

11 February 2013

Mr Richard Home
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NBN Engagement and Group Coordination Branch
Australian Competition and Consumer Commission
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Dear Mr Home

ACCC Consultation Paper in relation to the NBN Co 2012 Special Access Undertaking – charging for Service Qualification Enquiries

I refer to the submission made by Telstra in response to the ACCC Consultation Paper in relation to the NBN Co 2012 Special Access Undertaking dated 18 January 2013 (the **Submission**).

In the Submission Telstra has raised concerns about the capacity for NBN Co to introduce charges for services which are 'Zero-Priced' at the time the NBN Co SAU is accepted. As also acknowledged by other RSPs in submissions to the ACCC, even a small increase in price can have a very large impact on RSPs, particularly for services which are essential inputs to the supply of downstream services and cannot be substituted.

Telstra is particularly concerned about the prospect that NBN Co may introduce charges for submitting Service Qualification Enquiries.

Service qualification is a necessary and unavoidable step to activating a service. In other words, it is not possible for an RSP to activate a service unless they have first submitted a Service Qualification Enquiry. It follows that the NBN Co SAU must provide certainty for RSPs that they will not be charged for using this basic function when attempting to activate a service.

Telstra acknowledges that the service qualification function may be used by RSPs to undertake bulk Service Qualification Enquiries which are not connected with service activation. In these circumstances, Telstra accepts that it is reasonable for NBN Co to impose an appropriate charge.

I trust this will assist the ACCC with its assessment of the NBN Co SAU and the Submission.

Yours sincerely



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