

28 October, 2016

Mr Philp Mason
Assistant Secretary, Market Structure
Infrastructure Division
Department of Communications and the Arts
By email

Dear Philip

Proposed Extension of Carrier Licence Conditions (Networks supplying Superfast Carriage Services to Residential Customers) Declaration 2014

I refer to the the proposed Carrier Licence Conditions (Networks Supplying Superfast Carriage Services to Residential Customers Declaration 2014 (Amendment No.1 of 2016) that was circulated by the Department on 30 September 2016.

Optus supports the proposal to extend the current Carrier Licence Conditions by 18 months to be given effect to by the proposed amended declaration.

Optus also supports the proposal to improve transparency in relation to compliance with the Licence Conditions by owners of designated superfast broadband networks. However, we propose one change to improve the transparency arrangements. In addition to requiring owners of designated networks to report the total number of carriage services in operation on each designated network (5A(a)(iii)), they should also be required to report the total number of services capable of being served by the designated network. This will assist access seekers to better understand the wholesale opportunity provided by each designated network since it will give visibility of the full footprint of that network and not just the number of active services.

Optus has no further comments on the proposed Carrier Licence Conditions.

Yours sincerely



Andrew Sheridan
Head of Interconnect & Economic Regulation