



18 April 2007

Mr Robert Wright
General Manager
Compliance and Regulatory Operations
Communications Group
Australian Competition & Consumer Commission
By email: robert.wright@acc.gov.au

**Public Policy and
Communications**

Unit 11, Level 2
11 National Court
BARTON ACT 2600 Australia

Telephone 02 6208 0740
Facsimile 02 9218 3836

Copy to:
Gwenda Gleeson
Communications Regulatory
Australian Competition & Consumer Commission
By email: gwenda.gleeson@acc.gov.au

Dear Mr Wright

Mobile Terminating Access Service - WIK Model: busy hour statistics

I refer to your letter dated 3 April 2007 in which the Australian Competition and Consumer Commission ("**Commission**") sought Telstra's busy hour ("**BH**") statistics for the purposes of informing the BH parameters in the WIK Mobile Network and Cost Model ("**WIK Model**").

Telstra is keen to assist the Commission to reflect more accurately any country-specific characteristics of the BH in Australia.

1. Telstra believes the average measured proportion of daily traffic in the BH (8.5%) is reasonable.
2. However, Telstra believes that the average number of days per year on which the typical BH is relevant (250), as well as the average traffic per customer during the BH (8.3 milli Erlangs), understate the actual averages (based on Telstra's experience) and together produce a minutes of use figure that is approximately [c-in-c]% lower than expected.

In this regard, Telstra notes that in paragraph 7.7 (page 23) of its submission dated 16 March 2007, there is an error. This paragraph should refer to there being a significantly "lower" not "higher" MOU value in the WIK Model than Telstra would expect as a result of these discrepancies.

This is the public version of Telstra's response with Telstra's confidential information removed. The Commission may disclose this letter.

Yours sincerely

Tony Warren
Executive Director - Regulatory Affairs
Public Policy and Communications