

9 September 2014

Robert Wright
Acting Group General Manager
Communications Group
Australian Competition and Consumer Commission
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Dear Mr Wright

Submissions to the ACCC's Fixed Line Services and DTCS Final Access Determination Processes

I am writing with regard to the ACCC's current consultations for the primary pricing inquiries for the Fixed Line Services Final Access Determinations (Fixed Line FAD process) and the Domestic Transmission Capacity Service Final Access Determinations (DTCS FAD process).

Telstra is currently preparing submissions and relevant material in response to the discussion papers released by the ACCC in each of these processes. These responses are due on September 19 for DTCS and September 26 for Fixed Line Services.

As the ACCC is aware, in addition to the primary pricing inquiries for the DTCS and Fixed Line Services, Telstra and other interested parties are also participating in ACCC inquiries with respect to price terms for the Mobile Terminating Access Service (MTAS), as well as the separate consultation on non-price terms and conditions and supplementary charges for all regulated telecommunications access services.

Given the complexity and breadth of issues involved, as well as changes to the timing of responses for the MTAS inquiry, Telstra is concerned that the current due dates for responses to both the Fixed Line Services and DTCS pricing inquiries may not provide sufficient time to adequately address the issues raised by the ACCC.

Telstra is requesting that the ACCC extend the due date for submissions to the DTCS and Fixed Line Services inquiries by one week in each case – to Friday 26 September for DTCS and to Friday 3 October for Fixed Line Services.

Importantly, if the ACCC is amenable to Telstra's request, Telstra considers that these extensions should be granted to all parties, with the ACCC announcing any extension to provide certainty to all parties.

Additional submission on the coverage of the Fixed Line Services FADs

Telstra notes that, to date, the Commission has not sought specific input on the application of the Standard Access Obligations (SAOs) in particular geographic areas in either its FAD non-price and supplementary charges Discussion Paper nor its separate consultation process on its Fixed Services FAD for Primary Prices.

In previous FAD processes, including, the ACCC Discussion Papers in 2011 (for Fixed Services) and 2012 (for Wholesale ADSL), the ACCC has specifically invited comments on this issue.

Telstra intends to submit on the question of the application of the SAOs in particular geographic areas in relation to both price and non-price terms on 10 October 2014.

Please contact me directly if you would like to discuss the matters raised in this correspondence.

Yours sincerely,



Jane van Beelen
Executive Director - Regulatory Affairs
Telstra Corporation Limited