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To: The ACCC

By email: superfastbroadbandinquiry@accg.gov.au

Thank you for the opportunity to express the Internet Association of Australia (IAA) perspective on the *Superfast broadband access service (SBAS) – access determination inquiry Discussion Paper*. Many of IAA's members are small to medium sized internet service providers (ISPs) who are also NBN retail service providers (RSPs). IAA's submission will focus on Questions 3 and 11.

Should the Regional Broadband Scheme (RBS) levy continue to be able to be passed through to RSPs and users or absorbed by SBAS providers?

IAA advocates the RBS levy should be absorbed by SBAS providers instead of being passed through to RSPs and users. In its current form, the levy poses an additional cost to RSPs, when it is in-fact network providers themselves who build and operate the networks.

Should SBAS and FAB service network providers be required to disclose key network service quality and reliability indicators to current or potential RSPs? If so, which indicators would promote competition and improve quality and reliability of service outcomes for RSPs and end users?

SBAS and FAB service network providers should be required to disclose key network service quality and reliability indicators to RSPs. Our RSP members have expressed concerns regarding customer expectations of performance, especially in a CVC model where 1000Mbps service is bundled with as little as 5Mbps of CVC. Customers often expect to see 1000Mbps continuously, and may complain that RSPs are at-fault in this case. Increasing transparency around performance and reliability indicators can help alleviate such misunderstandings.

Network service quality indicators could include time taken to activate (turn up) a connection, actual throughput, latency and network availability. It is IAA's view that where a network provider is providing a replacement NBN equivalent service, then the same reporting obligations should apply as with NBN Co.

Exemptions – Smaller network providers and competition-based exemptions

IAA agrees exemptions to the SBAS determination are necessary to promote competition and encourage new entrants within the infrastructure provider space. However, we would point out that poor quality and services stemming from infrastructure issues affects RSPs negatively, and translates into poorer customer experience especially where customers expect faster levels of broadband.

Once again, I would like to thank you for providing us with the opportunity to contribute to *SBAS Access Determination Inquiry Discussion Paper*.

About the Internet Association of Australia

The Internet Association of Australia (IAA) is a member-based association representing the Internet community. Founded in 1995, as the Western Australian Internet Association (WAIA), the Association changed its name in early 2016 to better reflect our national membership and growth.

Our members comprise industry professionals, corporations and affiliate organisations. IAA provides a range of services and resources for members and supports the development of the Internet industry both within Australia and internationally. Providing technical services as well as social and professional development events, IAA aims to provide services and resources that our members need.

IX-Australia is a service provided by the Internet Association of Australia to Corporate and Affiliate members. It is the longest running and lowest cost Internet Exchange in Australia. Spanning six states and territories, IAA operates over 30 points of presence and operates the New Zealand Internet Exchange on behalf of NZIX Inc in New Zealand.

IAA is also a licenced telecommunications carrier, and operates on a not-for-profit basis.

Yours faithfully,

Narelle Clark
Chief Executive Officer
Internet Association of Australia