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## **F a c s i m i l e**

**TO:** Ms Lynette Williams  
Telecommunications Inquiry  
Productivity Commission

**Fax No.:** 02 6240 3311

**CC:** Ross Wraight, chief Executive  
Colin Blair, General Manager Standards & Technical Writing Division  
Liz Jurman, Director, Corporate & Public Affairs  
Roger Lyle, Director Communications IT & e-Commerce

**FROM:** Peter Walsh, Executive Director

**REF:** PNW/lg/3749 Inquiry

**DATE:** 3<sup>rd</sup> October 2000

**SUBJECT:** INQUIRY – TELECOMMUNICATIONS COMPETITION REGULATIONS

**No. of pages including this one:** 2

Dear Ms Williams,

I refer to the Productivity Commission circular dated 8 June 2000, Issues Paper dated 30 June 2000 and a number of e-mails from Mr John Williams.

As the recognised peak non-government standardization body in Australia, it would be inappropriate for Standards Australia to comment on those issues related to competition between the various suppliers of telecommunications services. However, we do have a view on aspects of the infrastructure that facilitate competition.

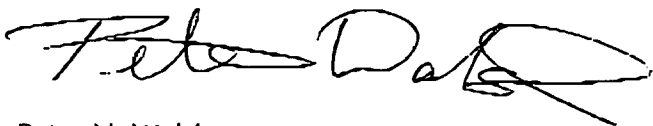
Standards Australia is a strong supporter of the concept of industry self-regulation based on appropriate risk management assessment. Australian Standards, that have been prepared by Standards Australia for nearly 80 years, have been so used as self regulatory documents by business, industry and the community. Only when industry and business is unable to regulate itself should regulations be implemented. For this reason, Standards Australia was a strong supporter of the general direction of the Telecommunications Act 1997 in regard to self-regulation. In this regard Standards Australia supports the activities of the Australian Communications Industry Forum and remains ready to assist where and when required.

With regard to the issues raised in the Issues Paper under "Technical standards about the interconnection of facilities (Division 5 of Part 21)", Standards Australia offers the following comments:

- Government should only set standards (and mandate them) if industry is unable to set them and voluntarily adhere to them.
- In setting standards, whether by government, ACIF, Standards Australia or other means, it is essential to have meaningful and consensus participation of end users and regulatory authorities (ACCC and ACA).
- Standards Australia is a strong supporter of the preparation of standards in performance (outcome) terms. In doing so, we recognise that standards in areas such as interconnection do, in most cases, need to be preceptive especially where different technologies and systems exists.

I would be pleased if you could keep me informed of developments in this inquiry.

Kind regards

A handwritten signature in black ink, appearing to read 'Peter Walsh', with a stylized flourish at the end.

Peter N. Walsh  
Executive Director