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Doug Cambell
Director - Regulatory
Telecommunications Group
Australian Competition & Consumer Commission
GPO Box 520J
MELBOURNE VIC 3001

By fax: 03 9663 3699

IN COMMERCIAL CONFIDENCE

Dear Doug

**PROPOSED VARIATION TO MAKE THE
GSM SERVICE DECLARATIONS
TECHNOLOGY-NEUTRAL**

PowerTel has noted that the ACCC is seeking comments on its recent discussion paper examining a proposed variation to make the Domestic GSM Originating and Terminating Access Service technology-neutral with respect to technologies currently in use.

With the AMPS mobile network being phased out in 2000, GSM at the time was the mobile technology enjoying unprecedented growth in the Australian telecommunications industry. It made sense for the ACCC to specify and declare Domestic GSM Originating and Terminating Access Service. However, irrespective of the type of technology, we still have a bottleneck facility for mobile termination. With this in mind, and with the introduction of CDMA and implementation of Mobile Number Portability, which provides for mobile number portability within and across both GSM and CDMA technologies, it would make sense to vary the current declaration to remove any specific technology reference.

PowerTel supports the proposed variation to make the GSM service declarations technology-neutral.

If you have further questions, please do not hesitate to contact me directly.

Yours sincerely



Paul Teng
Manager, Regulatory Compliance

15 October 2001