



TELSTRA CORPORATION LIMITED

Submission to the Department of Infrastructure, Transport, Regional Development and Communications on the proposed update of the Telecommunications in New Developments policy

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01 Introduction

Telstra welcomes the opportunity to comment on the draft Telecommunications in New Developments (TIND) policy. The revised TIND policy is designed to replace the existing policy which took effect in March 2015 (**the 2015 TIND policy**).

The draft TIND policy has been revised to reflect a number of changes in the telecommunications landscape since 2015. These include the impending completion of the National Broadband Network (NBN) and the commencement of the Statutory Infrastructure Provider (SIP) legislation on 1 July 2020, as well as Telstra's substantially reduced role in installing telecommunications infrastructure in new developments compared to the position in 2015.

In light of these changes, a significantly shorter and more targeted (and therefore more accessible) TIND policy is appropriate now. The draft TIND policy goes a long way towards achieving that objective – it is shorter and simpler than the 2015 TIND policy, it largely aligns with the SIP legislation, and it *“seeks to promote sustainable outcomes by minimising government intervention and fostering commercial operation in a competitive context”*.¹

In the remainder of this submission, we provide our comments on the draft TIND policy. Our submission is structured as follows:

- In part 2 of the submission, we set out our comments on section 2 of the draft TIND policy. Our comments cover the following sections of the draft TIND policy:
 - What is a development (section 2.1 of the draft TIND policy);
 - Broadband and voice services on fixed networks (section 2.3 of the draft TIND policy);
 - Carriers and carriage service providers (section 2.5 of the draft TIND policy); and
 - Statutory Infrastructure Providers (SIPs) (section 2.6 of the draft TIND policy).
- In part 3 of the submission, we set out our comments on section 3 of the draft TIND policy. Our comments cover the following sections of the draft TIND policy:
 - Consumer outcomes (section 3.1 of the draft TIND policy);
 - Developer responsibilities (section 3.2 of the draft TIND policy);
 - Exemptions from pit and pipe requirements (section 3.3 of the draft TIND policy);
 - SIPs and infrastructure providers (section 3.4 of the draft TIND policy);
 - Access technology (section 3.5 of the draft TIND policy);
 - Adjacency to NBN Co's long term fixed-line footprint (section 3.6 of the draft TIND policy);
 - Network and service standards (section 3.11 of the draft TIND policy); and
 - Awareness-raising and compliance (section 3.12 of the draft TIND policy).

¹ Draft TIND policy, page 4.



02 Comments on section 2 of the draft TIND policy

2.1. What is a development (section 2.1 of draft TIND policy)

Section 2.1 of the draft TIND policy describes what constitutes a “development” for the purposes of the policy. In particular, section 2.1 notes that:

“New developments may vary in size and scope. A new development could be a single lot with a freestanding residential premises built on it (known as a ‘single-dwelling unit’ or SDU), a single lot with more than one SDU on it, or a new apartment block (known as a ‘multi-dwelling unit’ or MDU).

In brownfield areas, a SDU or MDU may be built on a vacant block, existing premises may be knocked down and new SDUs or MDUs built at the same location (known as a ‘knock-down rebuild’), or an existing building redeveloped or refurbished (e.g. where a warehouse is converted into apartments).

...

Developments by owner-builders such as the construction of a new premises on a vacant block, construction of a new premises on a sub-divided block or a knock-down rebuild project, whether it involves one or more premises, are treated as developments under the policy”²

Telstra believes the policy would benefit from some greater clarity regarding single lots with more than one SDU on the lot, for example, where there is a primary dwelling on a lot and a secondary dwelling (such as a granny flat) is subsequently built on the same lot.

We are aware of instances where secondary dwellings have not been recognised as separate premises and, as a result, they are not served by their own telecommunications infrastructure from the carrier in the area. Situations like this can create difficulties for Telstra as the Universal Service Obligation (USO) provider, because we may need to install our own infrastructure to service the secondary dwelling in these instances, in circumstances where another carrier is the infrastructure provider in the area.

With these considerations in mind, we believe the policy should expressly state that a new SDU built on the same lot as a new or existing SDU is a “development” for the purposes of the TIND policy, and that telecommunications infrastructure should be installed in that new SDU in accordance with the policy.

2.2. Broadband and voice services on fixed networks (section 2.3 of draft TIND policy)

Section 2.3 of the draft TIND policy states that:

“The TIND policy is focussed on the provision of broadband and voice services using fixed infrastructure. This is because the provision of fixed infrastructure is best done as part of the development process, involves more investment and co-ordination and has been historically more challenging. While an increasing amount of telecommunications traffic is now carried by mobile networks, fixed networks still carry the vast majority of internet traffic, for example, streaming videos and large file downloads. Access to voice services over fixed lines is also considered beneficial as a back-up for mobile services and for those consumers not comfortable with mobile technology. The TIND policy does not directly address the provision of mobile services in new developments as these services are typically provided by competing carriers on a commercial basis with minimal government involvement”³

² Draft TIND policy, pages 4 and 5.

³ Draft TIND policy, page 5.



Telstra agrees that the TIND policy must continue to focus on the provision of fixed broadband and voice infrastructure. However, we have some concerns about the way section 2.3 of the draft TIND policy has been framed, including the reference to the provision of voice services over “fixed lines”. In particular, we think that, as currently drafted, section 2.3 may give rise to some confusion by suggesting that the policy:

- is only relevant to the installation of fixed-line infrastructure, rather than applying to fixed networks more broadly; and
- does not cover fixed services which may make use of mobile network technology (e.g. some fixed wireless services).

We acknowledge that other sections of the draft TIND policy refer to the provision of fixed-line, fixed wireless and satellite technologies, particularly when discussing the SIP legislation. However, it may be worth including a reference to each of these fixed technologies in section 2.3 of the draft TIND policy as well, to make it clear from the outset that each of these technology types deliver fixed services to end-user premises and the policy is therefore relevant to them.

2.3. Carriers and carriage service providers (section 2.5 of draft TIND policy)

2.3.1 Installation of passive infrastructure

In section 2.5 of the draft TIND policy, it states that: “*Passive and active infrastructure are generally provided by telecommunications carriers*”.⁴ Telstra’s experience is that carriers do not generally provide pit and pipe infrastructure. Rather, pit and pipe infrastructure is typically installed by a civil contractor working for the developer. The draft TIND policy should be amended to reflect this.

2.3.2 NBN Co’s role as the default infrastructure provider

Section 2.5 of the draft TIND policy goes on to say:

“Developers are free to choose the carrier that services their developments. Most carriers make commercial decisions as to whether to provide infrastructure and services in new developments. However, to ensure services are available, NBN Co is obliged to service new developments with broadband infrastructure upon reasonable request. That is, it is the default infrastructure provider. Fixed line and fixed wireless infrastructure can typically support voice services as well as broadband”.⁵

We think it may be useful to supplement this paragraph by referencing each of NBN Co’s network types – fixed-line, fixed wireless and satellite. This will make it clearer that NBN Co is obliged to service new developments with broadband infrastructure upon reasonable request no matter the network type or footprint into which the development falls, and that NBN Co is therefore the default infrastructure provider within and outside its fixed-line footprint. We think this is an important clarification to make given that, to date, NBN Co’s IPOLR role has effectively been limited to the fixed-line footprint under the 2015 TIND policy.

2.3.3 The provision of voice services outside NBN Co’s fixed-line footprint

Lastly, we note section 2.5 of the draft TIND policy touches on Telstra’s role in installing telecommunications infrastructure. It states:

⁴ Draft TIND policy, page 6.

⁵ Draft TIND policy, page 6.



“Telecommunications infrastructure is commonly used to provide wholesale services which are then used by competing retail service providers to provide services to their customers. Again, most retail service providers make a commercial decision as to where they will provide services. However, Telstra is obliged to provide a voice service upon reasonable request nationally as part of its universal service obligation (USO).

Telstra will generally provide a voice service where required using NBN Co’s infrastructure and wholesale services. Where Telstra does not use NBN Co’s infrastructure, it may need to provide its own infrastructure to supply voice services”⁶.

A key reason why Telstra does not always use NBN Co’s infrastructure to provide voice services is that, outside NBN Co’s fixed-line footprint, NBN Co’s services are not USO-compliant. In our submission to the Department’s initial consultation paper, Telstra argued that NBN Co’s fixed wireless service – which is required to support voice calls – should be made USO-compliant in order to facilitate the delivery of USO voice services outside the fixed-line footprint. In particular, we stated that:

“In our view, NBN Co’s fixed wireless service should be made USO-compliant to facilitate the delivery of USO voice services outside the fixed-line footprint, including by ensuring the relevant Customer Service Guarantee (CSG) requirements can be met. This is the logical next step resulting from the SIP legislation, which will make NBN Co the default SIP and require its “qualifying fixed wireless network” to have voice and broadband capability. Indeed, it would be neither logical nor efficient if NBN Co as the SIP was required to connect premises to a “qualifying fixed wireless network” with voice and broadband capability, but was not required to make that fixed wireless service USO-compliant, potentially requiring Telstra to deploy additional infrastructure to provide USO voice services to the same premises.

If this suggestion were implemented, Telstra would be able to use NBN Co’s fixed-line and fixed wireless technologies to provide USO voice services, so there would be less need for Telstra to effectively duplicate the installation of infrastructure in order to provide these services in the future”⁷.

It may be that these issues are more appropriately considered and addressed as part of ongoing telecommunications reform work, rather than through an update to the TIND policy. However, it may be beneficial (particularly for consumers and developers) to explain in the TIND policy why Telstra is not always able to use NBN Co’s infrastructure to provide voice services.

2.4. Statutory Infrastructure Providers (SIPs) (section 2.6 of draft TIND policy)

Section 2.6 of the draft TIND policy summarises the SIP regime in the following way:

“To ensure all places in Australia have ready access to modern telecommunications the Australian Parliament has before it new statutory infrastructure provider (SIP) legislation. This legislation creates obligations for NBN Co (as the default SIP for Australia) and for other carriers who roll out networks in new developments.

When a developer contracts a carrier to service its development, the carrier will become the SIP for that development. SIPs are required to connect premises in their service areas to their networks on reasonable request from a retail provider, and supply wholesale services that allow end-users to receive high-speed broadband and (on fixed-line and fixed wireless networks) voice services”⁸.

Our comments on this section of the draft TIND policy are set out in 2.4.1 and 2.4.2 below.

⁶ Draft TIND policy, page 6.

⁷ Telstra submission to the Department of Communications and the Arts regarding the review of the 2015 Telecommunications in New Developments Policy, 17 January 2020, page 9.

⁸ Draft TIND policy, page 6.



2.4.1 Details regarding the SIP regime

For similar reasons to those discussed in part 2.3.2 of this submission, we think it would be worthwhile to provide a little more detail regarding the SIP regime and the network types to which it applies. In particular, it would be useful to make it clear that the SIP is required to connect premises to a fixed-line telecommunications network in the first instance or, where that is not reasonable, to a fixed wireless or satellite network. In our view, this will make it clearer that NBN Co, as the default SIP for Australia, is obliged to service new developments with broadband infrastructure upon reasonable request in its fixed-line, fixed wireless and satellite footprints.

It might also be useful to clarify that, when a developer contracts a carrier to service its development, the carrier will become the SIP for that development where the development is a real estate development project or a building redevelopment project under the SIP legislation. This means, for example, that a carrier installing telecommunications infrastructure for an owner-builder may not trigger the SIP nomination obligations as a result of that development (but the carrier may, in fact, be the existing SIP for the area including the owner-builder's lot).

2.4.2 Clarifying the interaction between the SIP regime and the USO

As discussed in our submission to the Department's initial consultation paper, we also think the revised TIND policy should specifically address and clarify the interaction between the SIP regime and the USO.⁹ While other carriers have the choice of whether to deploy infrastructure, and therefore whether to assume the role of SIP, the USO provider must, where necessary, deploy infrastructure which is at least capable of providing the USO voice service. The entry into a contract with a developer to deploy telecommunications infrastructure should not trigger the application of the SIP regime – which would require the provision of superfast broadband infrastructure throughout the development – if the contract with the developer is only to provide a voice capable network or otherwise to meet the USO.

Telstra has been seeking regulatory certainty regarding the Minister's ability to exempt specified real estate development projects and building redevelopment projects from the SIP nomination obligations where the entry into the contract is solely for the deployment of infrastructure to provide USO voice services. Telstra considers that the position reached in relation to these exemptions from the SIP nomination obligations ought to be reflected in the revised TIND policy, even though the exemptions will rely on a legislative instrument to take effect.

If the position reached in relation to these exemptions is not reflected in the revised TIND policy, there is a material risk that consumers, developers, and even other carriers may be confused about Telstra's role in new developments and think that, when Telstra contracts with a developer to install infrastructure to provide USO voice services, Telstra will become the SIP and will also be required to provide superfast broadband infrastructure and wholesale services. The TIND policy should explain that that is not the case, to help minimise possible confusion in this regard.

⁹ Telstra submission to the Department of Communications and the Arts regarding the review of the 2015 Telecommunications in New Developments Policy, 17 January 2020, page 10.



03 Comments on section 3 of the draft TIND policy

3.1. Consumer outcomes (section 3.1 of draft TIND policy)

In section 3.1, the draft TIND policy encourages consumers “*that have particular preferences about the network, and/or the retail service provider they use ... to check which carrier and/or retail service providers are servicing a development before committing to it*”.¹⁰

It would probably be helpful for consumers if the policy suggested some ways for them to find this information, for example, by checking with the developer directly, or by using the mapping information which is required to be provided by SIPs to the Australian Communications and Media Authority.

3.2. Developer responsibilities (section 3.2 of draft TIND policy)

Section 3.2 of the draft TIND policy says: “*Most developers engage a carrier, provide pit and pipe where required, and have a carrier install the network*”.¹¹ We think there is a small risk that this sentence could be construed as saying the carrier (rather than the developer) provides the pit and pipe.

As discussed above in part 2.3.1 of our submission, Telstra’s experience is that carriers do not generally provide pit and pipe infrastructure. Rather, pit and pipe infrastructure is typically installed by a civil contractor working for the developer. To ensure the sentence is not misconstrued, we suggest it be redrafted to say: “*Most developers provide pit and pipe where required, and engage a carrier to install the network*”.

3.3. Exemptions from pit and pipe requirements (section 3.3 of draft TIND policy)

Section 3.3 of the draft TIND policy states:

*“In rural and remote areas incorporated developers may claim an exemption from the pit and pipe infrastructure requirements under Part 20A of the Telecommunications Act. This exemption is specifically targeted at developments where telecommunications would generally be offered by direct buried cable, wireless or satellite service, and do not need pit and pipe infrastructure. Details on claiming an exemption are available from the website of the Department of Infrastructure, Transport, Regional Development and Communications”.*¹²

We think this paragraph should also explain that, before seeking to claim an exemption from the pit and pipe requirements in Part 20A, developers should ensure they engage a carrier to service their new development, so the carrier can indicate whether it requires pit and pipe infrastructure to service that development.

¹⁰ Draft TIND policy, page 7.

¹¹ Draft TIND policy, page 7.

¹² Draft TIND policy, page 8.



3.4. SIPs and infrastructure providers (section 3.4 of draft TIND policy)

Section 3.4 of the draft TIND policy states:

“As noted above, developers are free to approach the carrier of their choice. The carrier a developer contracts to roll out networks in a new development will become the SIP for that development, and that SIP will need to connect premises and supply wholesale services so retail providers can supply broadband and voice to consumers at those premises.

*As also noted above, outside NBN Co’s fixed-line footprint, Telstra may also need to provide infrastructure of its own to provide voice services. Typically a developer would contract Telstra to provide such infrastructure for voice services, and this infrastructure may be additional to infrastructure provided by SIPs for broadband. The basis on which Telstra does this would be a commercial matter for it and the developer”.*¹³

Our comments on this section of the draft TIND policy are set out in 3.4.1 and 3.4.2 below.

3.4.1 Details of the SIP regime

The concept of the SIP is introduced and explained in section 2 of the draft TIND policy, but we think it is worth repeating some of those details in this section, given it is section 3 of the draft TIND policy that contains the elements of the policy itself. In particular, we think it is worth repeating that:

- Under the SIP legislation NBN Co will become the default SIP for all of Australia, and under the revised TIND policy it will be the default infrastructure provider across the country as well. This will be particularly relevant for developers to understand if/where other carriers do not wish to service a new development.
- SIPs are required to connect premises to fixed-line networks in the first instance and, where that is not reasonable, to fixed wireless or satellite technologies (with a cross reference to section 3.5 of the draft TIND policy, which discusses access technologies in more detail).
- The carrier a developer contracts to roll out networks in a new development will become the SIP for that development, where the development is a real estate development project or a building redevelopment project under the SIP legislation.

3.4.2 Telstra’s role as an infrastructure provider in new developments

In relation to Telstra’s role as an infrastructure provider, there may be circumstances where we need to provide our own infrastructure to provide USO voice services outside NBN Co’s fixed-line footprint, and we currently offer contracts to developers outside the fixed-line footprint in accordance with the 2015 TIND policy, although these are not always accepted by the developer.

We would make several suggested amendments to the description of Telstra’s role to reflect this, and also to make it clear that Telstra will not be the SIP where it contracts with a developer to install telecommunications infrastructure to provide voice services in fulfillment of the USO (discussed in part 2.4.2 of our submission (above)). We suggest the second paragraph of section 3.4 of the draft TIND policy be amended to read:

¹³ Draft TIND policy, page 8.



“As also noted above, outside NBN Co’s fixed-line footprint, Telstra may also need to provide infrastructure of its own to provide voice services. Telstra may contract with a developer to provide such infrastructure for voice services, and this infrastructure may be additional to infrastructure provided by SIPs for broadband. The basis on which Telstra does this would be a commercial matter for it and the developer. Telstra will not become the SIP where it contracts with a developer to install telecommunications infrastructure in these circumstances.”

3.5. Access technology (section 3.5 of draft TIND policy)

Section 3.5 of the draft TIND policy states:

“So they can meet their ongoing SIP requirements, carriers should install fixed-line networks in new developments unless this is not reasonable, in which case they should use either fixed wireless or satellite technologies.

Consistent with their ongoing SIP requirements, the technology platform must enable the carrier to supply wholesale services to retail providers that will then allow those retail providers to supply broadband services to end-users with peak download speeds of at least 25 Mbps and peak upload speeds of at least 5 Mbps.

On fixed-line and fixed wireless networks, including NBN Co’s, the wholesale services should also allow retail providers to supply end-users with voice services. Measures that prevent them being used in this way will be scrutinised and subject to appropriate action.

*Carriers remain free to install networks that offer both higher and lower speeds as well as these specified speeds”.*¹⁴

We think this section of the draft TIND policy needs some clarification.

First, we think it should be made clear that, when Telstra installs telecommunications infrastructure in new developments in order to provide USO voice services, it may use a range of possible access technologies including copper, fixed wireless and satellite. As discussed above, Telstra has sought regulatory certainty that it will not be the SIP when it installs telecommunications infrastructure under contract with a developer to provide USO voice services and, as a result, Telstra will not be required to meet the SIP requirements regarding access technology either.

Second, we note that the SIP legislation will require fixed-line and fixed wireless networks to support voice services as well as superfast broadband services. We think paragraph 3 (quoted above) should make it clear that the provision of voice services over fixed-line and fixed wireless networks is a requirement under the SIP legislation, rather than something which a SIP’s wholesale service “should” allow.

Lastly, we note that the SIP legislation defines superfast broadband as a carriage service where “*the peak download transmission speed of the carriage service is at least 25 megabits per second” and “the peak upload transmission speed of the carriage service is at least 5 megabits per second” (emphasis added). By contrast, the fourth paragraph in section 3.5 of the draft TIND policy (quoted above) suggests that, where a carrier is the SIP, it must offer a 25/5 Mbps service, as well as being able to offer higher and lower speeds. We think this sentence needs to be amended to make it clear that 25/5 Mbps are minimum peak transmission speeds, so the SIP can offer those speeds or higher to meet the SIP requirements and that, in addition, SIPs are also free to offer lower speeds to cater for end-users who do not require superfast broadband.*

¹⁴ Draft TIND policy, page 8.



3.6. Adjacency to NBN Co's long term fixed-line footprint (section 3.6 of draft TIND policy)

Like the 2015 TIND policy, the draft TIND policy states that, when servicing a new development outside but adjacent to its long-term fixed-line footprint, NBN Co "should consider" using fixed-line technology.

As discussed in our submission to the Department's initial consultation paper, Telstra's experience is that NBN Co rarely services adjacent developments using fixed-line infrastructure.¹⁵ While this may have been understandable in the past (when NBN Co's focus was on completing its brownfield rollout), we suggested in our previous submission that, moving forward, a general requirement to provide fixed-line infrastructure in adjacent developments would lead to better outcomes for consumers and developers who are close to the fixed-line footprint, by allowing them to achieve comparable outcomes to their neighbours.

Short of imposing a general requirement on NBN Co to install fixed-line infrastructure in adjacent developments, we support the proposal in the draft TIND policy to require NBN Co to keep records where it decides not to use fixed-line infrastructure, including its reasons, and to make those records available to the Minister on request.

3.7. Network and service standards (section 3.11 of draft TIND policy)

Under the SIP regime, the Minister will be able to set standards, rules and benchmarks that SIPs must comply with (or in the case of benchmarks, meet or exceed). According to the Explanatory Memorandum accompanying the SIP Bill, the matters that could be specified in standards, rules and benchmarks are broad. For example, standards could include timeframes for connecting premises and rectifying faults, and rules could be made about how premises must be connected and how complaints must be addressed. Benchmarks could be set in relation to a matter covered by a standard.

Section 3.11 of the draft TIND policy confirms previous indications by Government that it intends to set standards and associated benchmarks applying to SIPs, including providers in new developments. The draft TIND policy states that these will "*provide maximum timeframes for connection and repair of wholesale services, and set out associated appointment keeping arrangements. Further network performance and reliability standards may also be considered over time if warranted by market outcomes*".¹⁶

Telstra agrees that any Ministerial standards and benchmarks made under the SIP regime should focus on service standards including connection and assurance issues. As discussed in our submission to the Department's initial consultation paper, we also note that it will be important to ensure any standards and benchmarks set as part of the SIP regime take account of, and are consistent with, ongoing work in this area, including the Department's Consumer Safeguards Review Part B and the ACCC's NBN Wholesale Service Standards Inquiry. This ongoing work demonstrates the importance of aligning the incentives operating on wholesalers and retailers, to meet the needs of end-users.¹⁷

¹⁵ Telstra submission to the Department of Communications and the Arts regarding the review of the 2015 Telecommunications in New Developments Policy, 17 January 2020, page 11.

¹⁶ Draft TIND policy, page 11.

¹⁷ Telstra submission to the Department of Communications and the Arts regarding the review of the 2015 Telecommunications in New Developments Policy, 17 January 2020, page 18.



3.8. Awareness-raising and compliance (section 3.12 of draft TIND policy)

Section 3.12 of the draft TIND policy states that:

*“The Government will continue to work with relevant parties, including firms and associations in the development and telecommunications sectors, consumer groups and state, territory and local governments, to maintain and raise awareness among all developers of the need to install appropriate telecommunications infrastructure in new developments. As most developers turn to local planning laws for guidance in the first instance, the Government see ongoing merit in complementary state, territory and local government rules on telecommunications in new developments”.*¹⁸

Telstra’s experience is that, while most developers are compliant, some developers do not provide telecommunications infrastructure in their new developments. There are a variety of reasons for this, including smaller scale developers who are not aware of the requirements of the TIND policy, and/or are not aware of or bound by Part 20A of the *Telecommunications Act 1997* (Cth).

Accordingly, we agree with the Department that ongoing work is needed to help ensure all developers arrange for the provision of telecommunications infrastructure in their new developments. This may include further awareness raising of relevant policy and legislative requirements, as well as helping to ensure the adoption, maintenance and enforcement of complementary planning measures in all States and Territories requiring developers to make arrangements for the provision of suitable telecommunications infrastructure to the satisfaction of local government or relevant planning authorities.

To the extent the updated TIND policy differs from the 2015 TIND policy, the Department’s awareness-raising will need to address key policy changes to ensure all relevant parties understand and operate in accordance with the new policy. This includes highlighting NBN Co’s role as the default SIP for Australia under the SIP legislation, and the default infrastructure provider under the TIND policy. In relation to Telstra’s ongoing role, it will be important to explain the position in relation to the SIP exemption where Telstra contracts with a developer to install telecommunications infrastructure for USO voice purposes, and also that Telstra may use a range of possible technologies to provide USO voice services.

Lastly, the Department’s awareness raising should clarify that the new SIP regime does not alter the general obligation on developers under Part 20A to install fibre-ready facilities, and that any developer seeking to claim an exemption from Part 20A for a development outside NBN Co’s fixed-line footprint should first engage with the carrier servicing the development to determine whether the carrier in fact requires pit and pipe infrastructure to service the development.

¹⁸ Draft TIND policy, page 11.