14 August 2026

Michael Drake
A/g General Manager, NBN SAU Unit
Level 17, 2 Lonsdale Street
Melbourne VIC 3000

Re: ACCC Replacement Module Determination – Benchmark service standards – Commitment to review the speed capacity service standards on FTTP and HFC networks and on the fixed wireless network

We refer to your letter dated 12 August 2026. The ACCC has requested that nbn set out in writing its commitment to reviews of the two speed capacity service standards set out in sections 15 and 16 of the draft determination in the event that the ACCC decides to make the proposed service standards in the final determination.

The proposed introduction of the speed capacity service standards for FTTP/HFC and Fixed Wireless during the next Regulatory Cycle represent a significant evolution in service quality commitments on the nbn network. These new benchmarks will provide RSPs with enhanced transparency regarding how capacity on the nbn network is managed, and the typical busy hour speeds that this capacity is designed to support across speed tiers.

As noted in our May submission to the draft RMD, introducing these speed-based service standards is a new and untested approach for both nbn and RSPs. It is therefore critical that nbn and industry adopt an evolutionary approach to the design, development and implementation of the new standards, allowing them to mature over time based on operational experience.

To support the ACCC in making the final determination, nbn provides the following commitments:

1. **Review of the proposed new FTTP and HFC speed capacity service standard**

   In the event that the ACCC decides to make the Speed Capacity – Fibre and HFC service standard as proposed in section 15 of Annexure D to the draft RMD (and on the basis that overhead allowance is excluded from the relevant Peak Information Rate (PIR) Thresholds) nbn will undertake a review of that service standard by no later than 31 January 2028. The review will evaluate the performance of the Fibre Network and HFC Network against the relevant Performance Objectives in connection with FTTP and HFC speed capacity, including:

   - performance against the relevant PIR Thresholds; and
   - whether an overhead allowance should be included in the relevant PIR Thresholds.

   nbn will make a copy of the review available to the ACCC.

©2026 nbn co limited | ABN 86 136 533 741
155 Miller Street
North Sydney NSW 2060
info@nbn.com.au
nbn.com.au

2. **Speed Capacity – Wireless Service Standard**

In the event that the ACCC decides to make the Speed Capacity – Wireless service standard as proposed in section 16 of Annexure D to the draft RMD (and reflecting the Performance Objectives proposed by nbn) nbn will undertake a review of that service standard by no later than 31 January 2028. The review will evaluate the performance of the Wireless Network against the relevant Performance Objectives in connection with Fixed Wireless speed capacity.

nbn will make a copy of the review available to the ACCC.

These commitments reflect nbn's intention to ensure that the Benchmark Service Standards remain informed by operational experience, network performance data and evolving customer requirements.

Yours sincerely

[redacted]

Usman Saadat
Executive General Manager – Economic Regulation

©2026 **nbn** co limited | ABN 86 136 533 741

155 Miller Street
North Sydney NSW 2060

info@nbn.com.au
nbn.com.au