



INTERNET ASSOCIATION OF AUSTRALIA
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Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

By email: mergers@accc.gov.au

RE: Telstra and TPG application for merger in regional Australia

Thank you for the opportunity to express the Internet Association of Australia's (IAA) perspective on the application for merger authorisation from Telstra Corporations Limited (Telstra) and TPG Telecom Limited (TPG).

Many of IAA's members are small to medium sized Internet Service Providers (ISPs) who are also NBN Retail Service Providers (RSPs). Our response is primarily to represent the perspective of our members, and for the public good of the internet more generally.

In general, we support the principle that open access provided at a fair cost is beneficial for the overall market. However, we also note that this agreement raises the risk of potentially entrenching dominant players in the industry, thereby hindering competition. As such, we believe that any infrastructure built with public money should be open to all relevant and qualified telecommunications providers to access.

Once again, IAA appreciates the opportunity to contribute to the application for merger authorisation from Telstra Corporations Limited (Telstra) and TPG Telecom Limited (TPG). We acknowledge and support the work of the Commission in ensuring the merger authorisation will be of public benefit and will not obfuscate competition in the industry.

ABOUT THE INTERNET ASSOCIATION OF AUSTRALIA

The Internet Association of Australia Ltd (IAA) is a member-based association representing the Internet community. Founded in 1995, as the Western Australian Internet Association (WAIA), the Association has grown to over 400 members comprising industry professionals, internet content and service providers.

IX-Australia is a service provided by the Internet Association of Australia to corporate members. With over 30 points of presence around Australia, it is a highly populated, rich source of content and the longest running, most efficient network of Internet Exchanges in Australia. The Association also operates NZIX, New Zealand's strongest Internet Exchange service.

IAA provides a range of services and resources for members, and supports the development of the Internet industry both within Australia and internationally through the provision of technical, social and professional development events. IAA is also a licenced telecommunications carrier, and operates on a not-for-profit basis.

For more information about the Internet Association of Australia see www.internet.asn.au or the New Zealand Internet Exchange see www.ix.nz

Yours faithfully,

Narelle Clark
Chief Executive Officer
Internet Association of Australia