

# ISPANZ Submission on

## Fibre fixed line access service deregulation review under section 210 of the Telecommunications Act

### Reasonable grounds assessment draft decision

#### Introduction

You have asked for submissions on your draft decision that no reasonable grounds exist to start a deregulation review for Voice services, Bitstream PON services, Unbundled PON services, Point-to-point services, Transport services, Co-location and interconnected services, and Connection services.

Thank you for the opportunity to comment. ISPANZ agrees with your draft decision as summarised in Table 3.1 of your draft decision document.

#### Comment

ISPANZ members are all retail service providers (as described in clause 2.45 of your draft decision document) who rely on there being efficient and cost-effective FFLAS providers. In order to provide competitive, high quality and reasonably priced connectivity to end customers, our members rely on the purpose detailed in s162 of the Telecommunications Act being put into effect.

We agree strongly that regulated fibre service providers must:

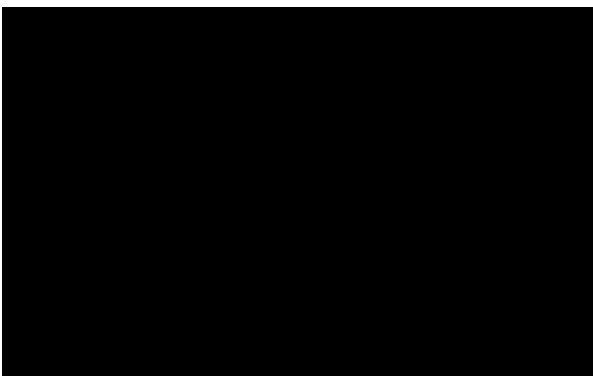
- have incentives to innovate and to invest, including in replacement, upgraded, and new assets; and

- have incentives to improve efficiency and supply fibre fixed line access services of a quality that reflects end-user demands; and
- allow end-users to share the benefits of efficiency gains in the supply of fibre fixed line access services, including through lower prices; and
- are limited in their ability to extract excessive profits

Our view is that the current regulatory regime helps deliver on these outcomes and that any deregulation would be detrimental to the quality and cost of end-users' connectivity. We would strongly oppose any proposals to reduce or remove the regulation of FFLAS.

ISPANZ therefore agrees with your draft decision as summarised in Table 3.1 of your draft decision document.

Thank you for the opportunity to comment on your draft decision.



ISPANZ Chief Executive

24<sup>th</sup> September 2024