



20 December 2021

Mr Sean Riordan  
General Manager, Communication Markets and Advocacy, Infrastructure Regulation  
Australian Competition and Consumer Commission  
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Dear Mr Riordan,

**Further variation to Telstra's Migration Plan for Multi Dwelling Unit Common Areas and fire alarm and lift phone services**

As the Australian Competition and Consumer Commission (**ACCC**) is aware, we submitted Telstra's proposed variations to our Migration Plan for approval on 13 August 2021 and an amended version on 20 August 2021.

I enclose for your consideration Telstra's further proposed variations to the version of the Migration Plan submitted to the ACCC for approval on 13 August 2021 and amended on 20 August 2021. Telstra requests approval from the ACCC for the enclosed variations as allowed under section 577BF of the *Telecommunications Act 1997* (Cth).

Following industry feedback regarding the disconnection date for Multi Dwelling Unit (**MDU**) Common Areas (**MDUCAs**), we have further amended the Migration Plan to introduce an in-train order (**ITO**) arrangement to apply following the proposed MDUCA Disconnection Date on 18 March 2022.

This further proposed amendment provides more time to customers with services located within MDU Common Areas to migrate them to an alternative network in light of the disruptions caused by COVID-19 in 2021 year and provides customers with clarity as to the revised timeframes and arrangements that will apply to the managed disconnection of these services. The proposal also introduces managed disconnection arrangements for certain fire alarm or lift phone services, being Extended Fire or Lift Services, including an ITO arrangement (which will apply to the disconnection of these services where customers are migrating to a non-nbn technology).

Our Further Varied Migration Plan is provided to you in both 'clean' and continued 'marked up' versions to assist with your review and consultation process. The 'marked up' version shows all changes made from the current Migration Plan (as approved by the ACCC on 6 February 2020). Both documents are dated 20 December 2021 reflecting the finalisation of the drafting within Telstra.



A detailed supporting submission to describe and explain the further amendments is enclosed at **Attachment A** of this letter. We note that NBN Co approves the proposed amendments.

We propose to keep Wholesale Customers and Retail Business Units informed as to the status of the amendments to the proposed MDU Common Area and Extended Fire or Lift Service disconnection arrangements. This includes communicating amendments to the existing process document currently published on [testrawholesale.com.au](http://testrawholesale.com.au).

We would welcome the opportunity to take ACCC staff through the proposed further amendments if that would be of assistance.

Please contact Kim Hilton-Cowie ([kim.hilton-cowie@team.telstra.com](mailto:kim.hilton-cowie@team.telstra.com)) if you have any questions in relation to this matter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Iain Little'.

Iain Little  
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