COMMUNICATIONS ALLIANCE LTD

NATIONAL BROADBAND NETWORK
FIBRE-TO-THE-PREMISES IN GREENFIELD ESTATES

RESPONSE TO GOVERNMENT CONSULTATION PAPER

12 JUNE 2009

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1 COMMUNICATIONS ALLIANCE

Communications Alliance welcomes the opportunity to respond to the Australian Government's consultation paper on "National Broadband Network : Fibre-to-the-Premises in Greenfield Estates" released in May 2009.

Communications Alliance is the peak telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including service providers, vendors, consultants and suppliers as well as business and consumer groups.

Our vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behavior through industry self-governance.

Communications Alliance believes it is in the best interests of all participants, customers and government that the industry takes responsibility for devising practical, self-imposed solutions that are developed by co-operative processes.

In doing so, Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

2 EXECUTIVE SUMMARY

Communications Alliance supports the policy announced by the Australian Government for Fibre to the Premises (FTTP) to be deployed in Greenfield estate developments receiving planning approval from 1 July 2010. This policy will encourage the provision of high speed broadband services through the nation and will be complementary to the announced establishment of a National Broadband Network (NBN) company to rollout fibre, wireless and/or satellite broadband access to all Australians.

Our key recommendations to the Australian Government in respect of developing and implementing this policy are as follows :

1. **National Approach**

   It is important that a national approach is taken to the regime regulating FTTP Greenfield deployments. This stems from the fact that the telecommunications market is national in character with the majority of service providers operating across multiple state and/or territories. While state and local government factors will need to be considered, it is important that service providers have a consistent framework to operate in rather than different regimes in different states and/or territories.

2. **Formation of a Stakeholder Group**

   The Australian Government should form a stakeholder group involving state/territory and local governments, customer groups, developers, contractors and carriers / service providers at the earliest possible time. Communications Alliance is well positioned with the work it is undertaking on the NBN in general and NBN Early Stage Deployments in particular to represent the telecommunications industry within this stakeholder group.

3. **Definition of FTTP**

   The definition of FTTP for the purpose of mandating Greenfield deployments should be focused on the desired outcomes rather than the technology used. At this early stage there are different technologies available that meet the requirements of achieving 100Mbps data rates and no one technology should form the basis of the definition. An outcome focused definition will allow technology enhancements to be deployed and upgrades to be made without revisiting definitions again at an early stage.

   However, in order to facilitate a consistent national approach for the provision of broadband services, Communications Alliance will be working on an NBN Reference Model and the Wholesale Services for the new National Broadband Network, and if appropriate the Wholesale Services that should apply to FTTP Greenfield deployments (see next section for more details).

4. **Competition and Retail Service Obligations**

   The questions regarding competition and retail service obligations should be considered as part of the Australian Government's regulatory review for 21st century broadband which is currently underway. There should be consistency across FTTP Greenfield, the NBN and any transition arrangements and a holistic approach is important to ensure uniform outcomes across these different areas.

3   TACKLING THE NBN QUESTIONS

3.1   Communications Alliance is Leading Industry NBN Considerations

Communications Alliance has taken the initiative after the Australian Government's announcement of its NBN policy in early April 2009 to co-ordinate and facilitate the telecommunications industry's response and preparation for the NBN.
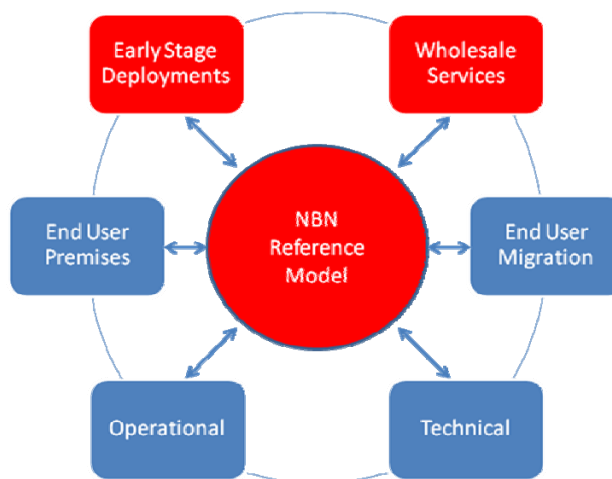
A discussion paper was released in mid-May 2009 that scoped the initial questions and issues of an "Open-Access Wholesale Service Model" for the NBN as proposed by the Australian Government's in its announced policy[1].

Two industry forums were then held in Sydney and Melbourne on the 19th and 20th May 2009 respectively. The importance of the NBN to industry was evident with approximately 150 representatives from a wide cross-section of the Australian telecommunications industry attending the forums. A healthy discussion of the questions and issues demonstrated an eagerness to commence work as early as possible on scoping, planning and designing how industry can implement the NBN policy as effectively and efficiently as possible.

A second discussion paper was released in early June 2009 proposing a way forward for industry to tackle the NBN questions that were discussed and debated at the initial forums[2].

Seven work areas have been identified to address the issues raised by the NBN, namely

- NBN Reference Model
- Wholesale Service
- Early Stage Deployments
- End User Migration
- End User Premises
- Operational
- Technical

The first three areas, shown in red in the diagram, are considered to be the high priority areas for initial focus by industry.

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[1] See NBN Industry Connection Discussion Paper No. 1 – "How can we develop an Open-Access Wholesale Service Model for the NBN?" available at www.commsallliance.com.au

[2] See NBN Industry Connection Discussion Paper No. 2 – "Tackling the NBN Questions – Proposed Way Forward for Industy" available at www.commsalliance.com.au

One of these urgent areas is the Early Stage Deployments work area which will have a focus on FTTP deployments taking place in Tasmania and in Greenfields estates.

Industry experts with experience in these deployments will be involved in discussing, sharing and debating concepts and proposals for how best to manage these early stage deployments and also to ensure that the key learnings can be distributed throughout the industry and with key stakeholders such as local government, developers, network builders and suppliers.

Expertise from other work areas can be drawn on to clarify and discuss key technical, operational, service related and end user premise related issues that arise in the Early Stage Deployments work group.

The detailed work undertaken in the Early Stage Deployments work group will be of significant benefit to the development and implementation of the Australian Government's policy on FTTP Greenfield estates discussed in the consultation paper.

3.2 FTTN Greenfields Stakeholder Group

The FTTP Greenfields consultation paper refers, in the section on "Next Steps", to the formation of a stakeholder group to discuss and co-ordinate the activities related to development and implementation of the announced FTTP Greenfields policy.

Communications Alliance strongly supports such an approach and is prepared to represent the telecommunications industry on such a stakeholder group. Communications Alliance will be able to bring the outcomes and learnings from its Early Stage Deployments work group to this stakeholder group and also bring questions and issues back to the Early Stage Deployments work group for clarification and analysis.

Our answers to many of the questions in the consultation paper refer to the necessary formation of the stakeholder group and also the output from the NBN Early Stage Deployments work group.

It is our view that a process of open and interactive consultation between the various stakeholders will be the best way to address the question and issues that must be resolved to implement the Australian Government's policy. This is especially important given the objective of mandating FTTP Greenfields deployments for those receiving planning approval from 1 July 2010.

4 DELIVERING FTTP TECHNOLOGY IN GREENFIELD DEVELOPMENTS

4.1 Role of Government

Communications Alliance agrees that a national approach should be adopted for the deployment of FTTP technology in Greenfield estates. This is important to ensure customers, service providers and other stakeholders can rely on a consistent framework across the telecommunications market.

The importance of a national approach cannot be understated. This requirement stems from the fact that the Australian telecommunications market is essentially a national market. Suppliers of telecommunications services are predominantly involved in supplying services in multiple states and/or territories. Where there are differences in the supply of telecommunications services these are usually delineated along metropolitan, regional and rural geographic lines or along residential, business and corporate customer lines.

Customers also expect services to be consistent across the various state and territories and consistent across different geographic regions[3]. This facilitates the ubiquitous use of different applications such as telephony, internet and data networking in general. Investments by business customers in their own equipment and systems are more effective if they are uniform and transportable to different locations.

In legislating to mandate FTTP deployments in new Greenfield estates receiving planning approval from 1 July 2010 the Australian Government should ensure that there are no distortions or differences in the application of this mandate in different locations across the country. As a result some form of federal legislation will be important to ensure consistency and uniform outcomes that do not distort the national character of the telecommunications market.

However, as discussed in the consultation paper, state / territory and local governments play an important role in the planning and approval of Greenfield real estate developments. As a result they are important stakeholders in the implementation of the FTTP Greenfields policy. These stakeholders will also be best placed to consider and cater for local factors that will inevitably arise in the roll-out of FTTP networks.

As a result of the above Communications Alliance believe it may be necessary to consider a hybrid of models 1 and 2 in order to implement the policy. Federal legislation and regulations will be required to ensure that the broad policy objectives of delivering fibre based telecommunications services are achieved[4] while state/territory and local authorities will have a role in the actual implementation issues that are normally considered at the state / territory / local level. The Federal Government should however still be involved across all areas to ensure a national approach. Communications Alliance can facilitate the

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[3] Differences in services across metropolitan, regional and rural geographies are supply issues rather than demand issues.

[4] These are discussed in more detail in the remainder of the response provided by Communications Alliance.

development of national standards and specifications that need to apply across all topics.

Figure 4-1 below seeks to show how the legislation and regulations could be split between the Federal, state/territory and local governments :

Topic	Government responsibility
Trenching	Federal / State / Territory / Local Government
Pit and Pipe Infrastructure	Federal / State / Territory / Local Government
FTTP Physical Infrastructure (ie. cabinets, buildings, building access etc)	Federal / State / Territory / Local Government
FTTP Infrastructure Deployment Requirements (ie. the requirement for fibre based deployments in Greenfield estates)	Federal Government
Wholesale Services	Federal Government
Retail Services	Federal Government

Figure 4-1 - Role of Government

Communications Alliance's response to the specific questions on the role of government is as follows :

Question	Communications Alliance Response
Q.1 What are the relative merits of the models outlined? Which is the preferable approach? Why	R.1 A hybrid approach involving the Federal Government and State / Territory / Local Government as described above is recommended
Q. 2 Is any action required by the Australian Government to facilitate local councils and planning authorities requiring the installation of FTTP facilities?	R.2 Yes – it is recommended that the Australian Government convene a stakeholder group involving these bodies and other stakeholders such as service providers, developers and customer groups that can investigate and manage the development of guidelines, specifications, templates to facilitate the implementation of the FTTP Greenfield policy. Communications Alliance is able and willing to represent the telecommunications industry through its involvement in such a working group. Also see section 3 above for further detail on

	Communications Alliance plans to facilitate industry work on the FTTP Greenfields policy through its NBN Early Stage Deployments work.
Q.3 Would the preparation of model laws, templates and/or national specifications or guidelines assist local councils and planning authorities with implementation?	**R.3** Yes – this is considered essential in order to achieve the objectives of the FTTP Greenfields policy in the timeframe indicated.
Q.4 Would the development of educational tools for industry assist? If so, what?	**R.4** Yes – these will be important to communicate the changes, impacts and responses necessary to implement the policy. Communications Alliance can assist in the development of these tools through the its NBN Early Stage Deployments work
Q.5 Would the introduction of a certification system for the installation and performance of FTTP networks be beneficial?	**R.5** Communications Alliance believes certification will be necessary to ensure consistency across different estates, developers and FTTP networks. This work can be considered further in the planned NBN Early Stage Deployments work which will also look at international experience in this regard as well as the costs and benefits of such a certification system.
Q.6 To what extent is a nationally co-ordinated approach preferable to one where state and territory or local governments take the lead?	**R.6** As discussed above, Communications Alliance is strongly of the view that a nationally co-ordinated approach is essential. Communications Alliance is able and willing to assist in this co-ordination.

4.2   Other roles and responsibilities

Figure 2 of the consultation paper seems to indicate that developers would be obliged to comply with requirements for FTTP Infrastructure.

If the FTTP Infrastructure includes the actual optical fibre cable, then Communications Alliance wish to point out that carriers, as the owners of the telecommunications network unit that supplies a carriage service to the public, would seem to also be a party obliged to comply with the obligations.

Question	Communications Alliance Response
Q.7 If the Australian Government were to place obligations on developers and builders, at what stage of development should obligations be placed and on whom?	**R.7** Communications Alliance has no comment at this stage but welcomes ongoing consultation.
Q. 8 Is there scope for the provision of lead-ins in greenfields to be made contestable?	**R.8** The roles and responsibilities in respect of lead-ins needs to be considered in conjunction with the definition of the network boundary point for FTTP networks. Currently the network boundary point in FTTP networks is the customer side of the network termination device or Optical Network Termination (ONT) and as a result lead-ins are the responsibility the carrier as they are part of the network unit. To change this would require re-definition of the network boundary point so that lead-ins would not be part of the network unit owned by the carrier. Any changes in this area would need to be seriously considered with respect to possible impacts on customer service levels and operational costs.

4.3   Greenfield Estate Definition

Communications Alliance agrees that the FTTP Greenfield policy should apply across residential, business, commercial, industrial and mixed zone use areas. The social and economic benefits of FTTP apply across all these types of development areas and the ubiquitous availability of services is important in developing the benefits and market for new and innovative broadband services.

Question	Communications Alliance Response
Q.9 What is the appropriate number of lots or premises required for a development to qualify as a Greenfield development requiring FTTP? What other issues or factors should inform the definition	**R.9** Communications Alliance has no comment at this stage but welcomes ongoing consultation.
Q.10 What mechanisms could be	**R.10** Communications Alliance has no comment at

used to achieve a consistent approach across large developments involving multiple developers and/or over an extended period of time? For example, what provision should be made in relation to estates in which lots are released over a number of years?	this stage but welcomes ongoing consultation.

4.4   Multi-dwelling Units and Office Blocks

Communications Alliance agrees that the objective of providing a minimum 100 Mbps service regardless of whether the Greenfield site is multi-dwelling, office or residential is important in achieving near ubiquitous deployment of NBN capable services.

The type (copper or fibre), availability, and quality of in-building cabling in multi-dwelling units and office blocks will be important factors in achieving the minimum 100Mbps objective. This cabling is the responsibility of the building owner[5] and as a result it will be necessary to mandate standards via building codes or other regulations to ensure that in-building cabling will support a minimum of 100Mbps.

Question	Communications Alliance Response
Q.11 Are there any special requirements for multi-dwelling units or office blocks?	R.11 In order to ensure a minimum of 100Mbps is available to all units and offices it will be necessary to mandate standards for in-building copper cabling (including line lengths etc). The technical work required can be performed within the Communications Alliance NBN End User Premises work area.
Q. 12 Should the threshold for the connection of FTTP for new multi-dwelling units be lower than other estates or should all new multi-dwelling units be connected with FTTP? What threshold, if any, should apply?	R.12 Communications Alliance has no comment at this stage but welcomes ongoing consultation.

4.5   Fibre To The Premises

Communications Alliance agrees that the legislation and regulations should provide carriers and service provider scope and flexibility in how they achieve the overall FTTP Greenfields policy objectives.

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[5] The network boundary point in multi-dwelling units and offices is the customer side of the main distribution frame, unless otherwise agreed.

This is important because the investment and risks involved are significant and the choice of various technology deployment and upgrade options will depend on a range of factors and are likely to change over time.

Examples of the technology options today include :

- Point to Multi-point Passive Optical Networks (PON) deploying splitters[6] including :

    o Gigabit Passive Optical Networks (GPON)

    o Ethernet Passive Optical Networks (EPON or GEPON)

    o 10 Gigabit Ethernet Passive Optical Networks (10G – EPON)

    o Wavelength Division Multiplexing Passive Optical Network (WDM-PON)

    o Radio Frequency Passive Optical Networks (RF-PON)

- Point to Multi-Point Active Optical Networks (AON) using active equipment such as switches, routers or multiplexers[7]

- Point to Point fibre without splitters[8]

As a result the characteristics used to define FTTP in Greenfields estates need to be specified in a way which focuses on the outcomes rather than particular technology to be used.

Such a simple definition could be as follows :

  "An access network, using optical fibre transmission, capable of delivering peak data rates of at least 100Mbps downstream per end user premise"

The consultation paper raises the question of connection of FTTP networks to the wider telecommunication network via backhaul transmission networks. This is an important issue that needs to be considered in the planning, design and implementation of each FTTP network as connection to the wider telecommunications network is a core requirement to provide the necessary services and meet any-to-any connectivity regulatory requirements.

The carrier responsible for owning and deploying the FTTP network (the "FTTP Carrier") has the prime responsibility to ensure such wider connectivity can be achieved as efficiently and effectively as possible. In some cases the carrier will make arrangements using its own network capabilities to achieve this goal. In other cases the carrier will need to arrange backhaul transmission services using third party transmission suppliers. As a result arrangements need to be place that ensure an FTTP Carrier can access backhaul as necessary in order to connect to the wider telecommunications network.

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[6] Most commonly used in residential deployments

[7] Most commonly used in business, corporate or campus style deployments

[8] Most commonly used in business or corporate deployments

As pointed out in the consultation paper, the Australian Government has recognised the need for competitive backhaul transmission services and has commenced an initiative of funding for backhaul blackspots.

Question	Communications Alliance Response
Q.13 What specified characteristics should be considered for the purposes of defining FTTP for greenfields?	R.13 The characteristics used to define FTTP should be based on the outcomes rather than the technology to be deployed. In particular the focus should be on providing the capability to support specified data rates rather than any particular FTTP technology.
Q. 14 Are there particular issues in relation to backhaul between Greenfield estate and point of interconnection to a national network that need to be considered?	R.14 Arrangements for backhaul supply will be important to ensure interconnection with the national network. Greenfields estates in different locations are likely to be subject to different backhaul costs depending on geographic circumstances and the existing availability of backhaul services.

4.6   Exemptions

Exemptions from the requirement to ensure FTTP infrastructure is deployed in Greenfield estates need to be considered in conjunction a number of issues such as :

- Cost of FTTP infrastructure deployment

- Remoteness from wider telecommunications network (ie. Backhaul cost)

- Special geographic circumstances (eg. Environmental, heritage issues)

These areas are broad in scope and involve a range of factors that will be important in examining if and where there should be exemptions from the FTTP Greenfield policy objectives.

Question	Communications Alliance Response
Q.15 What exemption arrangements, if any, would be appropriate and how should they be administered?	R.15 Arrangements for exemptions should be considered in respect of costs, remoteness and special geographic circumstances as described above.
Q. 16 Are there any particular circumstances under which	R.16 See response to Q.15 above

developments should be exempt from the Australian Government's requirements for FTTP in greenfields (for example, for large area subdivision in rural and remote Australia)?	

4.7   Commencement Date

As discussed in this paper, Communications Alliance recommends the establishment of a stakeholder group to address the issues regarding the FTTP Greenfields policy and provide assistance to relevant parties in order to be able to implement the policy effectively and efficiently.

Communications Alliance will commence work on some of these issues in its NBN Early Stage Developments work area shortly and is able to represent the telecommunications industry in such a stakeholder group as soon it is established.

In order to meet the 1 July 2010 commencement date it will be necessary for the various stakeholders, including the telecommunications industry, to commit resources and priority to addressing the issues, clarifying the framework and implementing the outcomes.

It is our view that the 1 July 2010 commencement date is achievable and will ensure that the necessary urgency is given to undertaking the work required.

Question	Communications Alliance Response
Q.17 Are there any factors that the Australian Government should be aware of in relation to the commencement of the FTTP requirements?	R.17 In order to meet the timeframe the Australian Government should establish an FTTP Greenfields stakeholder group as soon as possible to analyse, plan and co-ordinate the implementation of the policy. Communications Alliance is able and willing to represent the telecommunications industry in such a working group.
Q. 18 Under what circumstances, if any, should transitional arrangements allow for the installation of copper-based infrastructure?	R.18 This should be considered by the FTTP Greenfields stakeholder group at an early stage

Q. 19	R.19
Should the FTTP requirement apply to developments approved before 1 July 2010 but for which telecommunications infrastructure has not yet been contracted or provided? What transitional arrangements may be appropriate in these circumstances?	This should be considered by the FTTP Greenfields stakeholder group at an early stage

5 COMPETITION AND REGULATORY FRAMEWORK

5.1 Role of NBN Company

The Australian Government has announced that the scope and role of the NBN Company will be considered as part of the Implementation Study. As discussed in section 3, Communications Alliance is planning to undertake a lead role in co-ordinating and facilitating industry work related to the NBN.

This work will address the scope and role of the NBN Company and the outcomes will be shared with the Australian Government and its consultants as part of the Implementation Study consultation process.

Question	Communications Alliance Response
Q.20 Is the Australian Government's intention that the NBN company not overbuild existing FTTP developments in Greenfield estates appropriate?	**R.20** Communications Alliance agrees with the position that the NBN Company should not overbuild FTTP deployments in Greenfield estates where these estates enjoy outcomes comparable to those to be delivered by the NBN.
Q. 21 Are there any specific issues that should be considered in relation to the role of the NBN company in Greenfield estates?	**R.21** This issues will be considered in the NBN Reference Model and Early Stage Deployments work areas and the outcomes shared with the Australian Government.

5.2 Competition to Service Greenfield Estates

As outlined in the consultation paper, there are currently some examples where the FTTP Carrier is chosen using a competitive process. However, this market is at an early stage of development and there remain significant risks and uncertainties that are likely to deter some companies from entering this market.

Communications Alliance see its NBN work as providing a forum where many of the issues can be debated and discussed in a manner that provides more certainty for prospective FTTP Carriers.

Question	Communications Alliance Response
Q.22 What measures could the Australian Government introduce to facilitate competition for the provision of FTTP infrastructure in Greenfield developments?	**R.22** Competition will be facilitated in FTTP deployments if the uncertainties and risks associated with the development of infrastructure by carriers are clearly understood and managed in a way that encourages investment.

	Communications Alliance is facilitating industry work in this area through its NBN Early Stage Deployments work.
Q. 23 Could the competitive provision of FTTP in greenfields be facilitated by a national online database of proposed developments accessible either publicly or to licensed carriers? Could this also assist with the planning of telecommunications infrastructure in such estates?	**R.23** This issues will be considered in the NBN Early Stage Deployments work area and the outcomes shared with the Australian Government.

5.3   Competition in the Services Layer

The competitive regime to apply in the context of the NBN is being reviewed as outlined in the Australian Government's Discussion Paper titled "Regulatory Reforms for 21st Century Broadband"[9]. Part of this review will no doubt consider FTTP Greenfield estates given that in many cases they are demonstrating the possible future benefits and scenarios that can apply in an NBN framework.

Communications Alliance has not responded to the competitive reform sections of the Australian Government's Discussion Paper, rather its individual members have put forward their own submissions.

Communications Alliance is of the view that the questions raised in the consultation paper should be considered in the wider context of the regulatory review being conducted as outlined above. Wherever possible the same principles that apply for the development of broadband services generally should apply to FTTP Greenfield estates.

Question	**Communications Alliance Response**
Q.24 to Q. 29 Questions on competition in the services layer	**R.24 to R.29** These questions should be considered in the broader context of the regulatory review being conducted as part of the Australian Government's "Regulatory Reforms for 21st Century Broadband". However effective competition in the Service Layer will depend on a national approach being taken to deploying FTTP Greenfields networks and the definition of appropriate wholesale services that enable retail service providers to deliver services across a national market.

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[9] See Chapter 3 "Regulatory Reforms for 21st Century Broadband"

	Comms Alliance has identified work on an NBN Reference Model and Wholesale Services as priority areas which need to be addressed in industry forums as early as possible[10]

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[10] See NBN Industry Connection Discussion Paper No. 2 – "Tackling the NBN Questions – Proposed Way Forward for Industy" available at www.commsalliance.com.au

6 OBLIGATIONS TO SUPPLY RETAIL SERVICES

The consumer safeguard framework is also being reviewed as part of the Australian Government's 21st Century Broadband regulatory review[11]. Part of this review is likely to consider the impact of FTTP Greenfield estates on consumer safeguards in an NBN framework.[12]

Question	Communications Alliance Response
Q.30 to Q33 Questions on obligations to supply retail services	R.30 to R.33 See Communications Alliance response to Chapter 4 of Regulatory Reform paper

7 REPORTING

Communications Alliance agrees that reporting of relevant statistics on FTTP Greenfield developments is important, especially in the early market development stage. This information can help identify issues early that may be impeding the development of the market. It also allows progress to be monitored against other relevant benchmarks.

The reporting requirements will be considered in the NBN Early Stage Deployments work group to be facilitated by Communications Alliance.

Question	Communications Alliance Response
Q.34 How would progress in delivering FTTP in Greenfield estates be best monitored and reported?	R.34 Communications Alliance will address the issue of monitoring and reporting relevant progress statistics as part of its NBN Early Stage Deployments work. Any such processes should however not place an undue burden on industry and be minimal in nature.

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[11] See Chapter 4 – "Regulatory Reforms for 21st Century Broadband"

[12] See submission by Communications Alliance to "Regulatory Reforms for 21st Century Broadband" www.commsalliance.com.au

8   NEXT STEPS

Communications Alliance welcomes further consultation on the FTTP Greenfields policy and implementation.

Furthermore, as indicated in section 3, Communications Alliance is able and willing to participate in the stakeholders group foreshadowed in the consultation paper.

As the self-regulatory body of the telecommunications industry, Communications Alliance is well positioned to represent industry in the development of the policy and its assist in its implementation.

Other stakeholders who should be represented in the group should include federal, state and local governments, customer representative groups, developers, and build contractors with expertise in the area.

Question	Communications Alliance Response
Q.35 What further steps should be undertaken to support this initiative?	**R.35** As outlined in section 3, Communications Alliance recommends the establishment of an FTTP Greenfields stakeholder group to progress the planning and implementation of the policy.
Q.36 Would the establishment of a stakeholder group assist with the implementation? If so, how many members would be appropriate, and who should be represented? What should be its terms of reference?	**R.36** As outlined in section 3, Communications Alliance recommends the establishment of an FTTP Greenfields stakeholder group. Membership should include government, customer groups, developers, build contractors and telecommunications representatives. Communications Alliance has no comment on possible draft terms of refernce stage but welcomes ongoing consultation.

Communications Alliance was formed in 2006 to provide a unified voice for the Australian communications industry and to lead it into the next generation of converging networks, technologies and services.

In pursuing its goals, Communications Alliance offers a forum for the industry to make coherent and constructive contributions to policy development and debate.

Communications Alliance seeks to facilitate open, effective and ethical competition between service providers while ensuring efficient, safe operation of networks, the provision of innovative services and the enhancement of consumer outcomes.

It is committed to the achievement of the policy objective of the Telecommunications Act 1997 - the greatest practicable use of industry self-regulation without imposing undue financial and administrative burdens on industry.