RG 120901
3 December 2009

Communications Alliance

By email

NBN Wholesale Service Definition Framework - Ethernet
Draft for Comment

Macquarie Telecom Pty Limited ("**Macquarie**") wishes to submit comments to Communications Alliance Ltd ("**CA**") on CA's draft Wholesale Service Definition Framework - Ethernet. [1]

Macquarie understands that the purpose of the WSDF is to define a suite of wholesale services which arise within the draft reference model as developed by CA. In turn, the wholesale service definitions are intended to inform NBN Co of the generic wholesale services that industry anticipates that NBN Co will eventually provide.

Macquarie is of the view that the scope of services that NBN Co provides should be at the lower levels of the wholesale value chain. This is necessary to allow retail service providers the scope to sufficiently differentiate their retail service offerings and at the same time ensure that NBN Co does not provide high level retail services which could potentially be supplied to retail customers. In particular, Macquarie believes that uncontended Layer 2 Ethernet services would form the core services that NBN Co supplies.

It is clear that each of three wholesale services as described in the WSDF are Layer 2 Ethernet services. As this is consistent with Macquarie's position, Macquarie fully supports the WSDF. Macquarie commends CA on its work to date and looks forward to the further development of this important matter.

Yours sincerely

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[1] National Broadband Network Wholesale Service Definition Framework – Ethernet, Draft for Comment, Communications Alliance, November 2009 ("**WSDF**")