

24 January 2020

New Developments Team

Department of Communications and the Arts

Dear New Developments Team,

RE: Network and Service Standards in the Telecommunications and New Developments Policy review

Thank you for providing the opportunity to comment on the review of the *Telecommunications in New Developments policy* (TIND). We support the Government's view that it is good policy practice to review such instruments on an ongoing basis, as noted in the consultation paper.

Communications Alliance members will have a range of perspectives on the TIND, and many will have provided individual submissions. In light of that, we typically would not offer input on this policy. However, the identification of "Network and service standards" as a key issue in the consultation paper is an issue on which we would like to offer some commentary.

The consultation paper raises consumer expectations, and appears to open the possibility of considering retail level service standards in this process. As the Department would be aware, there are three major changes currently underway that may have impact on retail level service standards – the pending status of the Statutory Infrastructure Provider (SIP) legislation, the ongoing development of the Universal Service Guarantee (USG), and the active Consumer Safeguards Review (CSR) which is examining a range of safeguards, expectations, and interrelated regulations and legislation.

The complexity of current legislation and requirements has presented challenges to industry, not the least of which is due to the need for significant time and resources to understand the relationships between the various interconnected and/or overlapping instruments. This has been partially created by the creation of instruments to address specific problems without updating underlying legislation or sunseting regulations that are no longer relevant. Industry has advocated for the Consumer Safeguards Review to resolve these historical issues and create a clear path going forward. We are pleased that the Review is in process, but also aware that there is a significant amount of work still to be done.

We strongly encourage the Department to consider any changes to network and service standard aspects of the TIND in light of those activities, and depending on the outcome of the various moving pieces, plan to re-evaluate any relevant aspects of the TIND in the future to ensure there is no misalignment.

Thank you for your consideration, and please contact Jessica Curtis at J.Curtis@commsalliance.com.au or 02 9959 9116 for any questions.

Yours sincerely,



John Stanton
Chief Executive Officer