

mate, and that reducing timeframes for certain network activities could cost approximately \$18.6m, compared to NBN Co's \$60m estimate.

For fixed wireless performance thresholds, HoustonKemp estimated costs of around \$7.5m over five years for a 50Mbps benchmark, compared to NBN Co's estimate of \$39.4m.

HoustonKemp's advice notes that differences in estimates reflect, among other factors, differing assumptions about how performance objectives would be applied and the extent to which existing performance levels already meet proposed standards.

The ACCC's corrected capex figures and the HoustonKemp advice form part of the ongoing consultation on NBN Co's replacement module application, with a final determination due in June.

Grahame Lynch

## **OneWiFi pushes MVNO, prepaid inclusion in UOMO bill before Senate committee**

OneWiFi & Infrastructure has called for amendments to the federal government's proposed Universal Outdoor Mobile Obligation bill, warning the current framework risks excluding mobile virtual network operator and prepaid customers.

In a submission to the Senate inquiry into the bill, the company argued the regime should explicitly extend to users accessing services via mobile virtual network operators and prepaid plans.

"These users often include regional Australians, First Nations communities, and low-income households — the very groups that universal service policy is intended to protect," it said.

OneWiFi also raised concerns about provisions designating Telstra, Optus and TPG Telecom as the primary providers under the regime, arguing this "risks entrenching oligopoly power and potentially excluding wholesale or neutral-host solutions".

It proposed an amendment allowing the minister to designate an additional carrier or carriage service provider where it is capable of delivering equitable access, including providers operating wholesale models supporting MVNOs.

The submission also pointed to language in the explanatory memorandum suggesting technical or plan-based limitations could restrict access to UOMO services.

"Without safeguards, MNOs could make UOMO access contingent on higher-value or post-paid plans, excluding pre-paid and MVNO customers," the company said, adding that device compatibility requirements raise broader questions about the maturity of low Earth orbit satellite technologies underpinning the framework.

OneWiFi further warned that the bill does not require mobile network operators to provide services on a non-discriminatory basis across retail channels, creating a potential compliance gap.

"This opens a loophole whereby obligations are technically met but consumers are practically excluded," it said.

The company urged the inquiry to support amendments requiring the obligation to be delivered on an equitable basis across all retail pathways, including MVNO and prepaid users, provided devices are technically compatible with 4G networks.

It also called for explicit non-discrimination provisions to ensure primary providers treat their own retail customers and those of MVNOs on an equivalent basis.

Rohan Pearce

## **ACCC consults on Superloop functional separation plan tied to Lynham deal**

The Australian Competition and Consumer Commission has opened consultation on a proposed joint functional separation undertaking from Superloop, lodged as part of its \$165 million acquisition of Lynham Networks and its retail arm Lightning Broadband.

The regulator said the undertaking, submitted under section 151C of the Telecommunications Act, would apply to all local access lines controlled by Superloop, including those to be acquired through the Lynham transaction, and covering superfast broadband services supplied primarily to residential customers.

Submissions close on 8 May, with a final decision expected in late May.

The proposal formalises a functional separation model across Superloop's wholesale and retail operations, allowing the group to continue supplying retail services while complying with carrier separation rules that would otherwise require wholesale-only operation.

Under the structure, Lynham Networks would operate as the Superloop wholesaler, supplying wholesale local access services, while retail activities would sit across multiple entities including Superloop Broadband, Exetel, Veda Networks and Lightning Broadband.

Superloop has also structured its network layer through infrastructure entities such as VostroNet and Frontier Networks, which will supply network assets to the wholesaler but will not directly sell wholesale or retail services.

The undertaking requires separation of wholesale and retail functions across branding, staff, systems and decision-making, alongside non-discrimination obligations. Retail and wholesale staff must operate independently, with separate management, systems and incentive structures, subject to limited shared corporate and network engineering services.

The ACCC said acceptance of the undertaking would provide Superloop with greater commercial flexibility to integrate and expand its fibre footprint, while maintaining safeguards intended to promote competition and protect wholesale customers.

Its preliminary view is that the model is likely to support infrastructure-based competition and increase downstream retail choice, compared with a counterfactual in which Superloop would be restricted to wholesale-only supply.

Grahame Lynch

## **Australia ranks sixth for digital resilience, Singapore leads APAC: report**

Australia ranked sixth globally for digital resilience in a study by Economist Impact, which pointed to growing exposure to ecosystem risks and external system depend-