



Consultation question answers to Specified point of interconnection:

- 1) Vital understands some LFC's specify multiple POI's per area, however they are considered to be equivalent – i.e. services can be picked up from any of the local POI's without differing commercial impact to the RSP. Vital supports this, including the *addition* of more POI's if they are provided under equivalence (i.e. there is no withdrawal of POI's, and new POI's are offered with the intent of increasing “equivalent” handover locations within the same area which any RSP may choose to consume from).

We believe this approach will allow flexibility for the LFC's to add handover locations as appropriate throughout serving areas, while maintaining equivalence. The intent being that from “any handover” within the prescribed Specified Fibre Area's where all services are consumable without incurring any additional costs or commercial construct to the RSP's, based on the POI.

- 2) With reference to point 29. of the Specified points of interconnect: Yes, Vital believes the intent of this specification pertains to Layer-2 services only.

Should Layer-1 services were to be brought into consideration for this specification of POI's, it is Vital's view that every LFC CO's must also be added into the specified POI list.

Vital also strongly believe that each POI should have regulated Co-location arrangements.

- 3) Have not checked in detail, however Vital believes more POI's have been added to the original list and that the LFC POI's list appears to be correct.
- 4) Agree, that specification for a POI / Geographic region is the most sensible approach. A comprehensive list of end-user premises seems to be a wholly unwieldy method of specification, as this is likely to have a constant need for amendment/ administration without producing any perceivable benefit.
- 5) Vital understands there are services currently provided by some LFC's (predominately Chorus) which maybe legacy and/or non-regulated services. For example, Bandwidth Fibre services or Regional Transport Services. Vital does not believe the intent is for these to be captured by this specification, as generally there is not an aggregate POI/Handover (as they are point-to-point in nature).
- 6) No.
- 7) It would be ideal if additional areas were incorporated back into the existing POI where practicable. This would be a much more pragmatic approach for RSP's and is the most likely approach to engender the best outcomes for consumers.



- 8) Any other alternative POI for the area, should be listed if there is one available.
- 9) We are not clear if the current list of handover points are adequately documented within the existing UFB2/RBI/RCG information as it relates to this particular initiative, however a list of POI's for both UFB2 and RBI (and their respective coverage areas) would be hugely helpful, and enable the industry to respond to consumer demand more effectively.