters, which is a small decrease from 5,705 in 2022–23. Figure 28 below illustrates the trend.

**Figure 28:** Communications-related complaints to the ACCC, 2021 to 2024



As shown in Table 2 below, complaints in most individual categories declined in 2023–24 compared to the previous year, with only 'Guarantee as to acceptable quality' contacts rising. Approximately 72% of the complaints were referred to other agencies, mainly to the Telecommunications Industry Ombudsman and state-based agencies that are tasked with resolving consumer complaints and investigating issues outside of the ACCC's remit.

**Table 2: ACCC complaints by alleged conduct type, 2023 to 2024**

Type of conduct	2022–23	2023–24
18 – Misleading or deceptive conduct	2,496	2,414
54 – Guarantee as to acceptable quality	1,770	1,821
General – No CCA Issue	1,036	914
36 – Wrongly accepting payment	727	418
29(1)(m) – False rep: Exclusion or effect of any condition, warranty, guarantee, right or remedy	468	221
29(1)(b) – False representations (services – standard, quality, value or grade)	271	203
60 – Guarantee as to due care and skill	248	120
29(1)(i) – False representation price	195	86
29(1)(a) – False representations goods – standard, quality, value, grade, composition, style etc.	191	78
56–57 – Guarantee relating to the supply of goods by description, sample or demonstration	108	77

Table 3 below shows that complaints both increased and decreased across the major retailers in 2023–24, with Optus decreasing significantly.

**Table 3: Number of contacts by telecommunications provider, 2023 to 2024**

Telecommunications provider	2022–23	2023–24
Telstra (includes Belong and Boost)	699	663
Optus (includes Amaysim)	842	662
TPG Telecom (includes iiNet, Internode and Vodafone)	413	484
Vocus (includes Dodo and iPrimus)	47	67
Superloop (includes Exetel)	40	51
Aussie Broadband	29	22
Tangerine Telecom	16	32
Opticomm	8	31
Spintel	20	16
Uniti Retail	4	19

Table 3 does not account for the number of customers or service types for each provider, so the relative ranking may not be a full indicator of a providers' complaints ratio.

For other telecommunications complaints data, see the Australian Communications and Media Authority's [2023–24 complaints data](#) and Telecommunications Industry Ombudsman's [2024 Annual Report](#).

## 4.4 Enforcement, compliance, mergers and authorisations

### 4.4.1 Optus & TPG Telecom Multi-Operator Core Network (MOCN) agreement

The ACCC commenced an informal review of Optus and TPG Telecom's Multi-Operator Core Network agreement on 12 July 2024.

Optus and TPG Telecom entered into 3 interrelated agreements: a MOCN Services Agreement, a Spectrum Authorisation Agreement and a Site Transfer Agreement (together, the Proposed Arrangement). The MOCN Services Agreement is for a period of 11 years, with a 5-year option for TPG Telecom to extend the term.

Following a period of public consultation and assessment, the ACCC announced on 5 September 2024 that it would not oppose the Proposed Arrangement between Optus and TPG Telecom.

In not opposing the Proposed Arrangement the ACCC concluded that the proposals were not likely to substantially lessen competition in any relevant market. The ACCC found that the Proposed Arrangement was likely to enhance TPG Telecom's competitive position in retail and wholesale mobile markets relative to Telstra and Optus during the term of the agreements. The ACCC considered that any reduction to competition is generally limited to regional areas where TPG Telecom is not a vigorous and effective or potential competitor and faces barriers to investment at scale to become such a competitor in the future.

The ACCC also found that Optus would likely be better able to compete with Telstra from its access to additional spectrum in regional areas and its accelerated rollout of its 5G network.

### 4.4.2 NBN retailers put on notice and consumers encouraged to shop around

In early November 2023, ahead of NBN Co implementing its new wholesale prices, the ACCC encouraged consumers to shop around for their NBN plans.<sup>93</sup> At the same time, the ACCC wrote to NBN retailers to put them on notice that they were expected to be upfront with consumers about the nature and drivers of any retail price changes they were considering and about the suitability of their NBN plans for different households. The ACCC reiterated these messages at the Comms Day Summit in April 2024.<sup>94</sup>

The retail prices of NBN plans are set by retailers, who compete and offer a wide choice of plans to retail consumers. However, consumers can be impeded from finding the plans in the market that represent good value for their individual circumstances if retailers do not provide accurate information in their marketing and other communications with consumers. This includes by suggesting that less expensive plans on offer from themselves or other retailers would be unlikely to reasonably meet the customer's needs.

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93 ACCC, '[NBN retailers on notice as Australians urged to shop around for deals](#)', 2 November 2023, accessed 6 November 2024.

94 Ms Anna Brakey, ACCC Commissioner, '[ACCC's latest work in the telecommunications sector – speech to the Comms Day Summit](#)', 30 April 2024.

### 4.4.3 Optus's alleged unconscionable conduct

On 31 October 2024, the ACCC commenced proceedings in the Federal Court alleging that Optus Mobile Pty Ltd engaged in unconscionable conduct in contravention of the Australian Consumer Law.<sup>95</sup> The ACCC alleges that Optus acted unconscionably in its dealings with about 429 consumers by engaging in inappropriate sales conduct and/or pursuing consumers for debts, including when it knew contracts were created fraudulently.

## 4.5 Monitoring and reporting

### 4.5.1 Mobile Infrastructure Report

The Mobile Infrastructure Report is an annual publication that provides analysis on changes in mobile infrastructure and coverage. The analysis is based on information collected from Optus, Telstra and TPG Telecom under the Audit of telecommunications infrastructure assets record keeping rule. The Mobile Infrastructure Report is typically published alongside disclosure of the underlining data provided by the mobile network operators.

This report and the accompanying data disclosure is intended to provide transparency and accountability over the investments in mobile infrastructure that has occurred over time. This helps consumers in making informed choices in selecting mobile services and assist policy makers in considering measures that address mobile coverage issues.

The Mobile Infrastructure Report 2024 was published on 8 November 2024.<sup>96</sup>

### 4.5.2 Measuring Broadband Australia program reports

The ACCC's Measuring Broadband Australia program continues to promote consumer choice in broadband services, providing transparent and independent information to inform consumers' purchasing decisions. The program promotes greater performance-based competition and fosters better internet performance throughout the country, encouraging retailers to deliver the speed and quality that consumers have paid for at times when consumers are most likely to use their services.

### Quarterly reports

The ACCC released Measuring Broadband Australia reports in September 2023, December 2023, March 2024 and June 2024.

Our reports found that, on average, broadband retailers are continuing to deliver download speeds to consumers that are close to their maximum plan speeds. For example, the average download speed across all retail service providers on NBN fixed line connections during busy hours (7–11 pm) was 99.8% of plan speed in our June 2024 report.<sup>97</sup>

Further, our June report noted that fibre-to-the-premises technology appears less prone to frequent outages. While each broadband technology can provide a similar experience without delays, fibre-to-the-premises connections may perform better and have fewer outages than any other NBN connection type. In comparison, Australians with fibre-to-the-node and hybrid fibre coaxial connections are more likely to experience frequent outages.

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95 ACCC, '[Optus in court for alleged unconscionable sales and debt collection](#)', 31 October 2024, accessed 12 December 2024.

96 ACCC, '[Mobile Infrastructure Report 2024](#)', 8 November 2024, accessed 20 November 2024.

97 ACCC, '[Measuring Broadband Australia – Report 25 – June 2024](#)', 26 June 2024, accessed 25 October 2024.

Our March 2024 report observed improvements in download speeds on very high-speed services during periods of peak demand.<sup>98</sup> Download performance in the busy hours improved significantly for users of NBN 'Home Ultrafast' 1,000 Mbps services, with 100 Mbps and 250 Mbps NBN plans also marginally improved due to the removal of CVC charges for these plans.

Upload and download speeds improved for NBN fixed line broadband services in both urban and regional Australia, with our December 2023 report indicating a narrowing gap in performance between regional and urban areas. The average download speed for consumers in urban areas (cities with a population of at least 10,000 people) during busy hours increased to 99% of maximum plan speeds in September 2023, compared to 96.8% in February 2022. For regional consumers, the average busy hour speed increased from 94.2% of plan speeds to 97.2% over the same period.<sup>99</sup>

In September 2023 we reported that NBN services are providing good support to popular business applications used by small and medium Australian businesses. This is particularly the case for applications hosted within Australia. The applications included video conferencing applications, as well as email, accounting, e-commerce and customer relationship management platforms.<sup>100</sup>

Funding for the Measuring Broadband Australia program is currently due to end on 30 June 2025.

### **4.5.3 Record keeping rule for NBN service quality and network performance**

On 5 April 2024 the ACCC published new record keeping rules relating to NBN Co's service quality and network performance.<sup>101</sup> The record keeping rules commenced on 1 July 2024 and require NBN Co to collect data relating to its service quality and network performance and report this data to the ACCC.

It covers a range of metrics across connections, service assurance, appointment keeping and network outages and availability. The record keeping rules will further improve NBN Co's transparency and accountability relating to its service quality and whether these are meeting customer expectations.

Under the record keeping rules NBN Co will report quarterly to the ACCC with the first report for the September 2024 quarter due by 30 November 2024. From 2025, the quarterly reports will be provided within 30 days after the end of the quarter.

### **4.5.4 New record-keepers added to existing record keeping rules**

On 15 November 2023 the ACCC released a consultation paper seeking views on proposed changes to the Internet Activity record keeping rule and the Audit of telecommunications infrastructure assets record keeping rule.

These minor amendments were to update the rules to reflect the participants in the market, by removing Spirit Telecom, Harbour ISP and MyRepublic and adding in Maret Infrastructure and Uniti Internet. The ACCC published its final decision on 20 December 2023, which was to remove Spirit Telecom and add Maret Infrastructure to the Audit of telecommunications infrastructure assets record keeping rule and remove Harbour ISP and MyRepublic and add Uniti Internet to the Internet Activity record keeping rule.<sup>102</sup>

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98 ACCC, '[Measuring Broadband Australia – Report 24 – March 2024](#)', 27 March 2024, accessed 25 October 2024.

99 ACCC, '[Measuring Broadband Australia – Report 23 – December 2023](#)', 12 December 2023, accessed 25 October 2024.

100 ACCC, '[Measuring Broadband Australia – Report 22 – September 2023](#)', 6 September 2023, accessed 25 October 2024.

101 ACCC, '[NBN service quality and network performance RKR](#)', 5 April 2024.

102 ACCC, '[2023 amendments to record keeping rules](#)', 20 December 2023.

On 8 August 2024, the ACCC commenced a consultation seeking views on its proposal to add Starlink to the Internet Activity record keeping rule. On 25 September 2024, the ACCC amended the rule to add Starlink Internet Services Pte Ltd as a record keeper and introduce the requirement to report on wholesale non-NBN satellite services.<sup>103</sup> This update will provide the ACCC with a more accurate insight into retail and wholesale broadband markets and assist in conducting its regulatory functions, especially as regional and remote areas transition from legacy services.

## 4.6 Advice, advocacy and consumer education

### 4.6.1 Spectrum allocations limits advice

#### Request for advice – 3.8–3.95 GHz apparatus licences

Spectrum is a scarce and essential input to the provision of wireless services. The ACCC has an interest in ensuring that spectrum allocations promote competition in downstream markets that rely on spectrum as an input.

On 8 February 2023, the ACMA requested ACCC advice on allocation limits for the allocation of area-wide apparatus licences in the 3.8–3.95 GHz band (3.8 GHz band) in metropolitan and regional areas. The spectrum is of interest to various providers, including the mobile network operators and smaller private wireless network operators.

The ACCC provided its advice to the ACMA on 29 September 2023. The ACCC published its advice on 15 February 2024.<sup>104</sup>

In the advice, the ACCC noted that allocation would have the most impact on the private wireless enterprise market where the mobile network operators compete with smaller and new entrant private wireless network operators. The ACCC supported the ACMA's proposed use of allocation limits and recommended that the ACMA impose extended time periods for the allocation limits. Extended time periods would ensure that smaller and new entrant private wireless network operators have sufficient opportunities to compete with incumbent operators.<sup>105</sup>

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103 ACCC, '[Internet Activity record keeping rule](#)', 25 September 2024.

104 Further information on this allocation limits process can be found [here](#).

105 The ACCC's advice is available [here](#).

## 4.6.2 Telecommunications Consumer Protections Code

Telecommunications services are essential, and the ACCC remains of the view that consumer safeguards should be directly regulated through enforceable industry standards.

A focal point of consumer issues this year has been the ACMA's review of the Telecommunications Consumer Protections Code. The ACCC's June 2024 submission to the review noted that although some positive changes had been made to the draft Code throughout the process, it continues to suffer fundamental shortcomings that weaken its ability to protect consumers. These include:

- The failure to recognise telecommunications as an essential service, which undermines interpretation and enforcement of all provisions.
- Continued support for commission-based selling. This produces misaligned incentives, encouraging staff to engage in harmful conduct and take advantage of consumers at all stages of the sales process.
- The draft Code's general tendency to fall back on process-based requirements rather than guaranteeing consumer outcomes (such as a duty not to enter into unsuitable contracts or to deliver fair and reasonable outcomes for consumers).
- The defective monitoring and compliance system that limits the accountability of CSPs for non-compliance and partial compliance with the Code.<sup>106</sup>

As we noted in our submissions to this review (in June 2023,<sup>107</sup> January 2024,<sup>108</sup> and June 2024), voluntary codes raise enforceability issues. These include that:

- the ACMA does not have the power to directly alter the code to ensure it remains fit for purpose
- the ACMA's powers in enforcing the code are constrained by a cumbersome two-step regulation process
- the financial penalties available to the ACMA are very small.

Following these and other submissions by the ACCC, elements of the Telecommunications Consumer Protections Code have been incorporated (or directed by the Minister for Communication to be incorporated) into Industry Standards to enable improved enforceability.

In 2023, the ACCC made a submission<sup>109</sup> to a consultation process that resulted in a Ministerial Direction being issued to the ACMA. This direction was to create a Financial Hardship Industry Standard to help protect vulnerable consumers, and the Standard came into effect in February 2024.

The ACCC continues to push for the Telecommunications Consumer Protections Code to be strengthened and entirely uplifted into an enforceable industry standard.

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106 ACCC, '[Review of the Telecommunications Consumer Protections Code: ACCC response to the substantive draft of the TCP Code package](#)', June 2024, accessed 6 November 2024.

107 ACCC, '[Review of the Telecommunications Consumer Protections Code: ACCC submission](#)', June 2023, accessed 6 November 2024.

108 ACCC, '[Review of the Telecommunications Consumer Protections Code: ACCC response to 17 November 2023 Drafting Committee package](#)', January 2024, accessed 6 November 2024.

109 ACCC, '[ACCC submission on proposed Telecommunications Financial Hardship Industry Standard](#)', November 2023, accessed 6 November 2024.

### 4.6.3 Other ACCC submissions

In 2024, the ACCC provided short submissions to several public inquiries.<sup>110</sup>

#### USO review

On 1 March 2024, the Department of Infrastructure, Transport, Regional Development, Communications and the Arts published the ACCC's submission to the 'Better Delivery of Universal Services' review.

The ACCC's submission outlined the key principles which it considered underpinned the better delivery of universal voice and broadband services.

It also made recommendations across a number of other relevant areas, including the Universal Service Obligation, payphones, access and affordability and alternative voice service technologies.

#### ACCC submission to the 2024 Regional Telecommunications Review

In July 2024, the ACCC provided a submission to the triennial Regional Telecommunications Independent Review Committee.<sup>111</sup> The submission primarily focused on mobile services, broadband services, consumer protections, universal service arrangements, disaster resilience and emergency, and government and private investment.

The ACCC made the following key points in its submission:

- Consumers in regional, rural and remote areas require improved support and information when experiencing network transitions, with information required from the outset through to the completion of any transition.
- Mobile network operators should be required to use common methodologies and input parameters for producing coverage maps, so coverage can be compared accurately by not just consumers, but also policy makers and regulators. We continue to be disappointed by industry's reluctance to ensure a more comparable approach.
- Additional consumer safeguards containing well-defined standards will be required as the universal services framework adapts to meet consumer expectations and the emergence of new technologies.
- While the overall performance of fixed broadband in regional areas has improved, reliability and underperforming services continue to be a greater concern for regional users than their urban counterparts.
- While government co-contribution programs will continue to play a key role in improving regional infrastructure and coverage, they should be targeted and utilise appropriate models to encourage competition.

The Regional Telecommunications Independent Review Committee delivered its final report to the Minister for Communications on 13 December 2024.

#### Telecommunications Numbering Plan

On 3 June 2024 the ACMA commenced a review of the Telecommunications Numbering Plan 2015 and associated instruments, before they sunset on 1 April 2025. Under the Telecommunications Act, the ACMA cannot make or vary a numbering plan without first consulting the ACCC.<sup>112</sup>

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110 The ACCC's submissions are available [here](#).

111 ACCC, '[2024 Regional Telecommunications Review – ACCC Submission](#)', July 2024.

112 Section 461 of the *Telecommunications Act 1997*.

The ACCC's submission highlighted the integral role numbering plays in the regulatory framework, and the importance of safeguarding the integrity of numbering through consumer trust in the allocation of numbering. Our submission also advocated for clear guidance and rules, particularly in relation to complex and disputed practices.

## Expiring spectrum licences

The ACMA is considering the future of spectrum licences set to expire between June 2028 and October 2032. The majority of these spectrum licences are currently held by the mobile network operators.<sup>113</sup> The ACCC made a number of submissions to consultation processes relevant to the expiring spectrum licences.

### ACMA's Stage 1 consultation

In August 2023, the ACCC made a public submission in response to the ACMA's stage 1 consultation paper, which sought comments on the ACMA's approach to expiring spectrum licences. The submission noted that the ACMA's expiring spectrum licences can significantly impact the mobile services market and encouraged the ACMA to explore future arrangements that reduce barriers to new entry.<sup>114</sup>

### ACMA's Stage 2 consultation

In June 2024, the ACCC made a public submission in response to the ACMA's stage 2 consultation paper, which, amongst other things, sought views on the effectiveness of alternative licence conditions and other mechanisms in achieving policy outcomes of greater coverage and more efficient use of spectrum.<sup>115</sup>

The ACCC's submission noted that there is merit in assessing whether some form of use-it-or-lose-it provisions could be practically implemented in Australia to encourage more efficient use of spectrum. The ACCC also noted that without a public inquiry, it is not possible at a point in time to speculate whether regulated mobile roaming would promote the long-term interests of end-users. It also noted that any such inquiry would need to have regard to the likely impact of emerging technologies such as LEO satellite services on competition in the mobile services market.<sup>116</sup>

### Ministerial Policy Statement for expiring spectrum licences consultation

In April 2024, the ACCC provided a submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts' consultation on a draft Ministerial Policy Statement that the ACMA must have regard to with respect to those spectrum licences. The draft ministerial policy statement proposed a range of policy objectives relevant to the expiring spectrum licences process, including promoting competitive markets and facilitating opportunities for new entry and use cases. The ACCC's submission expressed support for the proposed policy objectives.<sup>117</sup>

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113 More information is available on the [ACMA website](#).

114 ACCC submission is available on the [ACMA website](#).

115 More information is available on the [ACMA website](#).

116 ACCC submission is available on the [ACMA website](#).

117 ACCC submission is available [here](#).

## 4.7 Telstra’s Structural Separation Undertaking and Migration Plan

### 4.7.1 Telstra’s compliance with structural separation undertaking

Under its 2012 Structural Separation Undertaking and Migration Plan, Telstra is subject to a range of obligations relating to the progressive migration of fixed voice and broadband services from its legacy network to the NBN.<sup>118</sup>

Section 105C of the Telecommunications Act provides that each financial year, the ACCC must monitor and report to the Minister for Communications on any breaches by Telstra of its Structural Separation Undertaking. The ACCC completed its assessment of Telstra’s compliance with its Structural Separation Undertaking for 2022–23, and published the report on its website on 20 May 2024, following its tabling in Parliament.<sup>119</sup>

The report detailed that Telstra’s compliance with its Structural Separation Undertaking obligations in 2022–23 was satisfactory overall. Some instances of Telstra’s non-compliance occurred due to actions taken by Telstra to ultimately protect consumers from disconnection where no alternative service was available. Further, the instances of non-compliance were reflective of the scale of the migration process.<sup>120</sup>

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118 Telstra, ‘[Structural Separation Undertaking given by Telstra Corporation Limited to the Australian Competition and Consumer Commission under section 577A of the Telecommunications Act 1997](#)’, 23 February 2012 (including variations up to 19 June 2013); Telstra, ‘[Migration Plan given by Telstra Corporation Limited to the Australian Competition and Consumer Commission under section 577BDA of the Telecommunications Act 1997](#)’, 24 August 2011.

119 ACCC, ‘[Telstra’s Structural Separation Undertaking 2022–23](#)’, 20 May 2024.

120 ACCC, ‘[Telstra’s Structural Separation Undertaking 2022–23](#)’, 20 May 2024, p 2.

# 5. Appendix

## 5.1 Pricing data tables

### 5.1.1 Annual price changes (%) – advertised price

**Table 4:** Advertised price changes (%) for the 25th percentile from 2019–20 to 2023–24

	2019–20	2020–21	2021–22	2022–23	2023–24
NBN	6.1	0.1	7.2	0.0	-2.8
Non-NBN	8.3	0.0	7.7	7.2	5.4
Non-NBN (including home wireless broadband)					
Post-paid mobile phone	0.4	0.0	0.0	0.0	19.2
Pre-paid mobile phone	-13.9	16.2	-19.7	7.1	16.7
Total mobile phone	-13.9	16.6	-4.0	4.1	0.0
Mobile network operators			0.0	0.0	12.5
Sub-brands			-19.7	0.0	25.0
Mobile virtual network operators			0.0	0.0	25.0
Mobile broadband	-14.9	0.0	0.0	0.0	10.0

Source: ACCC estimates based on information from retailers' websites.

**Table 5:** Advertised price changes (%) for the median from 2019–20 to 2023–24

	2019–20	2020–21	2021–22	2022–23	2023–24
NBN	1.2	6.3	4.7	6.6	-10.4
Non-NBN	7.2	6.6	0.1	12.5	5.6
Non-NBN (including home wireless broadband)					
Post-paid mobile phone	-2.8	2.9	23.6	-10.1	6.3
Pre-paid mobile phone	-6.5	0.0	0.0	6.7	2.1
Total mobile phone	-2.0	2.1	0.0	0.0	7.1
Mobile network operators			10.0	5.5	-5.2
Sub-brands			0.0	3.3	0.0
Mobile virtual network operators			0.0	0.0	13.3
Mobile broadband	-12.5	12.9	-11.5	0.0	14.4

Source: ACCC estimates based on information from retailers' websites.

**Table 6:** Advertised price changes (%) for the 75th percentile from 2019–20 to 2023–24

	2019–20	2020–21	2021–22	2022–23	2023–24
NBN	0.0	11.1	9.0	4.6	-7.9
Non-NBN	12.5	0.0	11.1	10.0	8.2
Non-NBN (including home wireless broadband)					
Post-paid mobile phone	0.0	0.0	16.0	-9.5	14.3
Pre-paid mobile phone	-6.6	3.4	-11.1	12.5	0.0
Total mobile phone	-1.8	1.8	7.4	-6.7	0.0
Mobile network operators			7.7	-2.9	-1.5
Sub-brands			0.0	0.0	0.0
Mobile virtual network operators			12.5	-11.1	22.5
Mobile broadband	-16.8	10.2	-9.1	0.0	16.0

Source: ACCC estimates based on information from retailers' websites.

## 5.1.2 Annual price points (\$) – advertised price

**Table 7:** Annual price points (\$) for the 25th percentile from 2019–20 to 2023–24

	2019–20	2020–21	2021–22	2022–23	2023–24
NBN	\$69.95	\$69.99	\$75.00	\$75.00	\$72.93
Non-NBN	\$64.95	\$64.95	\$69.95	\$74.98	\$79.00
Non-NBN (including home wireless broadband)					\$74.95
Post-paid mobile phone	\$24.99	\$25.00	\$25.00	\$25.00	\$29.80
Pre-paid mobile phone	\$21.43	\$24.90	\$20.00	\$21.43	\$25.00
Total mobile phone	\$21.43	\$24.99	\$24.00	\$24.99	\$25.00
Mobile network operators		\$40.00	\$40.00	\$40.00	\$45.00
Sub-brands		\$24.90	\$20.00	\$20.00	\$25.00
Mobile virtual network operators		\$20.00	\$20.00	\$20.00	\$25.00
Mobile broadband	\$20.00	\$20.00	\$20.00	\$20.00	\$22.00

Source: ACCC estimates based on information from retailers' websites.

**Table 8: Annual price points (\$) for the median from 2019–20 to 2023–24**

	2019–20	2020–21	2021–22	2022–23	2023–24
NBN	\$79.95	\$85.00	\$89.00	\$94.90	\$85.00
Non-NBN	\$75.00	\$79.95	\$80.00	\$90.00	\$95.00
Non-NBN (including home wireless broadband)					\$89.95
Post-paid mobile phone	\$35.00	\$36.00	\$44.50	\$40.00	\$42.50
Pre-paid mobile phone	\$32.14	\$32.14	\$32.14	\$34.29	\$35.00
Total mobile phone	\$34.29	\$35.00	\$35.00	\$35.00	\$37.50
Mobile network operators		\$50.00	\$55.00	\$58.00	\$55.00
Sub-brands		\$29.99	\$30.00	\$31.00	\$31.00
Mobile virtual network operators		\$30.00	\$30.00	\$30.00	\$34.00
Mobile broadband	\$35.00	\$39.50	\$34.95	\$34.95	\$40.00

Source: ACCC estimates based on information from retailers' websites.

**Table 9: Annual price points (\$) for the 75th percentile from 2019–20 to 2023–24**

	2019–20	2020–21	2021–22	2022–23	2023–24
NBN	\$90.00	\$100.00	\$109.00	\$114.00	\$104.99
Non-NBN	\$90.00	\$90.00	\$99.97	\$110.00	\$119.00
Non-NBN (including home wireless broadband)					\$113.00
Post-paid mobile phone	\$50.00	\$50.00	\$58.00	\$52.50	\$60.00
Pre-paid mobile phone	\$46.61	\$48.21	\$42.86	\$48.21	\$48.21
Total mobile phone	\$49.00	\$49.90	\$53.57	\$50.00	\$50.00
Mobile network operators		\$65.00	\$70.00	\$68.00	\$67.00
Sub-brands		\$39.99	\$40.00	\$40.00	\$40.00
Mobile virtual network operators		\$40.00	\$45.00	\$40.00	\$49.00
Mobile broadband	\$49.90	\$55.00	\$50.00	\$50.00	\$58.00

Source: ACCC estimates based on information from retailers' websites.

