

28 May 2020

To whom it may concern,

I request Telstra's request for extension to Ministerial exemptions for its South Brisbane and Velocity networks be denied. On the 31st of May 2018 Telstra were granted a third extension, pushing their combined extension periods to over 8 years. To date they have not demonstrated any willingness to comply with their obligations to upgrade the network as required by the Telecommunications Act Parts 7 and 8.

I live in the Bluestone Mount Barker (SA) estate, which is serviced by Telstra Velocity. I'm a Software Engineer and regularly required to work from home. I have been living here for 3 years and during this time have contacted Telstra a few times (Dec 2016, Feb 2017, June 2018, March 2019, July 2019, October 2019) to give an indication or commitment to upgrade the network to provide at least the quality of service that NBN does. Every time Telstra's response was there is no plan to upgrade and there is no plan to sell to some one who will.

The Telstra Velocity network is outdated and anti-competitive. The only choice of provider is Telstra or Exetel, a Telstra re-seller product. There are no fixed wireless providers around in my area. So Telstra Velocity via Telstra is my only choice. Currently playing \$110/month for 100Mbps down and 5Mbps up. For the same price from Telstra on NBN you get 40Mbps upload and an IPv6 capable connection. IPv6 will also become increasingly important as IPv4 is phased out.

Other 'adequately served' networks (OptiComm, OPENetworks, LBNCo, RedTrain) a choice of providers for around \$99/month for 100Mbps down 40 Mbps up. Exetel provides this at \$99/month, while their re-sale offering of Telstra Velocity is \$140.99/month. This gives an indication of how anti-competitive Telstra Velocity is.

A quote from the result of the extension from 31 May 2018

https://www.communications.gov.au/file/38051/download?token=seeEdZ_V

If services are not able to be provided by Telstra in South Brisbane in compliance with the Act, or Telstra is unable to sell the network to a provider that can, the Government would expect NBN Co to overbuild or acquire existing networks. Considering protracted unsuccessful negotiations between NBN Co and Telstra for the sale of the South Brisbane Network to NBN Co, overbuild in the area is a real possibility.

In summary:

- Telstra has had 8 years of exemptions already, with 3 extensions
- Telstra has not expressed any interest in selling or improving services
- The network is outdated and lacks competition
- The NBN won't overbuild or acquire without government intervention

In my view Telstra should be forced to take action immediately or be penalised. Else in 3 years time they will request another extension.

Andreas Wulf

Mount Barker SA, 5251