



7 February 2018

Mr Grahame O'Leary  
Director  
Australian Competition & Consumer Commission (ACCC)

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Dear Mr O'Leary,

***Re: 'Review of the National Broadband Network Services in Operation Record Keeping Rules (NBN SIO RKR) – Disclosure Direction' Consultation Paper***

This letter is in response to the ACCC's Consultation Paper published in December 2017 relating to the Disclosure Direction associated with the NBN SIO RKR. Telstra supports the variations to the Disclosure Direction proposed by the ACCC in the Consultation Paper. The NBN Wholesale Market Indicators Report (WMIR) provides the industry with transparent information about the development of the market for NBN services, and the proposed variations serve to enhance the value of the report. In particular, Telstra welcomes the decision not to require public disclosure of additional CVC data in the NBN WMIR, for reasons stated in previous submissions.

Responses to the specific questions included in the Consultation Paper are provided below.

#	Question	Telstra Response
1	Should the threshold for market share reporting be set at 1 per cent of the total market, or another level, such as 1000 AVCs or 0.1 per cent market share? If another metric is favoured, please explain why.	Telstra does not have a preference in relation to the options proposed, but in principle supports reducing the threshold from the current level.
2	Should the report set out AVCs and CVC information on a POI by POI basis, as proposed in Table 8?	Telstra supports this proposal as it will provide valuable information to access seekers and aggregation providers about NBN take-up on a more granular geographic basis.
3	Should Table 8 be related to Listed POIs only?	Yes – this approach is appropriate.
4	Are the proposed metrics in Table 8 appropriate for	Yes – the proposed metrics are appropriate.

	improving transparency of the development of the NBN wholesale market?	
5	In proposed Table 8, should the information be further disaggregated by access technology type or speed tier?	To further disaggregate the information in the proposed Table 8 by access technology type or speed tier would not materially add to the value of the information and is not warranted.

If you have any questions please contact Geoff Golden on (03) 8694 1428 or [geoff.golden@team.telstra.com](mailto:geoff.golden@team.telstra.com).

Yours sincerely,



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