

16 February 2024

Australian Competition and Consumer Commission  
Via email to: [telco.regulation@acc.gov.au](mailto:telco.regulation@acc.gov.au)

[aussiebroadband.com.au](http://aussiebroadband.com.au)

**Re Public inquiry into the declaration of the domestic transmission capacity service, fixed line services and domestic mobile terminating access service – Draft Report**

Aussie Broadband Limited (**Aussie Broadband**) welcomes the opportunity to respond to ACCC's Draft Report on the public inquiry into the declaration of the domestic transmission capacity service, fixed line services and domestic mobile terminating access service. We appreciate the opportunity to provide our views on the services discussed within the report.

Aussie Broadband is broadly supportive of the ACCC's preliminary decisions as detailed in the draft report. We agree with the overall approach taken by the ACCC to determine the services to be declared and provide our further comments for consideration by the ACCC in their final decision.

**Fixed Terminating Access Service (FTAS)**

Aussie Broadband supports the ACCC's draft decision to declare fixed interconnection services, but we propose that the service description be revised to include termination on 13/1300 numbers in addition to geographic numbers to align with current industry trends. We also recommend that the definition make reference to Communications Alliance Guideline G672:2023 Session Initiation Protocol (SIP) Interconnection, reflecting the direction of industry and to provide further guidance.

**Fixed Originating Access Service (FOAS)**

Aussie Broadband proposes an amendment to the service description. We'd like to see this service description omit 13/1300 numbers, as these would be included under the FTAS service description as per our proposed amendment. We also recommend the inclusion of the aforementioned Guideline in this service description.

**Mobile Terminating Access Service (MTAS)**

Aussie Broadband agrees with the ACCC's decision to amend the MTAS service description, and believes this iteration of the description is aligned with current industry practices. However, we disagree with TPG Telecom's proposal to exclude international originating calls from the service description; we view it as an attempt to prevent non-mobile networks from participating in this market. Finally, we support the ACCC's view that the C661:2022 Reducing Scam Calls and Scam SMS Code be used to attack scams rather than via declared services.

**Application-to-Person (A2P) SMS termination**

Aussie Broadband supports the proposal to declare A2P SMS termination. Further, we agree that the issue of scams is best addressed under the C661:2022 Reducing Scam Calls and Scam SMS Code.

Warm regards,

[Redacted signature]

[Redacted contact information]