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NBN Services in Operation – Record Keeping Rules Consultation Paper

ACCAN thanks the ACCC for the opportunity to contribute to its consultation on the proposed extension of the National Broadband Network Services in Operation (SIO) Record Keeping Rules (RKR). ACCAN frequently utilises the quarterly NBN Wholesale Market Indicators Report to assist in our understanding of the NBN market, and ultimately inform our policy positions.

The NBN SIO RKR is due to expire on 30th September 2020 and the Disclosure Direction will expire unless the NBN SIO RKR is extended. Due to the usefulness of the information provided, ACCAN supports the ACCC's preference for extending the RKR for a period of five years. As this will contribute to greater certainty in the regulatory framework, we see no reason why the extension should be less than five years.

Additionally, ACCAN believes the ACCC should keep the current NBN SIO RKR in its current form and has no further suggestions for revision.

If you have any questions, please do not hesitate to contact me.

Yours sincerely,

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