



# PERTH AIRPORT

## **Further submission to Productivity Commission**

### **Response to the Inquiry into Economic Regulation of Airport Services**

1 November 2011

Responding to ACCC submission dated October 2011

Explanatory Note: On 4 October 2011 Westralia Airports Corporation change its name to Perth Airport Pty Ltd

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## Overview

This further submission by Perth Airport to the Productivity Commission responds to the ACCC submission to the Productivity Commission dated October 2011 (**ACCC October Submission**). The ACCC October Submission was made in response to the Productivity Commission's Draft Report on the Economic Regulation of Airport Services dated August 2011 (**Draft Report**).

In brief, it is Perth Airport's submission that the conclusions and proposals made in the ACCC October Submission:

- Are unsubstantiated or based on flawed assumptions;
- Would, if accepted, result in poorly targeted regulation that would be of highly uncertain effect.

The ACCC proposals are, in effect, that the ACCC's preferred form of regulation be adopted without a proper analysis to determine the nature of the problem or if there is a problem that necessitates regulatory intervention. The ACCC seeks to avoid a proper analysis of the issue and so rejects price inquiry<sup>1</sup> under Part VIIA of the *Competition and Consumer Act 2010 (CCA)* or the assessment involved in declaration under Part IIIA.<sup>2</sup>

Perth Airport submits that the better approach is that mapped out in the policy and purpose of the CCA, in both Part VIIA and Part IIIA, that a proper analysis is undertaken of each facility and service in question to determine the nature of any problem *prior to* deciding what, if any, is the appropriate form of regulation. The policy and purpose of the CCA recognises the high costs of getting regulation wrong.

## Key conclusions

Key conclusion #1 - The ACCC October Submission conclusion that airports exercise market power is unsubstantiated.

Key conclusion #2 - The ACCC October Submission makes a flawed assumption that deemed declaration would be a targeted regulatory response.

Key conclusion #3 - The ACCC October Submission makes a flawed assumption there is significant imbalance in commercial negotiations in favour of airports.

Key conclusion #4 - The ACCC October Submission conjectured welfare effects are unreliable.

Key conclusion #5 - The ACCC October Submission view of investment does not accord with the facts.

Key conclusion #6 - The ACCC October Submission makes a flawed assumption that its proposal would be light handed.

Key conclusion #7 - The scheme and purpose of the CCA is that a proper analysis is done before imposing or increasing regulation on a business.

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<sup>1</sup> ACCC October Submission, pages 7-8.

<sup>2</sup> The ACCC October Submission sees the declaration process set out in Part IIIA as 'difficulties associated with declaration' and is in favour of avoiding such difficulties, pages 11.

## Unsubstantiated conclusion - airports exercise market power

The ACCC October Submission uses the unsubstantiated conclusion, that airports exercise market power, as a basis for its proposal of a 'deemed declaration'. This is a flawed basis on which to base any proposal.

The ACCC October Submission starts by citing the Draft Report that a number of Australian airports have 'sufficient market power to be of policy concern'. However the remainder of the ACCC October Submission generally ignores the Commission's more nuanced view that market power is not necessarily being exercised by airports. Rather the ACCC proceeds on the basis of an unsubstantiated conclusion that airports are exercising market power.

In particular, the ACCC October Submission generally ignores the Commission's propositions that:

- Airports may in fact not have an incentive to exercise market power;<sup>3</sup> and
- Airlines may provide countervailing power in negotiations with airports such that any market power could not be exercised.<sup>4</sup>

The ACCC notes that it has monitored the performance of airports in various forms since 1997-98. However the ACCC can, on the basis of that monitoring, say no more than that it has 'identified trends' that 'raise concerns' that 'some airports may' have exercised market power.<sup>5</sup>

The ACCC has monitored the performance of airports in various forms since 1997-98. In recent airport monitoring reports, the ACCC has *identified trends* that *raise concerns* that *some airports may* have exercised their market power, particularly in the provision of aeronautical services (services provided to airlines) at Sydney Airport and landside services (such as car parking) at Melbourne Airport.  
[emphasis added]

Perth Airport considers that this highly qualified statement by the ACCC indicates that ACCC monitoring has not adequately substantiated that airports are exercising market power. Indeed, that the ACCC, the prime body with charged with and equipped to investigate market power issues in Australia, can not make a firmer statement about airports' market power after more than a decade of monitoring work must itself raise serious doubts about jumping to a 'solution' without further investigation.

Indeed, the ACCC October Submission admits (citing its own January 2011 *Airport Monitoring Report 2009-10: Price, financial performance and quality of service monitoring*) that evidence from its monitoring work that airports are earning monopoly rents is inconclusive. The ACCC could conclude only that 'a more detailed evaluation ... would be required'.<sup>6</sup>

However, the airport monitoring results do not in themselves provide conclusive evidence as to whether or not the airports are earning monopoly rents for aeronautical or landside services such as car parking. The airport monitoring results only provide for indirect indicators of economic efficiency.

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<sup>3</sup> Draft Report, page 44.

<sup>4</sup> See for example, Draft Report, Box 9.5.

<sup>5</sup> ACCC October Submission, page 3.

<sup>6</sup> ACCC October Submission, page 6.

Nevertheless, in comparing the market characteristics and expected outcomes against the information provided to the ACCC, observations can be made that raise questions about the airports' performance. The ACCC concluded that a more detailed evaluation of the major airports' performance – which is beyond the scope of a monitoring exercise – would be required to make more definitive findings.

### **Flawed assumption - deemed declaration would be a targeted regulatory response**

Perth Airport submits that deemed declaration, as advocated by the ACCC, is the antithesis of a targeted regulatory response as it would entirely dispense with an assessment of whether binding arbitration is appropriate in particular circumstances. In addition, without having the benefit of assessment of the declaration criteria, there would be no way of knowing whether binding arbitration would be 'fit-for-purpose'.

The ACCC October Submission asserts or assumes that deemed declaration of airports would be 'a targeted regulatory response'.<sup>7</sup>

Therefore, the ACCC favours deemed declaration over the formal declaration process under Part IIIA. Importantly, deemed declaration of aeronautical services would address the imbalance of bargaining power between airports and airlines, and facilitate the development of commercial relationships while avoiding the difficulties associated with seeking declaration. This approach would encourage the airports to behave as if their activities were carried out in a competitive marketplace and recognises that each of the major airports operates in a different market, enabling a *targeted regulatory response*.

[emphasis added]

Similarly, the ACCC October Submission elsewhere describes the application of Part IIIA of the *Competition and Consumer Act 2010* (Part IIIA) via a deemed declaration as 'fit-for-purpose'.<sup>8</sup>

The ACCC offers no convincing explanation of how deemed declaration can reasonably be described as a targeted regulatory response or of how it could be fit for purpose. However Perth Airport considers that the ACCC's view must be based on a significant misunderstanding of Part IIIA.

As the Commission is aware, Part IIIA is a 2 stage process.<sup>9</sup> The first stage, declaration, is a careful assessment of the declaration criteria in sections 44G(2) and 44H(4) by both the National Competition Council and the Minister (and, on review, the Competition Tribunal) against the state of competition in the affected markets, the nature of the particular facility and the effect of declaration of the particular service on the public interest.

If the declaration criteria are assessed to be met in the particular circumstances then declaration is made. When declaration has been made, an access seeker may seek recourse to binding arbitration in the event that access negotiations are not successful. The negotiations under threat of binding arbitration are stage 2 of the Part IIIA process.

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<sup>7</sup> ACCC October Submission, page 11.

<sup>8</sup> ACCC October Submission, pages 5, 10 and 12.

<sup>9</sup> *Pilbara Infrastructure Pty Ltd v Australian Competition Tribunal* [2011] FCAFC58, para 1.

In summary, the primary purpose of the Part IIIA stage 1 declaration process is to assess whether it is appropriate in all the circumstances for binding arbitration to be available to an access seeker. In other words, the policy behind Part IIIA carefully targets binding arbitration as a regulatory response only where the declaration criteria are met.

The ACCC has proposed that airports be the subject of deemed declaration. Deemed declaration would entirely dispense with the assessment of whether binding arbitration is appropriate in the circumstances. Accordingly deemed declaration is the antithesis of a targeted regulatory response. In addition, without having the benefit of the assessment of declaration criteria, there is simply no knowing whether a declaration and binding arbitration would be 'fit-for-purpose'.

*ACCC explanation why deemed declaration is appropriate for airports does not accord with regulatory principle*

The ACCC October Submission dismisses the important assessment of whether binding arbitration is appropriate in the circumstances as 'the difficulties associated with seeking declaration' and considers that these 'difficulties' should be avoided.<sup>10</sup> Rather the ACCC October Submission offers the following explanation for why airports should be declared:<sup>11</sup>

The ACCC considers that declaration is appropriate for aeronautical services as there is a history of airlines negotiating with airports, relatively small numbers of airlines, and vertical separation of the airport and airline businesses.

Perth Airport submits that it is unclear how the above explanation for why airports should be deemed declared under Part IIIA accords with regulatory principle. Perth Airport notes the following issues with the ACCC's explanation:

- Firstly, the ACCC October Submission observes that there is a history of airlines negotiating with airports. This observation accords with Perth Airport's experience.<sup>12</sup> However this history of negotiations taking place seems more to be a reason to *not* invoke Part IIIA through declaration, which has been described by the courts as providing 'an enforceable right to negotiate the terms of access'.<sup>13</sup>
- Secondly, the ACCC October Submission notes the vertical *separation* of airports and airlines. Again this seems to count *against* the ACCC's case for deemed declaration rather than for it. The "'Essential Facilities' Problem" identified by the Hilmer report, and which was the policy motivation for Part IIIA, primarily arose in circumstances where the owner of an essential facility is vertically *integrated* with potentially competitive activities in upstream or downstream markets.<sup>14</sup>

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<sup>10</sup> ACCC October Submission, page 11.

<sup>11</sup> ACCC October Submission, page 11.

<sup>12</sup> Perth Airport 8 April 2011 Submission to Productivity Commission, pages 38-41.

<sup>13</sup> *Pilbara Infrastructure Pty Ltd v Australian Competition Tribunal* [2011] FCAFC 58, para 1. See also para 29 and *In the matter of Fortescue Metals Group Limited* [2010] ACompT 2, para 8.

<sup>14</sup> See Hilmer, pages 240-242.

The ACCC October Submission at page 10 makes broad reference to pages 240-241 of Hilmer but fails to note Hilmer's view at footnote 3 that, in circumstances where there is no vertical integration (which the ACCC confirms is the case with airports and airlines),<sup>15</sup> whether a particular facility is brought under an access regime or prices oversight should be considered on a *case by case basis*.<sup>16</sup> This runs entirely counter to the ACCC view that declaration of airports should be deemed en masse.

Perhaps realising the weakness of its argument, the ACCC October Submission asserts that 'airports are vertically integrated in the market for landside services, such as car parking'.<sup>17</sup> The ACCC offers no explanation of the nature of the vertical integration 'in the market for landside services'. The ACCC appears to suggest that there is vertical integration from airside services to landside services however Perth Airport submits that this use of the concept of vertical integration would be novel indeed and may bear little resemblance to the concept used in Hilmer or mainstream economic literature.<sup>18</sup>

Similarly the ACCC October Submission asserts that airports have the 'ability to affect competition in related markets such as air services'.<sup>19</sup> The ACCCs offer no explanation of how competition in related markets such as air services might be affected by airports, much less do they point to any evidence that suggests that there is any such effect on competition in related markets.

### **Flawed assumption - there is significant imbalance in commercial negotiations in favour of airports**

The ACCC October Submission proceeds on the flawed assumption that there is a significant imbalance in commercial negotiations in favour of airports that would be corrected through the ACCC's preferred form of regulation.<sup>20</sup> However as the Commission observed in the Draft Report this cannot be assumed as airlines may exercise countervailing negotiating power.<sup>21</sup>

In addition Perth Airport reiterates the analysis and evidence set out in section 3.4 of its submission dated 8 April 2011 regarding the absence of any abuse of market power which Perth Airport considers is due in large part to countervailing power held by airlines. Perth Airport submits that the ACCC has not addressed or rebutted this analysis and evidence.

Perth Airport submits that many of the parties that Perth Airport negotiates contracts with for landside and airside services are large well resourced and commercially focussed corporations that have a presence at many airports, including airports outside Australia.

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<sup>15</sup> ACCC October Submission, page 11.

<sup>16</sup> The last paragraph on page 240 which continues on page 241 of Hilmer discusses the circumstances where a facility owner is not vertically integrated, noting that there will be 'little incentive to deny access' but that price monitoring or surveillance might be appropriate. Footnote 3 at the end of that paragraph relevantly states:

Whether the issues arising in relation to a particular facility would be best addressed under the access regime or prices oversight process would be considered on a case-by-case basis.

<sup>17</sup> ACCC October Submission, page 11.

<sup>18</sup> Church and Ware, *Industrial Organization* (Irwin McGraw-Hill), 2000 at page 76 describes vertical integration in the following terms: 'When a firm at stage A decides to make input B rather than buy it from an independent input supplier (or vice versa) it vertically integrates'.

<sup>19</sup> ACCC October Submission, page 11.

<sup>20</sup> ACCC October Submission, pages 4, 8, 11, 13 and 16.

<sup>21</sup> Draft Report, pages 50-56, 201-202.

These parties are able to bring to bear, on negotiations with an airport such as Perth Airport, the substantial knowledge and experience they have accrued in negotiating at many airports. The knowledge brought to negotiations by such parties is likely to include (operating and capital) cost structures and feasible investment and capacity expansion timelines. By way of example, the Qantas group has a presence at 182 airports, including international, Australia and those served by codeshare partner airlines.<sup>22</sup>

As noted above, users of airport services are often large well resourced and commercially focussed corporations with multinational operations. By way of example, the multinational car rental company Avis Budget Group, a user of airport landside services, has annual global revenues of approximately US\$5 billion. This is more than 25 times the revenues earned by Perth Airport.<sup>23</sup> Similarly, Hertz has global annual revenues of approximately US\$7 billion;<sup>24</sup> Qantas has revenues of AU\$14.9 billion;<sup>25</sup> and Virgin Australia has revenues of AU\$3.2 billion.<sup>26</sup>

Perth Airport submits that airlines in particular have proved themselves adept at lobbying governments and government agencies to pursue and protect their own interests. Perth Airport fully accepts that airlines are expected and entitled to pursue and protect their interests however Perth Airport would be concerned if the ACCC did not sufficiently vet their claims for self interest.

### **The ACCC's conjectured welfare effects are unreliable**

The ACCC's approach to welfare effects are overly theoretical and inconsistently applied and therefore unreliable to apply to questions of real world regulation.

The ACCC October Submission at page 14 attempts to dismiss the Commission's statement that demand for airport services is relatively inelastic by asserting that such demand is not perfectly inelastic and therefore there will be negative welfare effects. In the context of decisions relating to regulating real world business this sort of highly theoretical approach sheds very little light on the real issues. Perfect inelasticity is, like the concept of perfect competition, a theoretical construct that may be useful as a point of reference in academic papers but has no place in discussions of actual regulation or market analysis. The ACCC has therefore failed through this argument to establish that there will be any *material* impact on welfare.

If the ACCC October Submission was concerned with the finer points of market elasticities it may have been more circumspect regarding its claims that the presence of more price sensitive passengers would result in greater welfare losses.<sup>27</sup> It is a matter of uncontroversial economics, without resort to highly theoretical constructs, that any loss of price sensitive passengers will result in low welfare losses. This is all the more so in air travel where price discrimination is widely practiced by airlines.

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<sup>22</sup> Qantas Factfile, page 1 at <http://www.qantas.com.au/infodetail/about/FactFiles.pdf>.

Accessed on 26 October 2011.

<sup>23</sup> Submission to the ACCC by Westralia Airports Corporation on the 3 May 2010 collective bargaining notification by Hertz, 12 May 2010, page 9.

<sup>24</sup> Submission to the ACCC by Westralia Airports Corporation on the 3 May 2010 collective bargaining notification by Hertz, 12 May 2010, page 9.

<sup>25</sup> Qantas summary of full year results for year ended 30 June 2011 at <http://www.qantas.com.au/travel/airlines/investors-full-year-results-2011/global/en>. Accessed on 26 October 2011.

<sup>26</sup> Virgin Australia 2011 Annual Report at page 2.

<sup>27</sup> ACCC October Submission, page 14.

The overall result is that any losses of both consumer and producer surplus (and therefore overall welfare) would be low.

Perth Airport submits that the simplistic calculation, which the ACCC October Submission concedes is only an estimate,<sup>28</sup> only highlights the point that further analysis may be required to determine the nature and extent of any issue before a solution is offered. The calculations certainly do not support the ACCC contention that its preferred solution, blanket deemed declaration, be imposed on the industry without further analysis. The ACCC might take its own advice to the Commission that further empirical work should be done before it reaches a conclusion about what the appropriate regulatory response is.<sup>29</sup>

### **The ACCC's view of investment does not accord with the facts**

Perth Airport submits that the ACCC view about expected investment behaviour by insufficiently regulated monopolies simply do not accord with the facts so far as they relate to airports. This misunderstanding of the facts regarding investment at airports significantly undermines the ACCC's claims that blanket deemed declaration of airports is required without further analysis.

The ACCC October Submission argues that appropriate regulation of airports will support investment outcomes. The ACCC argument is prefaced by the following statement about monopolies and investment. In short, the ACCC states that a monopoly facing a lack of effective regulation will restrict output including through delaying investment or underinvestment:<sup>30</sup>

With regard to the impact of regulatory risk on investment, the ACCC notes that normal profit-maximising behaviour for an unregulated monopoly business is to restrict output and create shortages, so as to be able to raise prices and maximise profits. A lack of effective regulation of monopoly infrastructure could therefore lead to a situation of inefficient overcharging, held up or delayed investment, or underinvestment. The ACCC reiterates that there is evidence that suggests access regulation supports investment in a number of regulated industries.

The issue with this statement is that ACCC predictions about expected investment behaviour by insufficiently regulated monopolies simply do not accord with the facts so far as they relate to airports. These facts are in evidence before the Commission and, in another context, the ACCC.

The Board of Airline Representatives of Australia (**BARA**) which represents most of the international airline carriers using Australian airports has been consistent in its views regarding the adequacy of airport capacity and investment. The following statement, taken from the ACCC determination granting BARA authorisation to negotiate with airports on behalf of its member airlines, confirms that essential airport services are abundant and that there are few capacity constraints:<sup>31</sup>

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<sup>28</sup> ACCC October Submission, page 15.

<sup>29</sup> ACCC October Submission, page 15.

<sup>30</sup> ACCC October Submission, page 12.

<sup>31</sup> ACCC *Determination: Application for revocation and substitution of an authorisation*, Authorisation no.: A91200, 14 May 2010, paragraph 4.72.



BARA further submits that essential airport services are abundant and that

[t]his is due to the fact that Australian aviation infrastructure experiences relatively few capacity constraints... there is little or no ability for one airline to obtain a commercial advantage over another airline through the use of those abundant services.

Consistent with that view BARA in submissions to the Commission in the current inquiry BARA has stated that the current price monitoring regime has delivered an environment favourable for airports to undertake substantial investment programs.<sup>32</sup> BARA notes that most airports have undertaken and continue to undertake large capital investment programs.<sup>33</sup> BARA considers that current returns support required investments and, if anything, BARA considers that investment levels are higher than fully justified in some instances.<sup>34</sup> Perth Airport has previously noted the challenges with timing investment to minimise new investment either leading or lagging demand however it is Perth Airport's experience that the current regime has made it demonstrably easier than under previous regulation to make timely investments in airport infrastructure.<sup>35</sup>

The ACCC also fails to properly recognise the significant progress that has been made in the nature of commercial relationships between Perth Airport and airlines, under the current regulatory regime, including the comprehensive long term agreements that have been reached with many airlines, including Qantas.

All of the above is significantly at odds with the ACCC's view that airports are not sufficiently regulated and that insufficiently regulated monopolies do not invest sufficiently or under invest to restrict output.

### **Flawed assumption - ACCC proposal is light handed regulation**

The ACCC October Submission repeatedly asserts that its proposal of deemed declaration would be light handed.<sup>36</sup> Perth Airport submits that simply deeming facilities to be declared without assessing whether that is an appropriate form of regulation would be heavy handed. Assessing whether declaration is appropriate would come through applying the declaration criteria or some other form of targeted assessment.

The only support that the ACCC can muster for its position confirms that a proper assessment to target where and how regulation should be applied is an indispensable element of light handed regulation. A proper assessment would include that provided by the declaration process in Part IIIA of assessing the facility and market circumstances against the declaration criteria. As stated in the ACCC October Submission:<sup>37</sup>

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<sup>32</sup> BARA Submission to the Productivity Commission's inquiry into price regulation of airport services, April 2011, page 7.

<sup>33</sup> BARA Submission to the Productivity Commission's inquiry into price regulation of airport services, April 2011, page 34.

<sup>34</sup> BARA Submission to the Productivity Commission's inquiry into price regulation of airport services, April 2011, page 28.

<sup>35</sup> Perth Airport 8 April 2011 Submission to Productivity Commission, section 3.3.1.

<sup>36</sup> ACCC October Submission, pages 1, 8 and 10.

<sup>37</sup> ACCC October Submission, page 10.

The National Competition Council (NCC) has found *the declaration process* and the possibility for arbitration to be a non-intrusive form of regulation [emphasis added]

The ACCC October Submission suggests that deemed declaration will result in few disputes being arbitrated<sup>38</sup> and that arbitration would be a 'fallback' only.<sup>39</sup> Perth Airport submits that this view does not accord with the experience under Part XIC of the CCA. The analysis and data set out at Annexure 1 shows that there have been no less than 92 arbitrations under Part XIC of the CCA for declared telecommunications services which as the ACCC should well know is contrary to its assertion the deemed declaration will result in few disputes.

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<sup>38</sup> ACCC October Submission, page 10.

<sup>39</sup> ACCC October Submission, pages 1, 8 and 11.

## Annexure 1 - Arbitrations under Part XIC of the *Competition and Consumer Act 2010* (Cth)

Under Part XIC of the *Competition and Consumer Act 2010* (Cth) (CACs Act) there is no general right of access to telecommunications services. The ACCC must first 'declare' the relevant service under Division 2 of Part XIC. Upon request, the access provider is then obliged to supply the service to an access seeker in line with standard access obligations as set out under Division 3 Part XIC.

Part XIC also empowers the ACCC to arbitrate telecommunications access disputes in relation to a declared service. The ACCC can arbitrate an access dispute only when:

- a declared service is supplied or proposed to be supplied by a carrier or carriage service provider
- one or more standard access obligations apply or will apply to the carrier or carriage provider regarding the declared service
- an access seeker is unable to agree with the carrier or carriage service provider regarding the terms and conditions under which the carrier or carriage service provider is to comply with the standard access obligations; and
- no final access determination in relation to the declared service has come into force.

The number of arbitrations notified under Part XIC since 2005, and as reported by the ACCC in its annual telecommunications reports, is noted in the table below:

Service		Disputes lodged 2005-06	Disputes lodged 2006-07	Disputes lodged 2007-08	Disputes lodged 2008-09	Disputes lodged 2009-10	
Fixed Line	PSTN	4					
	ULLS	6	2	12	5		
	LSS	3	3	9	1	2	
	WLR		2	1		1	
	LCS		2	1			
	DTCS	1	1				
	Facilities Access						
	DDAS						
Mobile	MTAS	14	9	5	6	2	
<b>Total number of arbitrations</b>		<b>28</b>	<b>19</b>	<b>28</b>	<b>12</b>	<b>5</b>	<b>92</b>

Corresponding to the table on the previous page, the table below provides further detail of telecommunications companies that were party to the various arbitrations. However this table only provides full detail for the years 2005/06 and 2006/07.

The ACCC generally issues annual telecommunications reports that include, amongst other things, details of the access disputes that were notified by various telecommunications companies in any given year. The ACCC telecommunications reports that were issued in 2005/06 and 2006/07 specified the various parties to a dispute, while the reports that followed in subsequent years only identified the number of access disputes notified to the ACCC.

Subsequently, the table below lacks full detail for the years 2007/08 onwards.

In order to obtain the missing party information, Perth Airport has sought to rely on media releases notifying access disputes. However it appears that the media releases weren't issued for access disputes beyond 2007/08.

Perth Airport has also reviewed the arbitration determinations published from 2008-10 in the hope of verifying the access disputes that were arbitrated during that period. However, during that period the ACCC only published final determinations for those arbitrations that covered the entire spectrum of issues that related to a given service being considered. Arbitrations that only dealt with a subset of issues relating to the service in question, and which were subsequently joined to the larger arbitration, were not publicly identified.

Service		Disputes lodged 2005-06	Disputes lodged 2006-07	Disputes lodged 2007-08	Disputes lodged 2008-09	Disputes lodged 2009-10
Fixed Line	PSTN	Optus Networks/Telstra (x2) Optus Mobile/Telstra (x2)				
	ULLS	Optus/Telstra Chime/Telstra XYZed/Telstra Primus/Telstra PowerTel/Telstra Request Broadband/Telstra	Adam Internet/Telstra TPG Internet/Telstra	Macquarie/Telstra TPG Internet/Telstra Optus/Telstra NEC/Telstra Agile/Telstra Soul/Telstra Chime/Telstra TransACT/Telstra Primus/Telstra	Amcom/Telstra	Chime/Telstra

			XYZed/Telstra Request Broadband/Telstra PowerTel/Telstra		
LSS	Chime/Telstra Amcom/Telstra Request Broadband/Telstra	Amcom/Telstra Primus/Telstra Network Tech/Telstra	Adam Internet/Telstra Agile/Telstra Chime/Telstra EFTel/Telstra TPG/Telstra Saunders/Telstra Request Broadband/Telstra Wideband/Telstra Netspace/Telstra		
WLR		Optus/Telstra Primus/Telstra	Digiplus/Telstra		
LCS		Optus/Telstra Primus/Telstra	Digiplus/Telstra		
DTCS	Chime/Telstra	Netspace/Telstra			
Facility Access					
Mobile	MTAS Telstra/Optus Telstra/Hutchison Telecoms Telstra/Hutchison 3G Vodafone/Hutchison Telecoms Vodafone/Hutchison 3G AAPT/Vodafone Optus/Telstra	Telstra/Optus Mobile Telstra/Optus Networks PowerTel/Hutchison 3G Optus Mobile/Vodafone Optus Networks/Vodafone Optus Mobile/Telstra Optus Networks/Telstra Telstra/Vodafone	Telstra/Optus Mobile Telstra/Optus Networks Optus Mobile/Telstra Optus Networks/Telstra Telstra/Hutchison 3G	Telstra/Hutchison 3G Telstra/Optus Mobile Telstra/Optus Networks Optus Mobile/Telstra Optus Networks/Telstra	

	Telstra/Vodafone Hutchison Telecoms/Telstra Hutchison 3G/Telstra Optus/Hutchison Telecoms Optus/Hutchison 3G AAPT/Hutchison Telecoms AAPT/Hutchison 3G	Telstra/Hutchison 3G			
Total	28	19			