

4 September 2012

Mr Luis Martinez
Project Officer
Transmission and Facilities Access
Australian Competition & Consumer Commission
SYDNEY NSW 2011

email: Luis.Martinez@accc.gov.au
cc: Grahame.Oleary@accc.gov.au

Dear Mr Martinez

Optus Submission to the consultation on the proposed Section 151DB list of points of interconnection to the National Broadband Network

Thank you for the opportunity to respond to the ACCC Discussion Paper on the proposed Section 151DB list of points of interconnection to the National Broadband Network. Optus has two comments on the proposed format of the public list of NBN POI locations.

First, we note that the corresponding ESA name for each NBN POI has been removed from the current public list compared to the initial public NBN POI list, published December 2010. Optus submits that it should be included in the current public list.

Second, Optus believes that the public NBN POI list should also include sufficient information to allow cross-referencing with the NBN fibre serving areas (FSAs). We note that the number of FSAs served per NBN POI is included in the public list, but there is inadequate information to allow access seekers to determine which FSA is served by which NBN POI. Given that FSA information is publicly available, its inclusion within the public NBN POI list should have no implications for national security and therefore Optus cannot see any reason for its exclusion.

Should you have any questions regarding the information contained in this letter, please contact me on (02) 8082 6454.

Regards,



Luke van Hooft
Manager, Economic Regulation