



Proposed changes to the NBN Services in Operation Record Keeping Rules

Consultation Paper

Date

20 October 2021

Australian Competition and Consumer Commission

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Executive summary

This consultation paper seeks stakeholder views on proposals to introduce new reporting requirements in the National Broadband Network Services in Operation Record Keeping and Reporting Rules (NBN SIO RKR) and NBN SIO RKR Disclosure Direction that apply to NBN Corporation Limited (NBN Co).

The Australian Competition and Consumer Commission (ACCC) is proposing to amend the NBN SIO RKR to introduce reporting of the following NBN wholesale products:

- Enterprise Ethernet services
- Business Satellite Services.

The ACCC is also proposing to improve transparency by publicly disclosing information already reported under the NBN SIO RKR to provide more detailed Connectivity Virtual Circuit (CVC) information to stakeholders in the NBN Wholesale Market Indicators Report. For example, this could include public disclosure of the following data in the NBN Wholesale Market Indicators Report:

- Total CVC capacity acquired per access seeker or access seeker group
- Average quarterly CVC capacity acquired per access seeker or access seeker group
- Average quarterly CVC utilisation per access seeker or access seeker group
- Average weekly CVC utilisation by POI or by state or territory.

The ACCC is proposing that NBN Co would only disaggregate the new CVC reporting for access seekers with greater than 1 per cent national market share. The ACCC is also open to stakeholder suggestions regarding alternative methodologies to present CVC utilisation so that it is disclosed in the NBN Wholesale Market Indicators Report in the most practical and beneficial way.

The ACCC is also proposing that NBN Co begin confidentially reporting CVC overage information that NBN Co calculates for access seekers each month. The ACCC is not proposing to publicly disclose data relating to reported overage at an access seeker level, level but is considering doing so at an aggregate level.

The ACCC is also considering improving the reporting requirements for new products or services. The options which we are seeking views on include; incorporating a product release notification requirement on NBN Co; or reducing the timeframe for NBN Co to begin reporting a new service or product. These changes are intended to ensure new services and products are reported in a timely manner.

We are also seeking views on the inclusion of a requirement for NBN Co to report on its performance against the service standards commitments set out in its current wholesale broadband agreement. NBN Co currently reports to access seekers on specified performance metrics. We note that greater transparency measures are being considered as part of the ACCC's current review of the NBN regulatory framework. Further consideration may be given to new or additional rules for record keeping that would provide greater transparency.

The ACCC is also proposing some minor amendments to the existing NBN SIO RKR to correct minor typographical errors.

1. Introduction

1.1. Purpose

The purpose of this Consultation Paper is to seek stakeholders' views on the ACCC's proposed changes to the NBN SIO RKR and the related Disclosure Direction reporting requirements.

1.2. Submission process

The ACCC encourages submissions from all stakeholders including industry participants and end users of telecommunications services.

Submissions should be provided by **5.00pm on 19 November 2021**.

Submission of commercial-in-confidence material

All submissions will be considered by the ACCC as public submissions and will be posted on the ACCC website. Interested parties wishing to submit commercial-in-confidence material to the ACCC should submit both a public version and commercial-in-confidence version of their submission. The ACCC has issued a guideline setting out the process parties should follow when submitting confidential information to communications inquiries commenced by the ACCC. The guideline is available on the ACCC website at:

<https://www.accc.gov.au/publications/communications-inquiries-submitting-confidential-material>

Contact officer and submission lodgement details

Enquiries in the first instance should be directed to Steve Williams on (07) 3835 4602.

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2. The NBN SIO RKR

2.1. Regulatory framework

The Australian Competition and Consumer Commission has the power to collect information from industry to undertake its telecommunications regulatory functions under the *Competition and Consumer Act 2010 (CCA)* and relevant telecommunications legislation.

Section 151BU of the CCA provides that the ACCC may make record keeping rules requiring carriers and carriage service providers to keep records and provide reports on the information in those records to the ACCC. The ACCC cannot require records to be kept unless they contain information relevant to the operation of certain parts of the CCA or certain other legislation.¹

Sections 151BUA, 151BUB and 151BUC of the CCA give the ACCC the power to disclose, or to require carriers or carriage service providers to disclose reports, or extracts of reports, prepared in accordance with a RKR. The NBN SIO RKR Disclosure Direction is made under 151BUC(2)(c) of the CCA.

2.2. Background to the NBN SIO RKR

The NBN SIO RKR was first issued in September 2014 to obtain information relevant to the operation of Part XIB and Part XIC of the CCA. The current NBN SIO RKR is [available on the ACCC website](#) and is in effect until September 2025.

The Disclosure Direction was first issued on 18 March 2016 and requires NBN Co to provide a quarterly 'NBN Wholesale Market Indicators Report' (based on the NBN SIO RKR data) for publication on the ACCC's website. The current Disclosure Direction is [available on the ACCC website](#) and is in effect until the NBN SIO RKR expires.

Legislative basis for the NBN SIO RKR and Disclosure Direction

The reports provided by NBN Co under the NBN SIO RKR and Disclosure Direction are relevant to the following parts of the CCA. Under Part XIB, the ACCC is responsible for enforcing the telecommunications specific anticompetitive conduct provisions as well as providing the Minister with annual reports including a report on competitive safeguards within the telecommunications industry.

The objective of Part XIC of the CCA is to promote the long-term interests of end users (LTIE), which comprises the objectives of:

- promoting competition
- achieving any-to-any connectivity in relation to carriage services that involve communication between end-users, and
- encouraging the economically efficient use of, and investment in, infrastructure supplying telecommunications services.

The ACCC has statutory functions under Part XIC of the CCA including declaration of listed carriage services, conducting inquiries to make access determinations (containing price and non-price terms of access) for declared services, the assessment and enforcement of special access undertakings and the making of binding rules of conduct.

¹ s.151BU (4) of the CCA

The ACCC also has enforcement functions under Part XIC including ensuring access providers (including NBN Co) comply with the standard access obligations set out in sections 152AR and 152AXB of the CCA.

2.3. Use of data collected under the NBN SIO RKR

In order to monitor and assess the state of competition in telecommunications markets, information regarding how competitive dynamics are changing over time and the efficient use of, and investment in, telecommunications infrastructure is important.

In this regard, the NBN SIO RKR provides for the reporting of highly relevant information on demand for NBN Co's wholesale services – in terms of the services in operation (SIOs) – supplied to wholesale access seekers. This wholesale reporting is a strong, but not exact, proxy for retail market demand. The retail broadband market is monitored under the ACCC's Internet Activity RKR.

In relation to the NBN Ethernet Bitstream Service, the reported SIOs are referred to as access virtual circuits (AVCs) and connectivity virtual circuits (CVCs). The NBN SIO RKR requires SIOs to be disaggregated by technology type, service attributes (such as wholesale speed tier and traffic class) and geographical distribution.

Accurate and detailed wholesale market information is critical for the ACCC to monitor and understand how competition is developing over the NBN and whether the use of and investment in telecommunications networks occurs in an efficient manner. Competition and efficient investment are important for economic efficiency, which in turn leads to outcomes that will promote the LTIE.

For example, the ACCC incorporates NBN SIO RKR data when considering various regulatory and enforcement matters, including:

- monitoring and analysis of CVC provisioning (including during the COVID-19 periods)
- investigation into complaints about performance or representations about the NBN
- consideration of NBN access pricing issues
- informing stakeholders and the public of NBN market developments through the dissemination of public information under the Disclosure Direction
- examination and analysis of industry data in conjunction with analysis of the Internet Activity RKR usage data, and
- various declaration and access determination inquiries.

The publication of the NBN Wholesale Market Indicators Report required by the current Disclosure Direction provides a summary of key information contained in the NBN SIO RKR data, including total wholesale services by technology type, traffic class, speed tier, location and total CVC capacity. It also provides market share information for wholesale access seekers with over one per cent of market share along with selected AVC and CVC data for each of the 121 NBN POIs.

The NBN Wholesale Market Indicators Report information is useful to a wide range of stakeholders and provides important transparency for telecommunications market participants. The ACCC's interactive [NBN Wholesale Market Indicators Report webpage](#) provides stakeholders, including media outlets, with easy access to the public information available for analysis.

3. Matters raised in previous consultations

3.1. Stakeholder submissions to 2020 extension consultation

In July 2020 the ACCC undertook a [consultation](#) regarding the extension of the NBN SIO RKR and sought feedback from stakeholders regarding the length of time the RKR should be extended and any other matters. Substantive submissions were received from Telstra, Optus and NBN Co. The ACCC extended the NBN SIO RKR until September 2025 and the following matters were raised by stakeholders which are being considered in this consultation.

3.1.1. Optus argued for extension of RKR to NBN business products

Optus submitted that the NBN SIO RKR should be extended to include NBN business products, such as Enterprise Ethernet.

Optus stated that NBN Co's business products are increasingly contributing a material component to NBN Co's revenue; and the use of NBN products in the enterprise market is growing and looks like becoming the dominant wholesale network in the enterprise market.

Optus noted that NBN Co's participation in the enterprise market may give rise to greater competition issues than its participation in the residential market, due to NBN Co competing directly against other wholesale enterprise networks. Optus suggested that the ACCC should have access to sufficient data so that it can continually assess the level of competition in the enterprise market.

3.1.2. Telstra seeking more information

Telstra submitted that a wider information set regarding the operations of the NBN is required and further public disclosure is warranted. Specifically, Telstra stated that information gaps relating to CVC demand, NBN pricing and service standard arrangements, and NBN Co's costs and revenues need to be rectified.

Telstra submitted that NBN Co's service standard performance directly affects RSP performance and will have flow-on effects on the broadband experience of end users. Telstra stated that it is therefore important that incentives to meet the service standards that apply are promoted by the reporting of performance against those standards.

Telstra also submitted that NBN pricing arrangements, including high prices, pricing uncertainty (i.e. complexity of discounts structure) and gaps in the pricing structure, have led to a range of market failures. Telstra proposed that the following could improve transparency around CVC pricing and demand:

- publishing CVC utilisation information at various geographic levels
- reporting of bundled CVC inclusions by POI, and
- reporting of CVC overage quantities by POI.

3.1.3. NBN Co submits the RKR apply to all superfast broadband providers

NBN Co submitted that all superfast broadband access providers should be subject to the RKR, because information about the rate and take up of superfast broadband access services would provide for a more complete understanding of the development of superfast broadband (at a wholesale level) and downstream competition across the superfast broadband market as a whole.

4. Matters for consultation

4.1. Improving the existing reporting processes

Rule 13 of the NBN SIO RKR requires that NBN Co must begin reporting a new product or service for which NBN Co has a published Standard Form Access Agreement within 90 days of the ACCC providing notification to NBN Co. This relatively long lead time between notifying NBN Co and the data being reported has led to gaps in the reporting of data for particular products, such as the recently introduced Sky Muster Plus service.

The ACCC considers that either NBN Co should be required to notify the ACCC when deciding to introduce new wholesale products or services, and/or the lead time to begin reporting new products or services be reduced, for example to 28 calendar days. This reduction will provide more time for the ACCC to consider whether the new product or service should be considered for incorporation into the NBN SIO RKR reporting framework.

Questions for Stakeholders

- 1) Do you support the introduction of a requirement on NBN Co to notify the ACCC when it is preparing to introduce a new product or service? Please provide reasons.
- 2) Should the notification period in rule 14 be reduced from 90 calendar days to a shorter period, such as 28 calendar days? Please provide reasons.
- 3) Are there any other changes that should be made to the NBN SIO RKR rules to improve reporting timeliness and ensure that information provided to the ACCC and publicly disclosed is relevant?

4.2. Introduction of CVC overage reporting

The ACCC considers that CVC overage is an important element of the costs of access seekers of obtaining NBN TC4 services. As such, we consider that overage should be reported to the ACCC. Given its importance to access seeker costs and product design, there may also be good reasons to publish overage data in some aggregate form in the NBN Wholesale Market Indicators Report.

NBN Co assesses each access seeker's overage liability daily, accounting for the total TC4 CVC capacity provisioned for relevant bundled AVCs in excess of included CVC bandwidth to determine the overage amount payable over a billing period. An overage liability can influence access seekers' cost structures and their end user product features and pricing. Such reporting would likely include for access seekers' billing cycles:

- Overage quantity (Mbps)
- Overage amount payable (\$)
- National Ordered Bandwidth, and
- National Included Bandwidth.

Questions for Stakeholders

- 4) Do you have views regarding the introduction of CVC overage reporting?
- 5) What level of disaggregation should CVC overage reporting be provided?

- 6) Do you have views regarding the publication of high-level CVC coverage information in the NBN Wholesale Market Indicators Report, or elsewhere?

4.3. Proposed changes to the products reported under the NBN SIO RKR

4.3.1. Enterprise Ethernet reporting

NBN currently reports NBN TC2 products (often used by small to medium businesses) under the NBN SIO RKR but does not report Enterprise Ethernet services (used by a wide range of business types).

In order to monitor and assess NBN Co's involvement in the wholesale enterprise market, the ACCC is proposing that NBN Co report on its Enterprise Ethernet services. Reporting is proposed to be disaggregated for each access seeker into the three class of service categories (Low, Medium and High) and by each of the speed tiers offered by NBN Co. The draft Enterprise Ethernet reporting template is at Attachment A.

The ACCC considers that some public reporting of Enterprise Ethernet SIOs may promote competition. It may also assist other related regulatory processes, for example through the publication of nationally aggregated SIO information or more detailed access seeker level disclosure. The ACCC is interested in stakeholder feedback regarding the publication of high-level Enterprise Ethernet reports, particularly whether it would promote competition, or provide other benefits.

Questions for Stakeholders

- 7) Do you have views regarding the size and scope of the enterprise Ethernet market in Australia?
- 8) Do you support the introduction of Enterprise Ethernet reporting? Please provide reasons.
- 9) What level of disaggregation in Enterprise Ethernet reporting should be required?
- 10) What level of detail regarding Enterprise Ethernet services should be publicly disclosed in the NBN Wholesale Market Indicators Report, or elsewhere?

4.3.2. Business Satellite Services

NBN Co provides a variety of business products² via its Satellite network including:

- Access Bandwidth Service Layer 3 (ABSL3)
- Virtual ISP (VISP), and
- Internet of Things (IoT).

The ACCC is interested in stakeholder views regarding the business satellite market (including the above three NBN products) and whether NBN Co should be required to provide periodic reports in relation to its wholesale products supplied as Business Satellite Services.

² <https://www.nbnco.com.au/business/product-and-technical-information/business-satellite-service>

Questions for Stakeholders

- 11) Do you have views regarding the size and scope of the business satellite market in Australia?
- 12) Do you support the introduction of Business Satellite Service reporting? Please provide reasons.
- 13) What level of disaggregation in Business Satellite Service reporting should be required?
- 14) What level of detail regarding Business Satellite Services should be publicly disclosed in the NBN Wholesale Market Indicators Report, or elsewhere?

4.4. Proposed changes to the Disclosure Direction for CVC metrics

Currently, only the aggregated amount of CVC capacity acquired by access seekers at various geographic levels is publicly reported. To improve transparency and make more useful information available to the public and stakeholders, the ACCC is considering the publication of more granular and detailed CVC data, including CVC utilisation data.

Since the March 2018 quarter NBN Co has been providing the ACCC with confidential reports that detail for each of the NBN traffic classes (TC1, TC2 and TC4):

- the CVC capacity acquired for each day
- the average CVC utilisation for each day, and
- the average CVC utilisation for:
 - 7pm-11pm for each day for TC1, or
 - 9am-5pm for each day for TC2, or
 - each hour of the peak period (7pm-11pm) for each day for TC4.

This information covers each CVC provided to each access seeker at all the NBN POIs. Currently, NBN Co reports information relating to over 15,000 CVCs each quarter for the TC1, TC2 and TC4 CVCs.

The reported CVC utilisation data is the amount of traffic in megabits per second (Mbps) occurring on each CVC. During the peak period for TC4 CVCs, NBN Co is required to record the traffic in 15 minute increments and report the average utilisation for each of the four peak period hours.

This CVC utilisation data is obviously voluminous, but it has provided the ACCC with valuable insights into the operations of access seekers in meeting end user demand for NBN network capacity. It has also assisted the ACCC making assessments of NBN Co's responses during the COVID-19 periods. The ACCC considers that publication of some of this currently confidential data is likely to improve competition and ensure a high level of transparency.

4.4.1. CVC acquired

There are a range of options for expanding the reported CVC metrics, both at the national and at the access seeker or access seeker group level (maintaining the current 1 per cent market share threshold).

The ACCC is seeking stakeholder feedback regarding the benefits of publishing new TC4 CVC capacity acquired metrics, such as:

- total CVC capacity acquired by access seeker at the end of each quarter
- average CVC capacity acquired by access seeker across the quarter
- average CVC capacity acquired by access seeker during the last week of the quarter, and/or
- weekly national average CVC capacity acquired for each of the 13 weeks of each quarter.

The ACCC considers that publication of more detailed CVC acquired data is likely to improve transparency and aid in contextualising some of the CVC utilisation data that the ACCC is proposing to publish. For example, CVC acquired and CVC utilisation can be converted to a 'utilisation ratio', which represents how much of the available CVC capacity is being consumed, and how much headroom remains. The closer the utilisation ratio is to 100 per cent, the closer the CVC is to becoming congested.

Questions for Stakeholders

- 15) Do you consider that TC4 CVC capacity acquired data should be publicly reported for access seekers? Please provide reasons.
- 16) Do you consider that TC4 CVC capacity acquired data should be publicly reported each quarter across a wider range of timeframes (e.g. weekly, monthly)? Please provide reasons.
- 17) How should TC4 CVC capacity acquired data be best presented to provide stakeholders with an appropriate level of information?
- 18) Should the ACCC make any changes to TC1 or TC2 CVC capacity reporting? Please provide reasons.

4.4.2. CVC utilisation

CVC utilisation data has never been published by the ACCC, despite utilisation being useful to both consumers and business when considering NBN products and services. The ACCC has undertaken regular internal analysis of the confidential utilisation data provided by NBN Co and it considers that the publication of some selected CVC utilisation data is likely to assist the various NBN stakeholders.

For example, total national utilisation (24-hour period and peak period) would be useful to contextualise the national CVC acquired data. However, stakeholders might also benefit from understanding the aggregate levels of utilisation on a POI by POI basis, or even at an access seeker by access seeker level.

The ACCC notes that utilisation has a wide variety of influences and fluctuates between RSPs according to customer usage profiles, their own business models and time of use, including day of the week. This means that utilisation data should be averaged to some extent over identified periods, such as the last 7 days of the quarter (Week 13).

The ACCC is seeking stakeholder feedback on how utilisation metrics could be published and to what extent these should be disaggregated, such as:

- national average utilisation of Week 13 (day and peak period)
- access seeker average utilisation of Week 13 (day and peak period)

- POI by POI average utilisation of Week 13 (day and peak period), and
- weekly national average for each of the 13 weeks of each quarter.

The ACCC considers that the above information is likely to promote competition by providing a range of stakeholders, including NBN access seekers and NBN end users, with important information regarding NBN usage. The ACCC also notes that some RSPs, such as Aussie Broadband and Superloop, already publish their CVC utilisation data on their websites.

Questions for Stakeholders

- 19) Do you consider that CVC utilisation data should be reported publicly? What level of disaggregation is appropriate? Please provide reasons.
- 20) How should CVC utilisation be best presented to provide stakeholders with appropriate level of information?
- 21) Is using a 7-day average (e.g. for Week 13 of each quarter) appropriate to present utilisation data, or another methodology? Please provide reasons.

At a practical level, some of the proposed CVC metrics could be incorporated into the existing NBN Wholesale Market Indicators Report Table 2 and Table 8, as set out in Attachment B and Attachment C below, but other metrics will require new tables, as set out in Attachment D and Attachment E below.

4.5. Reporting of NBN Co's service standards performance

The ACCC is also considering a matter raised in previous consultations regarding whether to introduce reporting requirements on NBN Co's delivery of wholesale services under the existing NBN SIO RKR. The ACCC seeks stakeholder feedback on the introduction of service standards performance reporting and payment of related rebates by NBN Co.

Any expanded arrangement to include reporting of NBN service standards information is likely to only be provided to the ACCC in the first instance. However we would also consider public reporting arrangements and as such, welcome stakeholder views on the potential for including some of this information in the NBN Wholesale Market Indicators Report, or elsewhere.

The ACCC considers that reporting on the delivery of NBN Co's current service standard commitments will provide the ACCC with more effective oversight on the delivery of NBN wholesale services and the NBN wholesale market.

Reporting metrics on service standards could include for example:

- NBN Co's performance against service levels or performance objectives for the delivery of connections, faults and appointment attendance which could be measured for all retail service providers, or broken down by location, service class and technology type
- network availability
- number of customers impacted by planned/unplanned outages and the length of time that services were unavailable
- number of delayed connections and failed connections on each network
- number of different types of faults on each network. For example, end-user faults, performance incidents and network activities (including percentage of time that services are not available) and the number of services experiencing recurring performance incidents and end-user faults

- speed information for services on the fixed line, fixed wireless and satellite networks. For fixed line services this could include line rate, information rate and achieved peak information rate (PIR) data. For fixed wireless services, average busy hour cell performance by upload and download throughput, list of priority forecast upgrade cells, congested cells and congested backhaul links
- wholesale rebates incurred by NBN Co under WBA4 for missed appointments, late and failed connections, unrectified faults and speed assurance, and
- number of priority assistance customers.

We note that some of this data is already provided by NBN Co to RSPs in performance and operational reporting under the current NBN wholesale broadband agreement (WBA4).³ We also consider that such information is likely to improve the ACCC's assessment of its various regulatory functions under both Part XIB and XIC of the CCA. We would be interested in stakeholder views on whether disclosure of some of this information would also promote competition or improve transparency around the performance of the network. We note that the ACCC is currently considering transparency measures as part of its review of the regulatory framework.

Questions for Stakeholders

- 22) Do you consider that the NBN SIO RKR should incorporate data on NBN Co's delivery of service standards? Please provide reasons.
- 23) If so, which information should be reported and at what frequency? Please provide reasons.

5. Other NBN SIO RKR and Disclosure Direction changes

The ACCC recently added Sky Muster Plus satellite services to the NBN SIO RKR and Disclosure Direction. Please see the [ACCC website](#) for details.

The currently published NBN SIO RKR has a typographical error in rule 14 that incorrectly made rule 14(b) into the first line of rule 15. The correct rule 14 and rule 15 sequence should be:

(14) Subject to Rules 15 and 16, NBN Co must, within 90 calendar days of receiving the written notice provided under Rule 13:

- (a) Establish and maintain an electronic record containing information about the New Network Access Service, Product Component or Product Feature which is equivalent to that required by Rules 6 to 12.
- (b) Comply with the reporting requirements in Rules 18 to 22 in respect of the New Network Access Service, Product Component or Product Feature.

(15) NBN Co can provide written notice to the ACCC which specifies the information it can reasonably provide to the ACCC in respect of the New Network Access Service, Product Component or Product Feature, as the case may be, and, or, the time by which it can provide the information.

The ACCC will amend this section of the RKR as part of the NBN SIO RKR variation process.

³ See section 18 of the Ethernet Service Level Schedule and section 9.3 of the Operations Manual, Wholesale Broadband Agreement.

5.1. Any other changes

The ACCC is seeking stakeholder feedback on any other changes or modifications that might be appropriate for the NBN SIO RKR or Disclosure Direction as the NBN market continues to mature.

Question for Stakeholders

- 24) Should the ACCC make any other changes to the NBN SIO RKR and/or Disclosure Direction?

6. Consolidated list of questions

The ACCC is seeking comment from stakeholders and other interested parties on the questions set out below. Submissions should include reasons providing further detail in relation to the responses.

Improving new product reporting

- 1) Do you support the introduction of a requirement on NBN Co to notify the ACCC when it is preparing to introduce a new product or service? Please provide reasons.
- 2) Should the notification period in rule 14 be reduced from 90 calendar days to a shorter period, such as 28 calendar days? Please provide reasons.
- 3) Are there any other changes that should be made to the NBN SIO RKR rules to improve reporting timeliness and ensure that information provided to the ACCC and publicly disclosed is relevant?

CVC overage reporting

- 4) Do you have views regarding the introduction of CVC overage reporting?
- 5) What level of disaggregation should CVC overage reporting be provided?
- 6) Do you have views regarding the publication of high-level CVC overage information in the NBN Wholesale Market Indicators Report, or elsewhere?

Enterprise Ethernet reporting

- 7) Do you have views regarding the size and scope of the enterprise Ethernet market in Australia?
- 8) Do you support the introduction of Enterprise Ethernet reporting? Please provide reasons.
- 9) What level of disaggregation in Enterprise Ethernet reporting should be required?
- 10) What level of detail regarding Enterprise Ethernet services should be publicly disclosed in the NBN Wholesale Market Indicators Report, or elsewhere?

Business Satellite Reporting

- 11) Do you have views regarding the size and scope of the business satellite market in Australia?

- 12) Do you support the introduction of Business Satellite Service reporting? Please provide reasons.
- 13) What level of disaggregation in Business Satellite Service reporting should be required?
- 14) What level of detail regarding Business Satellite Services should be publicly disclosed in the NBN Wholesale Market Indicators Report, or elsewhere?

CVC Acquired reporting

- 15) Do you consider that TC4 CVC capacity acquired data should be publicly reported for access seekers? Please provide reasons.
- 16) Do you consider that TC4 CVC capacity acquired data should be publicly reported each quarter across a wider range of timeframes (e.g. weekly, monthly)? Please provide reasons.
- 17) How should TC4 CVC capacity acquired data be best presented to provide stakeholders with an appropriate level of information?
- 18) Should the ACCC make any changes to TC1 or TC2 CVC capacity reporting? Please provide reasons.

CVC utilisation reporting

- 19) Do you consider that CVC utilisation data should be reported publicly? What level of disaggregation is appropriate? Please provide reasons.
- 20) How should CVC utilisation be best presented to provide stakeholders with an appropriate level of information?
- 21) Is using a 7-day average (e.g. for Week 13 of each quarter) appropriate to present utilisation data, or another methodology? Please provide reasons.

Service standards performance

- 22) Do you consider that the NBN SIO RKR should incorporate data on NBN Co's delivery of service standards? Please provide reasons.
- 23) If so, which information should be included and at what frequency? Please provide reasons.

Any other matters

- 24) Should the ACCC make any other changes to the NBN SIO RKR and/or Disclosure Direction?

ATTACHMENT A – Proposed format for confidential Enterprise Ethernet service reporting

			CoS-L SIOs																								
State	POI	Access Seeker	10 Mbps	20 Mbps	30 Mbps	40 Mbps	50 Mbps	60 Mbps	70 Mbps	80 Mbps	90 Mbps	100 Mbps	150 Mbps	200 Mbps	250 Mbps	300 Mbps	350 Mbps	400 Mbps	450 Mbps	500 Mbps	600 Mbps	700 Mbps	800 Mbps	900 Mbps	1000 Mbps	Total	

			CoS-M SIOs																								
State	POI	Access Seeker	10 Mbps	20 Mbps	30 Mbps	40 Mbps	50 Mbps	60 Mbps	70 Mbps	80 Mbps	90 Mbps	100 Mbps	150 Mbps	200 Mbps	250 Mbps	300 Mbps	350 Mbps	400 Mbps	450 Mbps	500 Mbps	600 Mbps	700 Mbps	800 Mbps	900 Mbps	1000 Mbps	Total	

			CoS-H SIOs																								
State	POI	Access Seeker	10 Mbps	20 Mbps	30 Mbps	40 Mbps	50 Mbps	60 Mbps	70 Mbps	80 Mbps	90 Mbps	100 Mbps	150 Mbps	200 Mbps	250 Mbps	300 Mbps	350 Mbps	400 Mbps	450 Mbps	500 Mbps	600 Mbps	700 Mbps	800 Mbps	900 Mbps	1000 Mbps	Total	

ATTACHMENT B – Proposed national CVC utilisation table reporting format

Table 2 – Sum of contracted CVC capacity by CVC traffic class and by State or Territory and sum of TC-4 CVC utilisation by State or Territory, DATE

State	Contracted CVC capacity			CVC utilisation - Week 13 Average - 24hrs	CVC utilisation - Week 13 Average - peak period
	TC-1 Mbps	TC-2 Mbps	TC-4 Mbps	TC-4 Mbps	TC-4 Mbps
ACT					
NSW					
NT					
QLD					
SA					
TAS					
VIC					
WA					
Total					

ATTACHMENT C – Proposed POI by POI CVC table reporting format

Table 8 Count of AVCs, sum of contracted CVC capacity and utilisation and count of NBN Access Seeker Groups by Listed POI, DATE

POI Name	State	POI Location	TC1 AVCs		TC2 AVCs		TC4 AVCs		Total CVC (Mbps)			CVC utilisation - Week 13 average - 24hrs	CVC utilisation - Week 13 average - peak period	Access Seeker Groups	
			Fixed	Wireless	Fixed	Wireless	Fixed	Wireless	TC1	TC2	TC4	TC4	TC4	CVC	
Acacia Ridge Depot	QLD	Metro													
Albury	NSW	Regional													
Applecross	WA	Metro													
Aspley	QLD	Metro													
Aspley Depot	QLD	Metro													
Asquith Depot	NSW	Metro													
Ballarat	VIC	Regional													
Bassendean	WA	Metro													

ATTACHMENT D - Proposed access seeker CVC table reporting format

Table NEW - CVC acquired and CVC utilisation - access seekers, DATE

	Total CVC acquired, end of quarter	CVC utilisation - Week 13 average (24hrs)	CVC utilisation - Week 13 average (peak period)
Access Seeker Group	Mbps	Mbps	Mbps
Access Seeker 1			
Access Seeker 2			
Access Seeker 3			
Access Seeker 4			
Access Seeker 5			
Access Seeker 6			
Other Access Seekers			
Total			

ATTACHMENT E – Proposed national weekly average CVC reporting format

Table NEW - national CVC metrics by weekly average													
CVC metric (Mbps)	Week 1	Week 2	Week 3	Week 4	Week 5	Week 6	Week 7	Week 8	Week 9	Week 10	Week 11	Week 12	Week 13
Average CVC acquired													
Average utilisation (day)													
Average utilisation (peak)													