



Broadband Today Alliance (Broadband Alliance Inc.)
PO BOX 288
NAMBOUR QLD 4560

NBN Regulatory Review
Department of Communications
GPO BOX 2154
CANBERRA ACT 2601

Dear Sir / Madam

Re: Telecommunications Regulatory Arrangements Consultation Paper

The Broadband Today Alliance (BTA) welcomes the opportunity to make a further submission to the NBN Regulatory Review Panel on telecommunications regulatory review arrangements associated with the National Broadband Network.

The BTA provides the following comments in relation to *Part 2: Rules about the operations of NBN corporations* section of the consultation paper.

NBN Co's ability to supply to Utilities

- Should NBN Co continue to be eligible to supply services to specified classes of utilities?

The BTA's position is that NBN Co continue to be eligible to supply services to specified classes of utilities. Further, Local Governments should be included as a specified class of utility who can obtain direct supply from NBN Co. Many Local Governments provide non-commercial services for Public Safety purposes including CCTV monitoring, Street Lighting and Traffic Light control connectivity. The ability to obtain direct Layer 1 (dark fibre), Layer 2 and Layer 3 services from NBN Co should be non-restrictive to any Local Government in Australia, for both Public Safety service connectivity and Wide Area Network (WAN) connectivity. This ability will also result in the provision of a foundation connectivity layer for future digital services that will be delivered by Local Government such as Sensor Networks and Machine to Machine (M2M) connectivity.

NBN Co ability to deal with end-users

NBN Co should be able to deal directly with end-users for the purposes of fibre network extension and fibre on demand (which will now be an essential requirement under the NBN Co Multi Technology Mix (MTM) architecture). Further the BTA advocates the ability for NBN Co to provide dark fibre access directly to certain categories of end-users.

Restricting NBN Co to the supply of Layer 2 services

The BTA's position is that there should be no limitation by law imposed on NBN Co to operate at the lowest possible layer of the Open Systems Interconnection (OSI) stack (Layer 2). Appropriate oversight mechanisms by the Australian Government and the ACCC will suffice. The BTA believes this approach retains maximum flexibility as un- envisaged needs arise or innovative requirements dictate NBN Co to provide a higher layer of service delivery in the OSI stack.

Supply of other Goods and Services

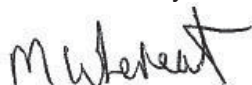
The BTA suggests that any specific restrictions on NBN Co in relation to the supply of good and services should retain maximum flexibility to accommodate future valid requirements which are currently un-envisaged.

Remaining Provisions

The BTA strongly recommends that as part of NBN Co's licence conditions, all 'As Constructed' information in each particular Local Government area is progressively provided to that Local Government in an appropriate Geospatial data format for the internal purposes of Local Government infrastructure management and planning. Whilst the provision of this information is already captured by Dial Before You Dig and can already be accessed by Local Government on a project by project basis, the additional provision of 'As Constructed' information will greatly streamline construction and planning of future Local Government owned infrastructure across Australia. The resultant benefits of a reduction in NBN Co material works (i.e. changes required to NBN Co infrastructure to accommodate new or upgraded Local Government infrastructure) will likely outweigh any additional operational costs to NBN Co in the provision of this information.

Thank you for the opportunity to provide this submission. If the NBN Review Panel wishes to discuss any of these matters further please do not hesitate to contact me.

Yours faithfully



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About the Broadband Today Alliance:

The Broadband Today Alliance (BTA) is a collaborative alliance of local government, RDA and Regional Organisations of Councils' (ROCs) built on the premise of sharing information and advocating for the resources to assist the localised transition to a digital economy. Over 135 local governments are represented with over 8 million Australians represented across all states and Territories.

The BTA is an officer level organisation and, in its current form, has been in existence for over two years and prior to that for a further 2 years as the South East Queensland Broadband and Digital Economy Working Group aligned under the Council of Mayors SEQ. In response to interest from other local governments and regional organisations such as RDA's, the group has grown to become a national organisation with members from all states and territories.