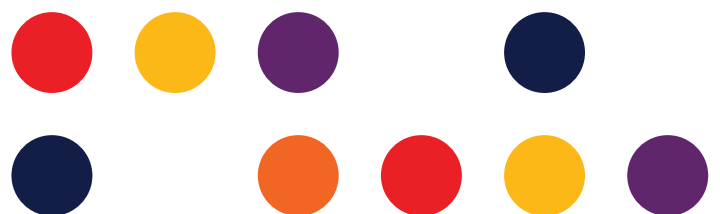


Internet Activity Record Keeping and Reporting Rules (RKR) – Proposed amendments

ACCC

August 2024

Public submission



Submission

TPG Telecom welcomes the opportunity to comment on the ACCC's proposed amendments to the Internet Activity Record Keeping and Reporting Rules (**RKR**) (August 2024).

TPG Telecom supports the ACCC's proposed amendment to:

- add Starlink Australia Pty Ltd (ACN 636 841 533) (**Starlink**) as a record keeper under the Internet Activity RKR;
- amend the requirement on the reporting of non-NBN fixed services information to include details about wholesale services in operation for satellite access technology, and
- make other minor amendments to update references to the relevant ACCC Division responsible for administering the Internet Activity RKR.

TPG Telecom considers these changes are appropriate to reflect the state of the telecommunications market, ensure Starlink is subject to the same transparency requirements as other providers and enable the ACCC to undertake its regulatory functions and responsibilities.

Relevantly:

- Starlink already accounts for a sizeable and rapidly growing customer base. Not including Starlink means excluding more than 200,000 SIOs from the RKR.¹ Without amendment, the RKR will provide an incomplete view of the telecommunications market.
- Starlink now boasts more than double the number of users as NBN's Sky Muster satellite network.² NBN's Sky Muster network conversely is in decline, losing more than 20,000 customers in the 2 years to March 2024.
- The proposed amendments to the RKR are reasonable and necessary to ensure the RKR continues to be a reliable 'single source of truth', which provides information about the telecommunications market to inform the ACCC and other stakeholders. It is imperative this information is reflective of the state of the telecommunications market.
- Accurate information is particularly relevant for regional, rural and remote areas, which we understand form a significant portion of Starlink's customer base. Services provided to these areas are often provisioned under funding provided from State and Federal Government. Accurate information on Starlink's reach can ensure future programs for regional, rural and remote areas are deployed in the most effective manner possible.

TPG Telecom accordingly agrees with the ACCC's proposed amendments to the RKR.

¹ Ry Crozier, IT News, *Starlink's rise draws more ACCC attention*, August 2024, <<https://www.itnews.com.au/news/starlinks-rise-draws-more-acc-attention-610488>>.

² ACCC, *NBN Wholesale Market Indicators Report*, May 2024, <<https://www.accc.gov.au/by-industry/telecommunications-and-internet/national-broadband-network-nbn-access-regulation/nbn-wholesale-market-indicators-report/march-quarter-2024-report>>.