



Submission on ULLS Draft Pricing Principles

November 2, 2007

The CCC welcomes the opportunity to comment on the Commission's ULLS draft pricing principles. The CCC represents the interests of non dominant telecommunications carriers in Australia. The members of the CCC represent many of the pioneer acquirers of the ULLS service in Australia

The CCC supports the draft ULLS pricing principles published by the Commission in July 2006.

Specifically, the CCC agrees that ULLS prices should:

- Reflect a TSLRIC methodology
- Be geographically deaveraged, consistent with the cost-reflective methodology and previous determinations.

Given the many occasions on which the Commission has considered the appropriate pricing principles for the ULLS and the PSTN OT, the CCC submits that the Commission and industry participants are entitled to be satisfied that the Commission has thoroughly considered the issues. Further, the CCC submits that the reasoning underlying these principles have been tested and found to be sound by the Australian Competition Tribunal.

The CCC submits that access seekers should be afforded the ability to operate with a degree of certainty around the application of these principles. The years of continual dispute and challenge instigated by Telstra that have created a climate of constant regulatory risk for competitors seeking to avail themselves of this important regulated service.

The CCC submits that the Commission should move without further delay to confirm these principles in a final published determination.

Contact

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