

12th May 2020



Consultation on Draft Statutory Infrastructure Provider Exemption Instrument

The Australian Communications Consumer Action Network (ACCAN) thanks the Department of Communications and the Arts for the opportunity to comment on the draft Statutory Infrastructure Provider (SIP) exemption instrument. ACCAN is Australia's peak communications consumer organisation representing individuals, small businesses and not-for-profit groups as consumers of communications products and services.

ACCAN supports the purpose of the Telecommunications (SIP- exempt real estate development projects and building redevelopment projects) Instrument (No.1). 2020, which exempts carriers providing voice services to real estate development projects and building redevelopment projects from the requirements to meet SIP obligations. Generally, NBN and other carriers providing telecommunications services to new developments will become SIPs regardless of technology. However, the obligations to meet SIP requirements may prevent the provision of voice networks. Thus, the exemptions are important to ensure new developments are able to receive voice services, particularly in areas which are outside of NBN's fixed footprint.

ACCAN considers the exemptions reasonable, as they allow Telstra to continue to meet its obligations as the primary Universal Service Provider and expand its HFC network until the completion of the NBN without obligation to provide high speed broadband. The obligation may deter Telstra from extending HFC networks in new developments which would be harmful to the limited number of consumers this would impact. It also allows the provision of voice services through mobile coverage and radiocommunications networks whilst NBN remains the default SIP and is obliged to provide high speed broadband.

Thank you for considering ACCAN's position on this issue.