



Australian Government

Department of Communications and the Arts

# Review of the 2015 Telecommunications in New Developments (TIND) policy

## Request for Comments

20 November 2019



## 1. Introduction

Telecommunications is a key infrastructure integral to most aspects of everyday life. As such, people moving into new properties expect ready access to modern telecommunications services, and can be disadvantaged if this is not the case.

The provision of telecommunications infrastructure in new developments has a long history, and arrangements between developers and telecommunications providers have evolved over time reflecting changes in technology and services, and in the competitive landscape. Historically, the Postmaster-General's Department, then Telecom, and then Telstra would deploy copper infrastructure in new developments through arrangements with developers, who would provide trenching for pit and pipe infrastructure. After open competition in 1997 new providers emerged and carriers like BES, TransACT, OptiComm, Pivit and Telstra started contracting with developers through negotiations and tenders to service new developments with more advanced solutions like fibre-to-the-premises at additional cost to support increasing customer demand for internet and video products.

With the establishment of the NBN Co in 2009 to provide an alternative to Telstra's fixed line network, it was important that there was a process for continuing to service new developments while this transition took place. Since 2011, the Australian Government has had in place legislative and policy arrangements to facilitate the provision of telecommunications in new developments. The current version of the policy is Telecommunications in New Developments (TIND), released in early 2015.<sup>[1]</sup> Again, these changes show the evolving nature of arrangements in this space.

In light of recent and upcoming changes in the provision of telecommunications in new developments the Department of Communications and the Arts (the Department) is reviewing the 2015 TIND policy. This document is seeking comments from any interested parties including consumers, the telecommunications industry, developers, all levels of government and others.

Comments are sought by **17 January 2020**. Details on how to make comments are in section 6.

Once comments are considered, the Department will prepare advice for the Minister for Communications, Cyber Safety and the Arts, the Hon Paul Fletcher, MP, on possible changes to the policy. Subject to the Minister's views, he may consult on a draft revision to the policy or move to issue a new policy. The objective is to have any new policy in place in advance of 1 July 2020, to coincide with the scheduled completion of the rollout of the National Broadband Network (NBN) and in anticipation of the commencement of the new statutory infrastructure provider (SIP) regime.

To encourage engagement with this process, we have deliberately sought to keep this paper short. It provides key background information, discusses the changes warranting review of the policy, sets out what we consider are the key elements of the policy that should continue, and identifies some particular issues which we think warrant discussion.

This paper seeks comments on the policy as it stands rather than on proposed changes to the policy. This is so we can understand what is working, and what is not, with a view to coming up with alternatives based on real world experience, rather than proposing new approaches in the abstract.

While we have identified particular issues for attention, interested parties should feel free to canvass other aspects of the TIND policy and the provision of telecommunications in new developments as

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<sup>[1]</sup> See: [www.communications.gov.au/policy/policy-listing/telecommunications-new-developments](http://www.communications.gov.au/policy/policy-listing/telecommunications-new-developments).



they consider appropriate and, where they have alternatives, put them forward along with the rationale for the proposals.

The Department's intention is to publish comments unless they raise legitimate issues of commercial confidentiality. This is discussed further in section 6.

## 2. 2015 TIND policy

Like earlier iterations, the 2015 TIND policy provides a framework for providing people moving into new developments with ready access to modern telecommunications infrastructure. It does this by setting out arrangements for developers, carriers and consumers. It recognises that Australia has an open and competitive telecommunications market in which telecommunications carriers compete to provide infrastructure in different developments. It also recognises that there may not always be the commercial incentives to service all developments and providers of last resort may therefore be required.

The following is a short summary of the main elements of the 2015 TIND policy. The original policy is long and detailed and those wanting more detail should refer to the full document.

The policy has two key objectives: to provide people moving into new developments with ready access to modern telecommunications; and to foster competition in the supply of such infrastructure to foster efficiency, innovation and choice.

Under the policy, developers are responsible for organising telecommunications in their developments just as they are responsible for organising other utilities like power, water, drainage and sewerage. This generally involves providing pit and pipe infrastructure<sup>1</sup> and contracting a carrier to install and operate a telecommunications network that will meet the needs of new occupants now and into the future. Given most people occupying new developments expect telecommunications to be readily available, the TIND policy is premised on developers having a strong commercial incentive to provide telecommunications infrastructure.

Developers and other entities that are incorporated are subject to requirements under Part 20A of the *Telecommunications Act 1997* (the Act) to install 'fibre-ready facilities' and penalties, enforceable by the Australian Communications and Media Authority (ACMA), apply if it is not installed before land or premises are sold or leased. These requirements apply nationally, however, a number of exemptions apply, particularly for developments in rural and remote areas that will typically be serviced by wireless and/or satellite technology, which would render pit and pipe unnecessary.

Under the policy, developers can choose who they wish to provide pit and pipe infrastructure. Developers can also use the telecommunications carrier of their choice to provide network infrastructure in a competitive, open telecommunications market. To ensure carriers provide networks of an appropriate standard, the TIND policy envisaged carrier licence conditions would be made under the Act. After consulting on such licence conditions in late 2015 and early 2016, the Government decided that such requirements would be better handled under the proposed new SIP legislation, which is explained further below.

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<sup>1</sup> Technically the legislation refers to 'fibre-ready facilities' but in practice this is generally 'pit and pipe infrastructure' into which fixed-line telecommunications cabling can be installed or pole infrastructure onto which fixed-line telecommunications cabling can be slung at a later date. For convenience, we generally just refer to 'pit and pipe' as this is the most common solution deployed.



If a developer does not choose another carrier, NBN Co Limited (NBN Co) and Telstra act as infrastructure providers of last resort (IPOLRs). That is, they are obliged to provide infrastructure if no other carrier wishes to or the developer wishes to use them.

Under the policy, NBN Co is responsible for broadband infrastructure in areas where it has rolled out its network, or has announced it is rolling out infrastructure in the next 12 months, and, in general, in developments with 100 or more lots deployed over a three year period. In developments of 100 or more lots, NBN Co is expected to provide fixed-line technology as the default. Under the policy, NBN Co is also required to consider providing fixed-line infrastructure where a development is adjacent (i.e. within 1,000 metres) to its fixed-line infrastructure. NBN Co's broad responsibility as broadband IPOLR reflects the Statement of Expectations<sup>2</sup> given to it by the then Shareholder Ministers, the Minister for Communications and the Arts and the Minister for Finance.

Under the policy, Telstra is the IPOLR in most other circumstances. However, as NBN Co has now rolled out or announced the rollout of its fixed-line network nationally by 1 July 2020, it has effectively displaced Telstra as the IPOLR of network infrastructure in its fixed-line footprint. Telstra generally uses the NBN to provide voice services in the fixed-line footprint (where NBN rollout and migration has occurred). However, Telstra remains the IPOLR for voice infrastructure outside NBN Co's fixed-line footprint. Telstra's ongoing role reflects its legal and contractual obligations under the Universal Service Obligation (USO).

All carriers, including NBN Co and Telstra as IPOLRs, are entitled to charge for the infrastructure they provide to developers. Charging reflects the principle that those creating the need for the infrastructure should contribute to its cost. The TIND policy requires NBN Co to charge specified amounts in servicing new developments to create a level playing field and support a competitive telecommunications market for new developments. In summary NBN Co must charge \$400 per unit in a multi-unit development, \$600 per lot in free-standing developments, \$300 when connecting end-users and charges for backhaul, according to a sliding scale. These charges, when considered with the cost per lot of pit and pipe, were designed to reflect the costs and charges estimated for alternative providers in 2014-15. NBN Co was also given the ability to charge for providing services to new developments using fixed wireless and satellite technologies. By requiring NBN Co to apply the charges, the intention was to create a level charging playing field, however, the TIND policy also noted that charges may need to be varied over time given the dynamic nature of the telecommunications industry, and the Government would consult stakeholders prior to any decision.

To further address concerns that NBN Co could enjoy a competitive advantage, the TIND policy includes three other competitive safeguards. NBN Co is to provide access to competitors to backhaul capacity and its business-to-business interface on commercially negotiated terms upon request. The policy also states that NBN Co should not overbuild alternative networks offering NBN-comparable solutions, unless it is commercial for it to do so and Shareholder Ministers agree.

For networks to be NBN-comparable, they should at least provide the same minimum peak information rates as NBN Co (i.e. 25/5 Mbps) and meet relevant wholesale supply requirements. These requirements vary from providing wholesale access subject to regulation by the Australian Competition and Consumer Commission (ACCC) to full structural separation depending on when the network was built. Under proposed changes in the Telecommunications Reform Package<sup>3</sup> to these rules, the default will be strict

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<sup>2</sup> See: [www.communications.gov.au/publications/nbnstatementofexpectations](http://www.communications.gov.au/publications/nbnstatementofexpectations).

<sup>3</sup> See: [www.communications.gov.au/what-we-do/internet/telecommunication-reform-package](http://www.communications.gov.au/what-we-do/internet/telecommunication-reform-package).



structural separation unless the ACCC agrees to functional separation. The restrictions on overbuilding include 40 pre-existing networks designated as 'adequately serving' their communities in 2013-14.<sup>4</sup>

The requirement that any overbuilding by NBN Co be on a commercial basis is largely self-policing because the Statement of Expectations requires NBN Co to operate commercially as the default. Ministerial agreement to overbuilding was included so stakeholders could be satisfied the commerciality of such activity was being examined and there was no misdirection of taxpayer-provided funding.

To help support the TIND policy, the Department put in place the online TIND map, using the National Map. The TIND Map allows carriers to report and present online developments they have contracted to service. This helps developers understand what carriers may be available to approach in their area, it helps consumers understand who the underlying carrier in an estate will be, and it helps NBN Co avoid overbuilding alternative carriers' networks. Given the strong incentives to use the TIND Map, its use is currently voluntary, but under the proposed SIP legislation (see below) mapping will be mandatory.

The TIND policy also indicates that developers, NBN Co and other carriers have considerable flexibility to come up with other innovative approaches for the provision of infrastructure in new developments. Such approaches would, however, need to meet the basic objectives of the policy, namely that occupants of new developments have access to NBN-comparable outcomes.

### 3. Reasons for review

There are a range of reasons to review the TIND policy. If nothing else, the policy is coming up to its fifth anniversary and review after such period is simply good policy practice, particularly in an industry that changes as much as telecommunications. The working assumption has always been the policy would need to be reviewed for this reason alone.

More material are the clear changes in the new developments sector since the policy was put in place and the other changes that are expected by 30 June 2020.

#### *Completion of the NBN*

The TIND policy was put in place at a time when Telstra was still a key provider of fixed-line infrastructure in urban areas and NBN Co was still working hard to roll out its replacement network. Now the NBN is nearing completion. NBN Co has effectively taken on IPOLR responsibility for fixed-line network infrastructure within its fixed-line footprint, that is, basically urban and suburban Australia. As such, NBN Co has displaced Telstra as the fixed-line network provider in this area and Telstra's IPOLR role is now significantly different, effectively limited to voice infrastructure outside NBN Co's fixed-line footprint, consistent with its USO. In this context, Telstra has already announced that it will generally no longer offer infrastructure for new residential developments inside NBN Co's fixed-line footprint. This needs to be reflected in the policy.

#### *Proposed statutory infrastructure provider laws*

In anticipation of NBN Co becoming the primary platform in Australia for broadband and voice services, the Government has indicated it will have the SIP legislation enacted. This is part of the Government's Telecommunications Reform Package, which also includes changes to carrier separation rules and the Regional Broadband Scheme (RBS). The SIP regime will be part of a new Universal Service Guarantee (USG) covering broadband as well as voice, which has historically been covered by the USO.

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<sup>4</sup> See: [www.communications.gov.au/what-we-do/internet/national-broadband-network/nbn-policy-information](http://www.communications.gov.au/what-we-do/internet/national-broadband-network/nbn-policy-information)



The SIP regime will put into law many of the obligations under the Statement of Expectations, and the TIND policy. As such it seeks to address a number of issues with the current policy (i.e. service standards, IPOLR, mapping).

Under these laws, NBN Co will become the SIP as it rolls its network out across Australia and the SIP for the whole of Australia once its network is declared built and fully operational. Similarly, alternative providers contracted to service new developments will be designated as SIPs, for completed networks, or be obliged to nominate as SIPs, for networks completed in future developments. SIPs will have statutory obligations, in their service areas, to supply wholesale broadband services to retail providers that request them so they can supply services to retail customers. SIPs will be obliged to provide the details of their service areas so they can be accurately mapped by the ACMA.

Under the SIP laws, SIPs will need to provide wholesale broadband services that support peak speeds of at least 25/5 Mbps and, on fixed-line and fixed wireless networks, those broadband services will need to be able to support voice services, noting this may be in the form of voice over the Internet Protocol (VoIP). Under the SIP rules, the Minister will be able to set service standards covering a wide range of performance parameters, if warranted, including technical specifications, reliability requirements, connection times, fault repair times and appointment requirements. It is envisaged such standards could play the role previously envisaged under the TIND policy by carrier licence conditions.

The SIP rules do not themselves deal with wholesale supply arrangements. These rules are set out in separate legislation, but the two sets of laws have been designed to work in tandem. NBN Co, as a SIP, will be subject to the separate wholesale-only, open access rules which have applied since it was established. Similarly, other SIPs will be subject to the carrier separation rules under Parts 7 and 8 of the Act, noting amendments to these parts are also proposed by the Government in the Telecommunications Reform Package. Going forward, the general rule will be that alternative networks predominantly servicing businesses may operate on an integrated basis subject to general ACCC access regulation. Networks predominantly servicing residential consumers will be structurally separated, but may be functionally separated with the agreement of the ACCC (i.e. have both network and retail businesses but operated separately).

The SIP legislation as drafted does not seek to regulate developers in organising telecommunications for their new developments. It envisages these matters will still be guided by commercial and policy arrangements for the most part. However, the SIP rules will come into play once a developer has selected a carrier to service its new development, ensuring that carrier services the development and all premises within it on an ongoing basis. As such the SIP legislation will supersede a large part of the TIND policy relating to the obligations of IPOLRs.

#### *Competition in new developments and service outcomes*

There have also been significant changes in competition in the provision of infrastructure in new development since the TIND policy was put in place in 2015.

A number of new carriers have entered the market to service new developments, some carriers servicing new developments have grown in terms of the areas they cover and the numbers of premises they service, and some carriers have also listed on the stock exchange. For example, Uniti has been pursuing a high growth strategy in the new developments market and has acquired the business of Pivit, Clublinks, LBN Co and OPENetworks. Both OptiComm and Spirit have listed on the stock exchange. Total premises serviced by alternative carriers in new developments are currently estimated to number around 400,000.



Alternative networks appear to be attracting business through a range of strategies, including more flexible use of delivery technologies (including wireless for distribution and backhaul), and more flexible charging arrangements than those NBN Co can offer under the 2015 TIND policy and other guidance. The TIND policy noted that this was a possibility and as such a matter that may need to be reviewed in future. In some instances, it appears that alternative carriers may provide developers with infrastructure for little or no upfront charge, recovering the costs over the life of the investment and/or through higher connection charges for premises, when a customer requires a connection. These consumer charges can be significant and potentially unexpected.

Alternative carriers will generally also be subject to the RBS which will collect levies to support the provision of broadband services in NBN Co's fixed wireless and satellite footprints. The RBS is expected to take effect from 1 July 2020.

Despite the growth of alternative carriers, they typically host a limited number of small retail providers on their networks. Larger retailers like Telstra, Optus, TPG, Vocus and VHA often do not supply services on alternative carriers' networks. This contrasts with NBN Co, which, because of its national footprint, is used by the large retail providers and many smaller ones (over 200 retail providers). Some consumers have expressed concern about outcomes in developments serviced by alternative providers, for example, in relation to the type of technology used, cost of connection, limited choice of retailers, broadband speeds and congestion, general service quality, network outages, fault repair times and customer support.

## 4. Ongoing approach

Against this background and looking to the future, the Department considers the broad approach in the TIND policy remains largely appropriate for the future. In this context we would see the following broad features of the current policy continuing.

- **Consumer focus:** Arrangements need to continue so that people moving into new developments have ready access to modern telecommunications that meet their needs. That is, they need access, and access of an appropriate standard. They should also have transparency as to what the telecommunications solution available to them is, and what the costs involved are.
- **Developer responsibilities.** Developers should remain responsible for organising and meeting the costs of pit and pipe infrastructure in a development, and for ensuring telecommunications services are available when people move into premises. This is consistent with their responsibility to organise other infrastructure and consistent with the user pays principle. Equally, consistent with the 2015 TIND policy, there should be scope for developers and carriers to come up with innovative and more efficient delivery options, providing they meet the needs of consumers and are transparent to them.
- **Competition in infrastructure supply:** Australia has had an open market for the supply of telecommunications infrastructure since 1997, including in new developments. There are a range of private sector operators competing with NBN Co in this space. Such competition puts downward pressure on costs, and promotes service innovation. Competition in infrastructure supply should continue.
- **IPOLRs:** While there will generally be strong commercial incentives for carriers to service new developments and connect premises in them, this may not always be the case. There will continue to be a need for an IPOLR until there is a clear case that the market can meet reasonable



telecommunications needs. The SIP legislation, together with the existing USO for voice, will deal with this. NBN Co will be the default provider for Australia, and where a carrier other than NBN Co has a contract to service a development, that carrier would be the IPOLR (and SIP) for the development.

- **Charging:** Servicing new developments comes at a significant cost. As now, carriers should be able to charge developers for providing network infrastructure or employ other cost recovery models. This would include in all areas, whether fixed line or fixed wireless or satellite.

The Department welcomes comments on these broad features of a continuing policy.

## 5. Key issues

By contrast, the Department considers there are six key areas that would benefit from closer examination. Again, these are the matters we consider most clearly warrant attention, but we want to hear of any other issues that interested parties want to raise.

- **Developer compliance:** In the vast majority of cases developers do the right thing and have the right pit and pipe infrastructure installed and contract a carrier to service their project. This is particularly true of large corporate developers. Unfortunately some developers do not follow the policy, causing inconvenience, delays and additional costs for property buyers and carriers. These are typically small unincorporated developers, to whom federal legislation does not apply. In many instances, these seem to be smaller-scale, sometimes one-off ‘mum and dad’ developers with less experience of the development industry. The Department, working closely with industry, has expended considerable resources since 2015 raising awareness of the requirements in new developments, building compliance, and working with states and territories to put in place complementary measures. This has met with some success. For example, Victoria, New South Wales, Queensland, the Northern Territory and the Australian Capital Territory, have put in place complementary planning measures, and they are being considered in Western Australia and Tasmania. However, this work is ongoing. The Department is interested in how compliance could be further improved, including through further awareness raising, further changes to State and Territory planning laws and whether the option of Commonwealth legislation should be examined again.
- **IPOLR:** While IPOLRs need to be a key part of the approach going forward, the arrangements will need to be updated to reflect the changes in the market since 2015 and the proposed SIP legislation. There should no longer be an IPOLR role for Telstra in NBN Co’s fixed-line footprint, although it will continue to have such a role outside that footprint when it comes to voice services (which it may provide using a range of technologies including fixed wireless and satellite). When it comes to NBN Co’s IPOLR role, it is currently obliged by the policy to explain how it decides what technology to deploy in a new development (p.25), to supply fixed-line infrastructure as the default in developments of 100 or more lots (p.22), and to consider providing fixed-line infrastructure where it would be adjacent to (i.e. within 1,000 metres of) existing fixed-line infrastructure (p.24). Issues arise as to whether these matters should be left purely to NBN Co’s commercial judgement or it should continue to be subject to policy or other guidance. With the NBN rollout drawing to a close, recent experience suggests greater clarity may be required in some areas like the treatment of vacant lots, subdivisions and knock-down rebuilds in brownfield areas with established NBN or other networks as well as informal subdivisions (e.g. premises providing flats or boarding) generally.





- **Charging:** As noted above, the 2015 TIND policy includes a range of safeguards designed to help alternative carriers compete with NBN Co in a period of transition, in particular mandatory charging by NBN Co and restrictions on overbuilding by NBN Co. Since that time competitors have grown and appear to be offering products with which NBN Co can have difficulty competing. Unlike them, NBN Co must charge set amounts and/or deliver network solutions of a clear minimum standard. Competitors may offer wireless-based solutions in NBN Co's fixed-line footprint and reduce or waive provisioning costs for developers, potentially shifting these costs to end-users through higher charges. There is an issue then as to whether NBN Co should have greater flexibility as to the amounts it must charge in new developments and its ability to operate commercially and compete. Equally, if some charging constraints continue, there are questions what the level of any floor or ceiling on charges should be. The Department is interested in information on the level of charges imposed by other carriers, including for pit and pipe infrastructure, and receiving comments on these.
- **Overbuilding:** The TIND policy also places constraints on NBN Co overbuilding alternative providers' networks, including in the enterprise/business market. However, these constraints may disadvantage consumers and NBN Co, while providing little real protection for alternative carriers. Consumers are disadvantaged because NBN Co cannot readily provide them with competitive infrastructure without demonstrating to shareholder Ministers the commerciality of the venture for each proposed site. NBN Co is inconvenienced because it faces the burden of having to demonstrate the commerciality of the venture even though it is required by its Statement of Expectations (and the *Corporations Act*) to operate commercially. Alternative carriers have little protection because ultimately NBN Co only needs to demonstrate the overbuilding is commercial to receive approval to do so, and would not seek to overbuild where it is not. As the 2015 policy indicates, overbuilding is largely self-policing: if it is not commercial, NBN Co will not have the incentive to do it. If it is commercial, however, it is consistent with Australia's open and competitive market place and the Statement of Expectations that NBN Co should operate commercially. There are rules under Competitive Neutrality Policy<sup>5</sup>, with which NBN Co must comply. The need to seek the approval of Shareholder Ministers may therefore be unwarranted. This may particularly be the case in the enterprise/business market, given the higher level of competition that exists there.
- **Other competition measures:** The 2015 TIND policy also provided for alternative carriers to have access to NBN Co backhaul and its business-to-business interface. However, these mechanisms have not been utilised. Access to the business-to-business interface was intended to help alternative carriers to broaden the number of retail providers who use their networks. However, industry has not taken this idea forward. The Department is interested in views on why these mechanisms may not have been utilised to date and on what mechanisms could assist end-users on alternative networks to gain access to a broader range of retail providers.
- **Network and service standards:** In the absence of explicit standards, carriers have considerable flexibility as to the network solutions they offer, the prices consumers ultimately pay, and the service standards they provide on an ongoing basis. While not the subject of significant complaint, concerns are raised from time to time about the quality of networks provided, the charging arrangements, overall service standards, and limited choice of retail service providers on alternative networks. Some consumers have expressed frustration that the NBN will not service their area because it is considered to be 'adequately served' by an alternative network. Looking

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<sup>5</sup> see: <http://archive.treasury.gov.au/contentitem.asp?ContentID=275&NavID=020>



forward, related questions go to the upgrade paths for networks and their long term viability and operation of step-in obligations on NBN Co. This is in a context where most fixed-line residential networks are likely to be the sole such network in a locality. The 2015 TIND policy proposed that licence conditions be made in relation to such matters, but these did not proceed on the basis the matters would be better dealt with under the SIP framework, once in place. The Department seeks views on whether network and service standards for new developments should be set and in what areas. The Department is interested in views on what basic minimum requirements, if any, should be set for carriers when servicing new developments and how these would best operate. As noted above, the intention has been for any such measures to be included in the SIP standards. However, other approaches like carrier licence conditions or ACCC regulation could be considered.

In addition to these substantive matters, the Department sees benefit in a revised policy being shorter and more focused. The 2015 TIND policy sought to deal with a wide range of challenging issues in a period of transition and is long and detailed as a result. Some parts of the policy, such as that dealing with alternative provision models, have seen little use. Now that the industry is much further advanced and arrangements are more established, we see scope for a more concise document.

Again, the Department encourages comments on these and any other relevant issues.

## 6. Providing comments

All interested stakeholders wishing to have their views considered on the review of the current TIND policy are invited to provide comments to the Department. All comments must include the name and contact details of the person making the comment and the organisation which they represent (if applicable).

All comments, or parts thereof, will be treated as non-confidential information unless specifically requested, and acceptable reasons should accompany each request. Email disclaimers will not be considered sufficient confidentiality requests.

Respondents lodging comments should be aware that comments (excluding any information agreed to be treated as confidential information) will be made publicly available, including on the Department's website. Comments will be subject to freedom of information provisions. Despite a comment being identified as confidential or sensitive, comments may be disclosed where authorised or required by law, or for the purpose of parliamentary processes.

Questions may be directed to:

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Comments in response to this request should be emailed to:  
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