

20<sup>th</sup> June 2011

Stephanie Mikac  
Inquiry Secretary  
Joint Committee on the National Broadband Network  
PO Box 6021  
Parliament House  
Canberra ACT 2600

Dear Stephanie

**Re: Fibre Deployment Bill**

Thank you for the opportunity to clarify the question on notice arising from our appearance at the Joint Parliamentary Committee on the National Broadband Network that is inquiring into the Telecommunications Legislation Amendment (Fibre Deployment) Bill 2011.

OptiComm supports, in principal, the amendment to the Fibre Deployment Bill proposed by Malcolm Turnbull MP on Friday 17th June. OptiComm's core business is focussed on the design, construction, operation, maintenance and ownership of FTTP networks in greenfield estates and as such, building networks to the NBN Co's design, operating this network for a period of time and transferring the ownership to NBN Co is within our capabilities however not necessarily our preferred business model.

As stated in our submission to the committee, OptiComm is looking for four key changes that should be built into the legislation, namely:

1. Developers should fund the first \$1,000.00 of the construction of the FTTP network from the Telecommunications Carrier of their choice rather than just the construction of the pit and pipe. The selected FTTP provider would be required to design, build, operate, maintain and own the network including pit and pipe.
2. Standards or Code of Practice for the construction of "fibre ready infrastructure" should be to industry standards set by the Communications Alliance and under the Guidelines of the Telecommunications Carrier the Developer has selected to deploy a wholesale only, open access, Layer 2 FTTP network.

3. Backhaul should be available to ALL Telecommunications Carriers constructing wholesale only, open access, Layer 2 FTTP network in greenfield estates or MDU at an equitable basis. This can be achieved by NBN Co constructing the backhaul for all estates or MDU's and providing it at a "declared" monthly access fee or the availability of soft funding for Carriers to finance the construction of the backhaul links themselves.
4. Equitability in the per lot cost to build the passive and active components of the FTTP network in new estates by making available to all qualified wholesale only, open access FTTP providers soft loans that would be repaid over an extended time, say 10 years.

Please do not hesitate to contact myself or Paul Cross if you or the Committee has any further questions.

For and behalf of  
OptiComm Co Pty Ltd



Phil Smith  
General Manager, Carrier Relations and Regulatory