

28 January 2022

Mr Sean Riordan  
General Manager, Communication Markets and Advocacy, Infrastructure Regulation  
Australian Competition and Consumer Commission  
Level 17, Casselden Place  
2 Lonsdale Street  
Melbourne Vic 3000

Via email: [ssu-migration@accc.gov.au](mailto:ssu-migration@accc.gov.au)

Dear Mr Riordan,

**Further comments on Telstra's proposed variation to its NBN Migration Plan**

Macquarie Telecom Group (**Macquarie**) appreciates the opportunity to comment on Telstra's proposed variation of 20 December 2021 to its NBN Migration Plan (**the Further Varied Plan**).

The changes contained in the Further Varied Plan address the concern about the treatment of 'In-Train Orders' (**ITO**) that we raised in our submission of 21 October 2021.

However, it is not immediately clear what is to happen to those services for which no ITO is in place on 18 March 2022. Ideally, any such services would not face a hard disconnection but instead, as per current practice, would be temporary suspended for a period of 55 days to allow for reactivation and migration within that window. It is unfortunate that some customers may only be prompted into action once a suspension is applied but nonetheless that inertia should be accommodated so as not to unduly preclude their services from being migrated.

Yours sincerely,



Matthew O'Rourke  
Head of Policy & Regulatory Affairs