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Hi,

If the review is still open please consider our comments as detailed below. These comments are not confidential.

**Section 2.1 para 1**

There have been occasions in the past where it would have been beneficial from a network development viewpoint, if developers of land, which was not for sale or lease, were obliged to comply with Part 20A of the Telecommunications Act 1997 and TIND. We recommend that consideration be given to extend this to cover all developments, so that network continuity is maintained.

**Section 2.2 para 1 and Section 3.2 para 2**

We recommend that Will Part 20A fibre ready requirements be amended to include unincorporated developers, to ensure continuity of telecommunications network development.

**Section 3.2 para 6**

We suggest that a more realistic minimum notice period for a developer to apply to NBN Co would be 10 months, given NBN Co's fibre install, QA, design review and pit and pipe build time frames.

**Section 3.4 para 2**

Telstra's voice infrastructure costs are often prohibitive, since not all developers are complying with the TIND policy and Part 20A. The Dept needs to address this by more carefully reviewing exemptions and including penalties under Part 20A for non-compliance with Part 20A for developers who are non-statutory corporations.

**Section 3.10 para 2**

It's surprising that NBN Co Deployment Charges haven't been increased, given NBN Co published losses and the fact that competitors are charging up to \$900/lot plus backhaul. Competitors would see this as an unfair advantage. These cost structures may not be maintainable, if and when NBN Co is privatised.

**Section 3.12 para 1**

In WA metro areas, developers generally comply with Part 20A and TIND. As noted above the same cannot be said in semi-rural and rural areas.

Kind Regards,

Brian Burton  
Senior Communications Engineer