

RG 060903
17 June 2009

Richard Home
General Manager
Strategic Analysis and Development
Communications Group
Australian Competition and Consumer Commission

By email

richard.home@acc.gov.au

Dear Richard,

**Submission to Fixed Services Review Declaration Inquiry for the ULLS, LSS, PSTN OA,
PSTN TA, LCS and WLR Draft Decision**

The Australian Competition and Consumer Commission ("ACCC") has published its draft decision on the Fixed Services Review Declaration Inquiry for the ULLS, LSS, PSTN OA, PSTN TA, LCS and WLR.¹ The ACCC is seeking submissions from stakeholders on the issues raised in the Draft Decision. Accordingly, Macquarie Telecom Pty Ltd ("Macquarie") has prepared this response to the Draft Decision.

Macquarie notes that the ACCC has made a draft decision to extend each of the six service declarations for five years. This would mean that the declarations would expire on 31 July 2014. The key rationale for this draft decision is the need to provide as much regulatory certainty as possible regarding access arrangements that apply to fixed network services. Macquarie fully supports the ACCC's draft decision and the rationale on which it is based.

In light of the detailed analysis undertaken in this and related ACCC inquiries, Macquarie feels that there is very little, if any, more evidence and investigation now required on these matters. Accordingly, Macquarie commends the ACCC on its inquiry and submits that the draft decision be implemented in full and as a matter of urgency.

Should you have any queries in relation to this submission, please feel free to contact me.

Yours sincerely



Chris Zull
Senior Manager - Regulatory & Government

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¹ Fixed Services Review Declaration Inquiry for the ULLS, LSS, PSTN OA, PSTN TA, LCS and WLR, Draft Decision, ACCC, June 2009 ("Draft Decision")