



ACCC Combined Declaration Inquiry 2023

Telstra Group Limited

Response to ACCC Draft report- FOAS and FTAS Service Description

Public Version

14 March 2024



1 FOAS and FTAS Service Description

1.1 Overview of Telstra's position

As detailed in our primary submission¹ Telstra's primary position is that the service descriptions for both FOAS and FTAs remain fit for purpose and should be retained.

However, if the ACCC proceeds with an altered service description for both FTAS and FOAS, we offer the following comments and suggested drafting amendments in the attached mark up. See Appendix 1 and 2.

- Migrations to SIP Interconnect (SIP IC) are sufficiently progressed that Service Descriptions that are expressly technology neutral can be adopted.
- In addition, some of the TDM specific requirements should be added back for pre-select and override OA which we supply on PSTN only and have not been configured for new SIP IC to support these dwindling legacy cases. Telstra has not built capability to carrier pre-select and override calls on its SIP Interconnect offerings as these legacy call cases will be exited when the PSTN is finally exited. To mandate the inclusion of these call cases on new SIP Interconnect (and in such small numbers) will raise significant unnecessary and inefficient costs for Telstra to build this functionality at such a late stage. Also, we are aware of no carrier who has requested this. On the contrary most carriers are looking to exit pre-select and override and most already have.
- There should be no reference to industry guidelines in the service description. This does not apply to MTAS or any other service description, given that there is no intention that they operate as default terms and conditions in the absence of any agreement. It is confusing to have these references in the fixed service description and not MTAS. Also, these guidelines, including G.572 are merely used as a starting point for bilateral negotiations, they are not intended or designed to operate as default terms and conditions that apply in the absence of agreement. Inclusion here absent industry consultation on detailed implementation of the high-level principles will create confusion for industry where there is none. To the extent more detailed technical standards have been developed at industry level in the case of legacy TDM interconnect, these have already been added back above in relation to pre-select and override calls.
- Finally, the reference to the SIP IC guideline is not fit for purpose as a "default" standard in a declared service description and was never designed this way. The guideline was not intended to apply directly to bilateral terms/negotiations hence, it is inappropriate to include, without a broader inquiry which we consider at this point, is unnecessary.

¹ Telstra, [TELSTRA CORPORATION LIMITED \(accc.gov.au\)](https://www.accc.gov.au)



Appendix 1 – Proposed amendments for the FOAS (showing changes)

An access service for the carriage of ~~voice telephone~~ calls (i.e. ~~voice, data over the voice band~~) to a POI from end-customers assigned numbers from the geographic number ranges of the Australian Numbering Plan and directly connected to the access provider's network. ~~For the avoidance of doubt, the service also includes a service for the carriage of telephone calls from customer equipment at an end-user's premises to a POI, or potential POI, located at or associated with a local switch (being the switch closest to the end-user making the telephone call) and located on the outgoing trunk side of the switch.~~

Channel Capacity

~~In relation to pre-selection and override/access codes,~~ ~~T~~the service will establish a connection for the purposes of voice communication with the standard bandwidth of 3.1kHz.

Services

The service is provided on a call that is made with:

- pre-selection, or
- an access seeker specific code including Special Services codes and number ranges, or
- a long distance, international or shared operator codes dialled with an over-ride/access code in accordance with the Australian Numbering Plan.

Pre-selection and code override services are not declared where connectivity between the enduser directly connected to the access provider's network and a POI is provided in whole or in part by means of a Layer 2 bitstream service that is supplied by an NBN corporation.

Signalling

~~In relation to pre-selection and override/access codes,~~ ~~S~~signals for this service will use CCS#7 signalling. Unless otherwise agreed, this CCS#7 signalling will be in accordance with the ~~NHF/ACIF Communications Alliance~~ Interconnection-ISUP specification.

Nature of switchports

~~In relation to pre-select and override/access codes,~~ ~~A~~at POIs the calls will be delivered to the AS at 2.048Mbit/sec Switchports. The switchports will operate at 2.048Mbit/sec in accordance with the ITU Recommendations G.703, G. 704 and G.732 (Blue Book).

Service and Network Interconnection

~~Unless otherwise agreed, interconnection will be in accordance with Communications Alliance guidelines:~~

- ~~G.538:1999 Interconnection Model,~~
- ~~G.500:2000 Signalling System No.7 – Interconnection ISUP, or~~
- ~~G.572:2023 Session Initiation Protocol (SIP) Interconnection.~~

Definitions

Where words or phrases used in this declaration are defined in the Act or the Telecommunications Act 1997, they have the meaning given in the relevant Act.

In this Appendix:



NBN corporation has the same meaning as in the National Broadband Network Companies Act 2011.

point of Interconnection or **POI** means an agreed location which:

- is a physical point of demarcation between the networks nominated by the access seeker and the access provider; and
 - is associated (but not necessarily co-located with) with one or more gateway exchanges of each of the networks nominated by the access seeker and the access provider in respect of the POIs nominated by the access provider.
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Appendix 2- Proposed amendments for the FTAS (showing changes)

An access service for the carriage of ~~telephone voice~~ calls (i.e. ~~voice, data over the voice band~~) from a POI to end-customer assigned numbers from the geographic number ranges of the Australian Numbering Plan and directly connected to the access provider's network. ~~For the avoidance of doubt, the service also includes a service for the carriage of telephone calls from a POI, or potential POI, located at or associated with a local switch and located on the incoming trunk side of the switch to customer equipment at an end-user's premises.~~

Channel Capacity

~~In relation to pre-selection and override/access codes, t~~The service will establish a connection for the purposes of voice communication with the standard bandwidth of 3.1kHz.

Services

~~The service is provided on a call that is made with:~~

- ~~• pre-selection, or~~
- ~~• an access seeker specific code including Special Services codes and number ranges, or~~
- ~~• a long distance, international or shared operator codes dialled with an override/access code in accordance with the Australian Numbering Plan.~~

~~Pre-selection and code override services are not declared where connectivity between the enduser directly connected to the access provider's network and a POI is provided in whole or in part by means of a Layer 2 bitstream service that is supplied by an NBN corporation.~~

Signalling

~~In relation to pre-selection and override/access codes, s~~Signals for this service will use CCS#7 signalling. Unless otherwise agreed, this CCS#7 signalling will be in accordance with the ~~NHF/ACIF Communications Alliance~~ Interconnection-ISUP specification.

Nature of switchports

~~In relation to pre-selection and override/access codes, a~~At POIs the calls will be delivered to the AS at 2.048Mbit/sec Switchports. The switchports will operate at 2.048Mbit/sec in accordance with the ITU Recommendations G.703, G. 704 and G.732 (Blue Book).

Service and Network Interconnection

~~Unless otherwise agreed, interconnection will be in accordance with Communications Alliance guidelines:~~

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