



Ref: A945014

8 November 2010

Attention: Mr Joshua Davies
Communications Group
Australian Competition and Consumer Commission (ACCC)
Via email: nbnpoiconsultation@acc.gov.au
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Powerlink Queensland Submission: National Broadband Network Points of Interconnect (ACCC Discussion Paper)

Powerlink Queensland welcomes the opportunity to comment on the ACCC's Discussion Paper on Points of Interconnect (POI) to the National Broadband Network (NBN), published on 22 October 2010.

Powerlink is a State Government-owned corporation which owns, develops, operates and maintains Queensland's high voltage electricity transmission network that extends from north of Cairns to the New South Wales border. Powerlink's primary role is to provide a secure and reliable network to transport high voltage electricity from generators to electricity distribution networks, large loads (such as aluminium smelters) and to and from New South Wales via the NSW-Qld Interconnector.

Powerlink's operational communications network is used for the protection of high voltage electricity plant and equipment, managing the transmission supply, electricity metering, and ensuring compliance with the National Electricity Rules. In addition, Powerlink selectively provides limited services to wholesale telecommunications carriers from spare telecommunications capacity where it will not interfere with network operations. This spare capacity is made available on a non-discriminatory basis to all telecommunication carriers on equivalency of standard commercial terms, conditions and pricing.

The ACCC Discussion Paper presents four options for considering the location and numbers of POIs. Powerlink agrees that, on balance, the Composite Model (Option 4) represents the best outcome based on equivalence of service, enabling the lowest-cost solution to access seekers, promotion of competition in retail markets (enabling a wide uptake of NBNCo services), lowering barriers to entry, and promotion of the long-term interest of end users (LTIE).

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Powerlink Queensland is the registered business name of the
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With regard to the ACCC's comments relating to high backhaul prices in non-metropolitan areas deterring entry, Powerlink notes the entry of a number of new providers in the Queensland market in recent times, and the increased competition that has resulted. Powerlink therefore considers that further competition should be encouraged by the ACCC to reduce the impact of monopoly or duopoly characteristics following the roll-out of the NBN. For this reason, Powerlink does not support Options 1 and 2 put forward in the ACCC Discussion Paper, as these are likely to result in reduced opportunities for the development of a competitive backhaul services market.

Powerlink also notes the ACCC's comments regarding uniform wholesale pricing or cap pricing structures as possible ways to address variations in backhaul prices. However, Powerlink considers that intervention mechanisms such as these will potentially stifle investment in the backhaul services markets.

Powerlink would welcome the opportunity to clarify any aspect of this submission. Should you require any further information, please contact Mr Simon Taylor, Manager Network Customers (07) 3866 1101 in the first instance.

Yours sincerely,



Mr Chris Hazzard
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Powerlink Queensland