



## **TELSTRA GROUP LIMITED**

Statutory Infrastructure Provider regulated broadband speeds

Submission to Department consultation paper – public version

**27 May 2025**



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## 01 Introductory Comments

Telstra welcomes the opportunity to respond to the Department's consultation paper on increasing the legislated minimum broadband download speed for Statutory Infrastructure Providers (SIPs) from 25 Mbps to 100 Mbps. This proposed change aims to address evolving consumer needs and preferences, driven by rising demand for faster internet speeds and more data, as well as the significant growth in the number of internet-connected devices within households.

This response is prepared from the perspective of an interested party, noting that Telstra is a Carriage Service Provider (CSP) of two SIP network providers, being nbn co and Uniti Group.

We support an increase in the baseline download speed requirement to better adapt to technological advancements and changing consumer needs and preferences. However, we propose that a baseline download speed of 50 Mbps may be more appropriate at this time, as opposed to 100 Mbps. Our position reflects the perceived existing capabilities of SIP networks and the need to avoid potential cost increases being passed on to consumers in association with any required network upgrades to be undertaken by providers to meet enhanced SIP instrument requirements.

We emphasise the importance of maintaining flexibility within the SIP regime to allow for periodic reviews and updates, ensuring that it continues to meet changing consumer needs and preferences. Additionally, we highlight the need for the SIP instrument to provide a regulatory backstop, incorporating minimum standards which SIPs are required to meet and also to be able to support and promote the digital inclusion objective.

Telstra remains committed to working collaboratively with the Department and other stakeholders to achieve the best outcomes for consumers seeking more capable and reliable telecommunications services.

## 02 Responses to questions raised in the discussion paper

The Department's consultation paper has raised four questions for all stakeholders to consider. Telstra sets out its responses within sections 2.1 to 2.4 below.

### 2.1 Do you support an increase to SIP speed requirements?

Telstra supports an increase to the baseline download speed requirement that a SIP is required to offer on reasonable request from a CSP. In our response to the 2024 Regional Telecommunications Independent Review, we stated:

- *Nevertheless, when it comes to the broadband guarantee under the SIP, we do believe it is appropriate for the minimum speed guarantees to take account of customer needs and evolving technologies. We recommend reviewing the current 25/5 Mbps minimum speed guarantee, which seems out of line with the continued expansion of nbn Fibre to the Premises (FTTP) networks and the speeds now available on nbn fixed wireless technologies.<sup>1</sup>*

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<sup>1</sup> Telstra submission to the 2024 Regional Telecommunications Independent Review Committee (RTIRC) Issues Paper, 31 July 2024, page 113 [rtirc-2024-telstra-submission.pdf](#)



The consultation paper is seeking views on transitioning the SIP baseline speed requirements from current 25 Mbps to 100 Mbps. However, within the 2024 Regional Telecommunications Independent Review, we proposed in respect of nbn (which is the default SIP in Australia):

- *Telstra has consistently advocated for nbn to support minimum internet speeds of 50/20 Mbps at affordable wholesale prices. This is the minimum speed ACCAN have also advocated for nbn to make available (for a wholesale charge of \$20 per month), to support digital inclusion for households on low incomes.*<sup>2</sup>

Our view has not changed and we consider that a 50 Mbps download speed would be an appropriate baseline at this time. As noted in the consultation paper, some networks may not be currently capable of supporting download speeds of 100 Mbps across all technologies and / or locations. The SIPs are best positioned to advise on the time it will take for their networks to be upgraded to support 100 Mbps. In the interim, 50 Mbps appears to be an appropriate baseline, supporting changing customer needs and preferences, and also continuing to support digital inclusion with regard to access and affordability.

We consider that the SIP regime should retain enough flexibility for reviews and updates over time to continue to be able to adjust to changing consumer needs and preferences.

## 2.2 What benefits would this deliver to consumers?

The consultation paper highlights the rising demand from households for faster internet speeds and more data associated with streaming services and smart devices, the growth in internet connected devices within households and projections from nbn that this growth will continue in the future. As stated in section 2.1 above, we agree that an increase to the baseline speed requirement that a SIP is required to offer on reasonable request from a CSP will help align to changing consumer needs and preferences.

In accordance with the ACCC's nbn Wholesale Market Indicators Report, we note that 50 Mbps remains the download data rate category with highest number of services and the overall majority of services on nbn continue to have a download data rate of 50 Mbps or less.<sup>3</sup> Our preference for 50 Mbps as the new baseline download speed requirement that a SIP is required to offer will not prevent SIPs from being able to offer services with faster speeds (e.g. 100 Mbps or higher) or slower speeds. Further, the baseline download speed should be continually reviewed over time and adjusted where appropriate.

## 2.3 Should there also be an increase to the current legislated peak upload speeds from 5 Mbps?

In section 2.1 above, we note that Telstra has previously advocated for the baseline SIP upload speed to be increased to 20 Mbps in relation to nbn co, which is the default SIP for Australia.

We consider an increase to the SIP baseline upload speed from the current 5 Mbps, up to 20 Mbps, would benefit consumer needs and preferences. Consumers want faster broadband upload speeds because they increasingly rely on uploading activities like video conferencing, sharing large files, and engaging in online gaming and streaming. This demand is fuelled by the rise of remote work and

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<sup>2</sup> Telstra submission to the 2024 Regional Telecommunications Independent Review Committee (RTIRC) Issues Paper, 31 July 2024, page 116 [rtirc-2024-telstra-submission.pdf](#)

<sup>3</sup> nbn Wholesale Market Indicators Report, December 2024 Quarter, ACCC [December quarter 2024 report | ACCC](#)



learning, the proliferation of cloud services, and the growing popularity of interactive online experiences.

## **2.4 Are there any other changes that you think the department should consider to support better consumer outcomes?**

Below we highlight two areas for consideration that we have previously raised in relation to the SIP instrument, that continue to be relevant in the context of this consultation paper and will assist consumer outcomes. These areas are service quality and digital inclusion.

### **2.4.1 Service Quality and Network Performance:**

Within Telstra's submission to the Department's consultation regarding the draft *Telecommunications (Statutory Infrastructure Providers – Standards, Rules and Benchmarks) Determination 2021*, we highlighted that the SIP legislation and associated SIP instrument should enable and support RSPs to deliver the services their customers want and need:

- *At a minimum, it is important for customers that: (1) their service is connected in a timely manner, with no loss of service during the connection process (including migration, moves, and service transfers); (2) once their service is connected, it works as expected; and (3) if something does go wrong with the customer's service, the issue is rectified in a timely manner.*<sup>4</sup>

Whilst matters have evolved since 2021 in some respects (e.g. with nbn co's Special Access Undertaking (SAU) variation accepted by the ACCC in 2023), we continue to believe that the purpose of the SIP instrument should be to form a regulatory backstop, particularly where gaps in existing regulation / commercial agreements have been identified, setting minimum service standards which SIPs are required to meet. Importantly, the SIP instrument should not conflict with current regulatory instruments (e.g. relevant ACCC access determinations) and should not preclude SIPs from offering better terms.

### **2.4.2 Digital inclusion:**

Within the 2024 Regional Telecommunications Independent Review, we highlighted the importance of the digital inclusion objective in association with the SIP instrument, especially in promoting affordability and access:

- *Affordability is important, and for that reason we support the development of a low-income product at the wholesale SIP level as well as specific government assistance for low-income customers where it is not commercially feasible to provide broadband services at prices they can afford.*<sup>5</sup>

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<sup>4</sup> Telstra submission on draft Telecommunications (Statutory Infrastructure Providers—Standards, Rules and Benchmarks) Determination 2021, Public Version, 15 March 2021, page 4.

<sup>5</sup> Telstra submission to the 2024 Regional Telecommunications Independent Review Committee (RTIRC) Issues Paper, 31 July 2024, page 116 [rtirc-2024-telstra-submission.pdf](#)