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## **TELSTRA CORPORATION LIMITED**

### **Submission in response to the Remaking the Telecommunications (Payphone Performance Benchmarks) Record-Keeping Rules 2012 - consultation 48/2021**

**31 January 2022**



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Telstra endorses the ACMA's proposal to remake the Telecommunications (Payphone Performance Benchmarks) Record-Keeping Rules 2012 (RKR's), given that they are due to sunset on 1 April 2022; that any changes would need to reflect changes to the payphone benchmark instruments the RKR's are used to monitor; and that the parallel review of the benchmark instruments is not likely to result in substantial changes given the limited time before they sunset.

In Telstra's view substantial changes should be made to both sets of instruments as soon as practicable to ensure the regulations reflect the contemporary use and management of payphones. We therefore propose that both sets of instruments (including the RKR's) be extended for a limited period no greater than one year to allow for a considered and comprehensive review to be conducted, with the resulting changes made to both sets of instruments in parallel.