

**IN THE MATTER OF UNDERTAKINGS 25  
DECEMBER 2005 LODGED BY TELSTRA  
CORPORATION LIMITED WITH THE  
AUSTRALIAN COMPETITION AND  
CONSUMER COMMISSION IN RESPECT  
OF UNCONDITIONED LOCAL LOOP  
SERVICE  
("the Access Undertakings")**

**STATEMENT OF [c-i-c]**

On 1 August 2006, I, [c-i-c] of 300 Latrobe St, Melbourne, in the State of Victoria,  
Manager, state as follows:

1 [removed]

**Background**

2 I was the Product Manager for Unconditioned Local Loop Services ("ULLS") in  
the Domestic Wholesale Marketing Team at Telstra from [c-i-c]. In that role, I was  
responsible for the management of the various issues which arose in relation to  
ULLS, including for example - technical issues, operational issues, pricing issues  
and for the planning and strategy for ULLS.

3 After [c-i-c] preceded me as Product Manager for ULLS. [c-i-c] is no longer  
employed by Telstra.

4 I commenced employment with Telstra on 2 July, 1974. Since this time I have  
filled various technical, operational, process, managerial, IT and product positions.

5 Attached as Attachment A to this statement is a copy of my Curriculum Vitae.

**This statement**

6 In my role as Product Manager for ULLS I was responsible for the development and  
implementation of systems and procedures for the provision of ULLS. This  
included the responsibility for development and implementation of Unconditioned  
Local Loop Carrier Interface System ("ULLCIS", described further below) and the  
operational aspects of ULLS provisioning in Telstra's core systems. As such, I  
played a central role in the implementation of ULLS and interacted with the various

other employees and contractors who contributed to the design and implementation of systems and procedures for the provision of ULLS.

- 7 This statement sets out a description of the work I performed in my role as Product Manager. For all of the activities I undertook as Product Manager for ULLS I acted under the general supervision of the Group Product Manager, Wholesale Interconnect.
- 8 I have also been asked to comment on the tasks undertaken by other Telstra employees in respect of the product management aspect of ULLS, and to estimate the time those persons spent on those activities during the period in which I was the Product Manager for ULLS.

### **Phases of systems and procedures development and implementation**

- 9 ULLS was declared in August 1999. As a result of the declaration of ULLS, Telstra was required to create and implement an ordering and provisioning system to provide ULLS to Telstra's wholesale customers. This system is known as ULLCIS. The building and implementation of ULLCIS was a major project in the implementation of ULLS. The project to build and implement ULLCIS including changes to core systems, as well as design and implement procedures to provide ULLS ("**the ULLS Project**") commenced on **[c-i-c]**.
- 10 Due to time constraints, the ULLS Project was divided into three phases.
- 11 The first phase was the minimal build necessary to allow for the ordering and provisioning of ULLS. This phase began in **[c-i-c]** and was completed on the launch date of ULLCIS being **[c-i-c]**.
- 12 The second phase involved automation of a number of provisioning tasks such as the ordering, provisioning, service assurance, service qualification, resource programming and scheduling. This phase was completed in approximately **[c-i-c]**.
- 13 Phase three involved implementing further automation within ULLCIS and Telstra's other core systems.
- 14 The Unconditioned Local Loop Service (ULLS) Network Deployment Rules (C559) Industry Code ("**ACIF Code**") was being developed from 1998 to August

2001. Accordingly, Telstra implemented the first two phases of the ULLS Project without knowing what the final ACIF Code requirements would be.

### **My role as Product Manager for ULLS**

15 The specific focus of my work changed over the time during which I was Product Manager. For example, between 27 September 1999 and 21 August 2000 I focused more on the ULLS Project. After ULLS was launched, the project management aspects of my role required less time and I focused more attention on traditional product management tasks. Below I have categorised my role into two distinct areas - project related activities and product management activities. While there is a considerable degree of cross-over, this categorisation is useful because it shows the different nature of the tasks I performed at different stages during my role as Product Manager for ULLS.

#### Project related Activities

- 16 Set out below is a description of the type of project-related activities which I undertook as part of the ULLS Project. Specifically, I:
- (a) conducted initial analysis of the ULLS Project, including analysing the ULLS Project against the company's regulatory obligations, strategic plan and market strategy, systems and operational capabilities;
  - (b) assisted the Project Manager and the Project Director with the organisation of the project team;
  - (c) prepared materials including anticipated costs and spend profile for the Investment Management Committee (which was the body within Telstra that approved projects and the allocated funds for commencement);
  - (d) prepared and provided project outlines and key deliverables to the feasibility manager, initiated workshops to identify project requirements, documented the various options available and recommended the best possible solution;
  - (e) worked with the IT Systems Architect to define the work which had to be undertaken to meet the key project deliverables;

- (f) prepared, settled, and obtained sign off for the business case for the ULLS Project and provided this to other business units and then to my superiors for approval by the Board;
- (g) provided direction to the overall project including reviewing and preparing emails, organising and attending meetings and ensuring that contracts and contract schedules were developed and met;
- (h) provided input in relation to proposals for the terms and conditions to be implemented as a result of the project, including reviewing and preparing emails and attending meetings in relation to these matters;
- (i) planned the “go to market” strategy, for example, preparing marketing material, product information sheets, media and customer communications; and
- (j) discussed group and specific customer pricing approvals with Telstra’s regulatory group.

#### Product Management activities

17 In addition to the project related activities discussed above, I also undertook product management activities. Specifically, I:

##### ***(a) Customer meetings and negotiations***

- (i) attended meetings with the customers and Account Managers in relation to pricing, service terms and conditions and technical issues (eg ordering and provisioning, service assurance operation processes and procedures);
- (ii) attended pre-meetings to the above meetings with the relevant team members; and
- (iii) facilitated negotiations between the customers’ staff and the Product Managers on some non-price terms and conditions. The relevant non-price terms included matters such as the method of communication between Telstra and the customer’s organisation

primarily in relation to service assurance but also, to a lesser extent, in relation to ordering, provisioning and billing;

**(b) *Planning and Forecasting***

- (i) together with the Group Product Manager and the Product Planning Group, prepared analysis of sales, market conditions, customer issues and strategies for the product;
- (ii) together with the Group Product Manager and the Product Planning Group, prepared product strategies which formed the basis of the product plan for the following financial year;
- (iii) prepared, finalised and obtained sign off for the quarterly update to the annual product plan;
- (iv) estimated ULLS demand forecasts and updated the Physical Target Percentage (“PTP”) with those forecasts on a quarterly basis; and
- (v) with the Group Product Manager and the Product Planning Group, prepared annual capital expenditure outlines for the following financial year which included a project description, scope, key deliverables and cost estimates;

**(c) *Sales and marketing***

- (i) attended all initial customer ULLS presentations; and
- (ii) undertook monthly service reviews with each customer that acquired ULLS. This would often occur in face-to-face meetings between myself and the relevant customer representatives. A monthly service review was undertaken and a monthly service review form was often completed during the course of those meetings. The form contained an agenda of items for discussion, a list of action points and minutes from the previous monthly service review. Example of matters discussed included:
  - (A) whether orders were being placed in the correct time frames;

- (B) whether orders were being processed within the time frame required by the customer; and
- (C) whether there were any difficulties encountered by the customer, and if so, what steps were being undertaken by Telstra to rectify them;

**(d) *Undertakings and Regulator Queries***

- (i) assisted the Telstra Regulatory team in relation to access undertakings, including reviewing and responding to emails, assisting with provision of information in relation to commercial and operational matters, preparation of responses to queries from the ACCC and attending meetings in relation to those matters;
- (ii) assisted the Telstra Regulatory and Legal teams with customer disputes, including investigating the situation, preparing an appropriate response and taking action if required; and
- (iii) helped Telstra Regulatory prepare for briefings of the ACCC;

**(e) *Management of the service assurance process***

- (i) wrote the Operations and Maintenance Manual (“**OMM**”) for ULLS service assurance;
- (ii) attended meetings with Optus to standardise, and obtain final agreement and sign off for the OMM;
- (iii) established the escalation process for ULLS - that is, the procedure to be followed in the event a customer raised an issues or complaint in relation to ULLS;
- (iv) acted as the informal contact point for technical and non-technical issues and complaints which fell outside the usual escalation matrix. The types of issues and complaints with which I dealt included:
  - (A) rejections of orders placed by the customer via ULLCIS;

- (B) unrealistic timeframes being set by the customer for urgent orders;
- (C) dissatisfaction with staff interactions; and
- (D) any other issues that were encountered by the customer where the customer perceived that they were not being given the level of required support;

**(f) Other daily activities**

- (i) liaised with Account Managers and the provisioning and delivery team regarding:
  - (A) customer concerns or queries in relation to the provision, delivery or the service assurance process;
  - (B) issues raised by the provisioning and delivery team in relation to customer use of ULLS or Telstra's processes such as degradation in line quality. This involved reviewing and responding to numerous emails, attending meetings with the relevant Telstra personnel and, if necessary, the customer. It also included educating Account Managers in relation to ULLS;
- (ii) acted as a point of call for Telstra operational staff, front of house staff and customers experiencing technical problems in relation to ULLS, which involved discussing issues identified by the Telstra provisioning and delivery team relating to the use of IT systems by access seekers. This also involved consideration of the issues, determining appropriate actions to be taken as a result of those issues and directing IT or other technical staff to arrange for those actions to be taken;
- (iii) responded to Account Managers in relation to customer requests on matters such as pricing or other terms and conditions on which ULLS was offered. This included reviewing and preparing emails,

liaising with and attending meetings with the legal team, the Account Managers and, if necessary, the customer;

(iv) supervised staff who acted under my direction from time to time;

**(g) Other weekly activities**

(i) attended weekly meeting with relevant Telstra personnel involved in the delivery of ULLS to discuss mid to long term operational, strategic and customer issues.

18 Between [c-i-c], I spent [c-i-c] of my time on ULLS. From [c-i-c], I spent [c-i-c] of my time on ULLS.

**Other people's roles and activities**

19 Below I describe the other persons who were involved in the ULLS Project as well as ULLS product management activities. For the purpose of completing this part I have made enquiries of [c-i-c] and [c-i-c] who worked on the project with me as Project Director and Project Manager respectively. While these estimates are made to the best of my knowledge, there may have been other people who worked on product management related activities not included in the following paragraphs. This could occur because the following paragraphs only list the people with whom I had direct contact, and other people, of whose contribution I am unaware, may have worked 'behind the scenes' assisting the people described below.

20 I also provide an estimate of the time that each person or team of people dedicated to these tasks. Where the tasks were performed by a team of people rather than an individual the percentage estimated by me is a percentage of full time employees. Thus if the percentage is 150%, that means that this equated to 1.5 full time employees - ie percentage scores in excess of 100% means that more than one person's time (in total) was involved and percentage scores less than 100% for a group of people means that less than the equivalent of one person's time (in total) was involved.

21 From [c-i-c], I supervised a Product Manager who dedicated [c-i-c] of his time to assisting me with ULLS. He (under my supervision) was responsible for ensuring that ULLS was ready for launch including by conducting the trial of ULLS.



- 22 From [c-i-c], I supervised a Portfolio Specialist who spent [c-i-c] of her time directly assisting with ULLS. The Portfolio Specialist performed various day to day tasks such as creating and updating product information and documentation, creating product reporting on ULLS and creating unique ULLS customer codes in Telstra's system databases when a new customer requested ULLS.
- 23 From [c-i-c] responsibility for coordinating the ULLS Project rested with the Project Manager. I estimate that the Project Manager spent [c-i-c] of his time on ULLS during this period.
- 24 From [c-i-c] responsibility for representing Telstra in relation to the ACIF Code negotiations and reporting changes back to the project team (and vice versa) rested with the Manager, Network Regulation. I estimate that the Manager, Network Regulation spent [c-i-c] of his time on ULLS during this period.
- 25 From [c-i-c] responsibility for looking after the customer cabling, wiring and customer premises equipment ("CPE") obligations rested with the Manager, Regulatory (CPE and wiring). I estimate that the Manager, Regulatory (CPE and wiring) spent [c-i-c] of his time on ULLS during this period.
- 26 From [c-i-c] responsibility for ensuring that the business requirements were translated into IT system solutions rested with a person from the Business Unit Relations Group. I estimate that this person spent [c-i-c] of his time on ULLS during this period.
- 27 From [c-i-c] responsibility for all aspects of the ULLS Project including reporting to the steering committee, rested with the Project Director. This person also had responsibility for the development of the ACIF network deployment rules from [c-i-c]. I estimate that during the period from [c-i-c], this person spent [c-i-c] of his time on ULLS and from [c-i-c] spent [c-i-c] of his time on ULLS.
- 28 From [c-i-c] responsibility for ensuring the build of Telstra's systems was proceeding on time and in the right direction rested with the Group Product Manager, Wholesale Interconnect. The Group Product Manager then had overall responsibility for regulatory, commercial, operational and customer aspects and the ongoing life cycle management of the ULLS product. The first Group Product Manager was also involved with ULLS disputes in the Telecommunications Access

Forum. I estimate that the relevant Group Product Manager (who changed over time) spent [c-i-c] of their time on ULLS during the period from [c-i-c].

- 29 From [c-i-c], responsibility for developing activation, assurance and billing processes rested with two people from Telstra Process Area. I estimate that from [c-i-c] these people spent the equivalent of [c-i-c] of a full time employee on ULLS and then from [c-i-c], spent the equivalent of [c-i-c] of the time of a full time employee on ULLS.
- 30 From [c-i-c] responsibility for network and system integration and for writing the internal and external product technical specifications rested with two Network Integration Specialists. I estimate that, in total, these Network Integration Specialists spent the equivalent of [c-i-c] of a full time employee on ULLS during this period.
- 31 From [c-i-c] team members from the Telstra Commercial and Consumer (C&C) Group were responsible for defining and updating processes and procedures to be followed by technical staff in the areas of provisioning and service assurance (ie to assure ULLS and repair faults), and developing and delivering training programs to C&C internal staff. I estimate that from [c-i-c] in total these people spent the equivalent of [c-i-c] of a full time employee on ULLS and then from August 2000 to March 2003, spent the equivalent of [c-i-c] of the time of a full time employee on ULLS.
- 32 From [c-i-c] responsibility for ensuring compatibility with Telstra Equipment Building Access processes and procedures rested with a wholesale Product Manager from the Facilities Access group. I estimate that this person spent [c-i-c] of his time on ULLS during this period.
- 33 From [c-i-c] responsibility for oversight of the IT build requirements rested with the National Wholesale IT Manager. I estimate that the National Wholesale IT Manager spent [c-i-c] of his time on ULLS during this period.
- 34 From [c-i-c] responsibility for the build of ULLCIS and modifying existing systems, systems delivery and systems architecture and subsequent changes rested with a Systems Architect, an IT Manager and three IT personnel. I estimate that from [c-i-c] these people spent the equivalent of [c-i-c] of a full time employee and

then from [c-i-c], spent the equivalent of [c-i-c] of the time of a full time employee on ULLS during this period.

- 35 From [c-i-c] responsibility for ensuring conformity with policy and procedures of Telstra's wholesale business rested with two representatives from the Customer Operations Policy group. Both of these people was also involved with ACIF Unconditioned Local Loop Service - Ordering, Provisioning and Customer Transfer Code development. I estimate that in total these people spent the equivalent of [c-i-c] of a full time employee on ULLS during this period.
- 36 From [c-i-c] responsibility for development of the template contract for the ULLS product rested with the Business Development Manager. This person also was editor of the ACIF Customer and Network Fault Management Code. I estimate that this person spent [c-i-c] of his time on ULLS during this period.
- 37 From [c-i-c] responsibility for ULLS internal processes and procedure for wholesale staff rested with a person from the Customer Delivery Process group. I estimate that this person spent [c-i-c] of their time on ULLS during this period.
- 38 From [c-i-c] responsibility for tracking changes in the IT programs to make sure relevant changes were made to the service assurance systems inside Telstra Business Services rested with representatives from the Telstra Business Services group. I estimate that in total these people spent the equivalent of [c-i-c] of a full time employee on ULLS during this period.
- 39 From [c-i-c] responsibility for training needs analysis, development and deployment of training programs rested with a Training Prime. I estimate that this person spent [c-i-c] of their time on ULLS during this period.
- 40 From [c-i-c] responsibility for wholesale ULLS provisioning and activation, ACIF Operations and provisioning and attending ACIF meetings rested with the Group Manager, Customer Carrier Transfers. I estimate that the Group Manager, Customer Carrier Transfers spent [c-i-c] of his time on ULLS during this period.
- 41 From [c-i-c] responsibility for writing the internal front of house process rested with a representatives from W&I Commercial Delivery Processes. I estimate the relevant person (who changed over time) spent [c-i-c] of their time on ULLS during this period.

42 From [c-i-c] responsibility for managing the impact of ULLS on basic access for PSTN rested with a Product Specialist (Basic Access) from C&C. I estimate he spent [c-i-c] of his time on ULLS during this period.

Dated: 1 August 2006

.....  
[c-i-c]

**ATTACHMENT A TO THE STATEMENT OF [c-i-c]-**