

4 November 2016

Mr Philip Mason
Assistant Secretary, Market Structure
Infrastructure Division
Department of Communications and the Arts
GPO Box 2154
CANBERRA ACT 2601
By Email: InfrastructureAndAccess@communications.gov.au

Dear Mr Mason

Telstra's Response to the Proposed Extension of Carrier Licence Conditions (Networks supplying Superfast Carriage Services to Residential Customers) Declaration 2014

Telstra welcomes the opportunity to comment on the proposed extension of the Carrier Licence Conditions (Networks supplying Superfast Carriage Services to Residential Customers) Declarations 2014 (**CLC**).

The CLCs were intended to be a short-term measure until Government implemented its proposed long-term reforms to introduce functional separation obligations. As these long-term reforms have been delayed, Telstra agrees the CLCs should be extended until the reforms can be introduced.

Telstra supports the Department of Communications and the Arts' (**DoCA**) preferred approach of pursuing option 3, which extends the CLCs and introduces new transparency obligations. Telstra agrees with the DoCA that the inclusion of the additional transparency obligations, covering carriers who own or control wholesale-only designated telecommunications networks, will likely improve transparency and public confidence that the competition objectives of the CLCs are being achieved.

Telstra supports option 3 as specified in the Regulatory Impact Statement.

Yours Sincerely,



Jane van Beelen
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