



## **Response to Communications Alliance on the NBN Reference Architecture**

NBN Co would like to acknowledge the work being undertaken by Communications Alliance on the NBN Reference Architecture. Active and continued engagement by the industry via the respective forums is drawing out key issues and identifying important requirements, and is therefore of great value to both NBN Co and the Australian industry.

NBN Co would like to support the work of Communications Alliance with the following comments regarding the Reference Architecture.

1. Consistent with NBN Co's mandate and the early stage of its overall design and implementation, NBN Co is currently focussed on delivering a layer-2 fibre wholesale solution, concentrating on interfaces 3, 3a and 3b for the fibre network for the time being.
2. NBN Co also notes and endorses the Communication Alliance approach of focusing upon the end to end architecture rather than upon delineating the roles of specific organisations that will deliver different components of end to end NBN wholesale services. NBN Co is currently following a design philosophy focusing upon that part of the end to end wholesale network delimited by reference points 3 and 3a/b. NBN Co acknowledges the school of thought that suggests further clarification of the 3b interface location/hierarchy is required. In adopting the 3a/3b hierarchy, there is an unwritten implication that the NBN will be a strictly two layer hierarchy based upon local fibre exchanges and centralised aggregation points. We wish to note that there may be situations where the NBN Co will hand-off traffic at an intermediate point between the nominal 3a and 3b interfaces. In these cases, the remainder of the Aggregation & Backhaul will be completed by the receiving Service Provider (Wholesale, Retail, ASP etc). It could be said that this "intermediate-stage" Aggregation & Backhaul is implied by the 3b interface, but in our opinion it is not sufficiently clear. NBN Co is of the view that explicitly noting this "intermediate-stage" will assist with the development of the Wholesale Service Definition.
3. At this time, NBN Co does not have any additional comments on other aspects of the Reference Architecture (e.g. on wireless and satellite and their interrelationship with fixed wholesale services). As Communications Alliance work continues, NBN Co looks forward to contributing further comments to assist.