

Submission

10 September 2024

Debbie Graf, Assistant Director
Mobiles, Transmission and Consumer Branch
Australian Competition and Consumer Commission

Re: Domestic Transmission Capacity Service – Final Access Determination Inquiry – Discussion Paper

Dear Ms Graf,

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Australian Competition and Consumer Commission (**ACCC**) for the opportunity to comment on the Domestic Transmission Capacity Service (**DTCS**) Final Access Determination (**FAD**) discussion paper.

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

The economic regulation of DTCS is critical to supporting the delivery of telecommunications services across Australia, and ACCAN welcomes the opportunity to provide comment on the proposed FAD. In light of the market developments the discussion paper details, ACCAN considers:

- DTCS services should be priced by reference to a benchmarking approach as the cost and complexity associated with cost model-based methodologies are likely to outweigh the benefits of additional precision of these pricing approaches.
- The pricing factors for the subsea component of DTCS services to Tasmania should be reviewed to ensure that these factors are relevant and remain cost reflective.
- DTCS services to Christmas Island should be benchmarked against domestic and international prices for transmission services provided over subsea cables.
- The range of capacities covered by the DTCS FAD should be determined by reference to contemporary commercial products.
- The regulated price for non-recurrent charges should be benchmarked against current commercial prices.

ACCAN supports the duration of the DTCS FAD proposed by the ACCC, expiring 31 March 2029.

We thank the ACCC for the opportunity to comment on the DTCS FAD. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at gareth.downing@accan.org.au.

Yours sincerely,

Dr Gareth Downing
Deputy Chief Executive Officer

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP](#)
