



13 December 2022

Universal Services Branch  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
Email: [usb@communications.gov.au](mailto:usb@communications.gov.au)

Dear Universal Services Branch

**Consultation on draft Telecommunications (Infringement Notice Penalties) Determination 2022**

In Telstra's view a new infringement notice penalties determination is not necessary to ensure or encourage Telstra's compliance with the CSG and Payphone benchmarks, noting that Telstra has not failed to meet a benchmark since 2013. However, if the Government's position is that a new determination is necessary, we endorse the proposed wording as it effectively reinstates the previous Determination.

Telstra does not support an increase in the number of penalty units we would be subject to for breaches of the benchmarks and notes that the value of penalty units increases over time in any event. Nor would Telstra support an expansion of the service delivery benchmarks covered by the Determination. The current benchmarks reflect the key service deliverables under the USO contract between Telstra and the Commonwealth.

Yours sincerely

