

**Company Name:** Optus

**Contact Name:** Mark Shingler

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**Feedback:** Optus welcomes the opportunity to provide feedback on Telstra's proposal to vary the Migration Plan in regards to Special Services disconnections. This feedback is built around Optus' goal of maintaining continuity of service for its customers and ensuring all migrations occur in a seamless manner. To this end Optus supports the proposed changes to migration arrangements for Special Services and Special Services Inputs i.e. business services, that 1. Delay the commencement of any disconnection activity until 29 January 2019 for those services with a SSDD of 12 November 2018 and 2 Provide an In-Train Order process to business customers that have placed a NBN Co order. Whilst Optus supports any framework that provides continuity of service for our customers, upon further review of the operational impacts of Telstra's proposed ITO amendments to include non-NBN Co networks, Optus considers that at such a late stage in its migration planning, this proposal is likely to be contrary to this goal. There is also a clear risk that the additional 170 business days ITO period would allow other carriers to aggressively build out fibre therefore bypassing the opportunity for businesses to benefit from competition on the nbn.