Dear Reviewers

In considering NBNCo's role in servicing greenfield developments, I encourage you to consider two measures:

1. If NBNCo were to develop a "service aggregation product", many of the issues of competition and consumer choice would be eased. By this I mean integrating third-party network infrastructure into the NBN fabric by defining an interface through which third parties could present their connections to NBNCo for aggregation with NBNCo's own connections and presentation to the RSPs. It would be reasonable for NBNCo to charge an aggregation fee for hosting such a service. Whilst this would be significantly less than the full wholesale fees it generates for its own connections, NBNCo would also be spared the capital costs of building the infrastructure and the ongoing operational costs of maintaining it. For customers, it would ensure availability of the full range of RSPs accessible through the NBN POP, and for the taxpayer it would mean a reduced NBNCo funding burden. For awareness, I previously floated this approach with Ministers Turnbull and Fletcher in 2014 as an option not only for working cooperatively with third party FTTP infrastructure owner/operators in the greenfields space, but also for integrating connections from operators such as TransACT, the many wireless networks that can support a better-than-satellite service - and potentially mobile network operators in regional Australia. Recommendation 7 of the 2015 RTIRC report also alludes to this approach.

2. With the proliferation of NBNCo infrastructure across Australia, it would be timely to lower the 100-premise threshold above which FTTP is a mandatory requirement.

I would appreciate your acknowledgement of this email - and naturally I am happy to elaborate on these ideas if they are of interest.

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Regards ... Robin Eckermann AM FIEAust
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