



14 November 2024

Matthew Tsikrikas
IPART Principal Analyst
By email: [REDACTED]

Dear Matthew,

RE: IPART Draft report - Review of rents for communication sites on certain Crown land – Request for additional evidence on Co-User fees.

Optus is pleased to provide further information in response to IPART's request via email of 12 November 2024, to assist the Tribunal's deliberations, by providing any additional evidence to support the position that in the private market co-users do not pay rent to the landlord unless they require additional land.

Prior to outlining the evidence below Optus wishes to raise our concerns in the strongest possible terms, that this request appears to have come about following a report commissioned by the land management agencies to review co-user agreements in the private market, which NSW Crown Lands (DPHI) has then referenced in its submission to IPART of 16 October 2024 as showing "that co-user agreements in the private market are commonplace and highly valued".

This report dated 30 September 2024 prepared by Total Site Solutions Pty Ltd trading as siteXcell, whilst presenting well visually, lacks in detailed content containing little apart from broad sweeping statements that, despite the inclusion of 19 pages of appendices, are not supported by market evidence of a statistically significant sample size, lacks adherence to valuation methodology or accepted property principles around sub-leasing and has been prepared by authors who appear not to have disclosed a serious conflict of interest.

Had we been given more time to respond to IPART's request a more detailed response could have been prepared but due to time constraints we would like to briefly address in the following pages some of the key issues that Optus feel need to be called out.

Conflict of Interest

On page 26 of the siteXcell report the authors claim they have included a "detailed statement of experience outlining the directors' qualifications and relevant project history to further substantiate the credibility of the information and analysis provided". Yet nowhere in the report do the authors disclose that Total Site Solutions Pty Ltd is wholly owned by Everest Infrastructure ANZ Pty Ltd and that the companies both share 4 of the same Directors. Company searches for both



Total Site Solutions Pty Ltd and Everest Infrastructure ANZ Pty Ltd have been included as attachments.

This relationship matters as Everest Infrastructure are one of 4 Lease Aggregator companies all originating from the USA operating in the Australian Telecommunications market. Interestingly in the siteXcell report over 35 pages where the authors impart their "extensive industry experience", "deep understanding of the historical context", "and market dynamics" the activities of Lease Aggregators in the market do not get a mention, even where they should have in the Relevant Industry Trends section on page 16 where in the first column half way down the page at the second bullet point there is discussion of upfront payments as part of carriers strategies to reduce rents (will expand on this point further below).

Lease Aggregators effectively insert themselves between property owners and tenants (typically telecommunications companies or neutral host tower owners) by entering into a concurrent lease underneath some or all existing rooftop, tower and adjoining ground leases, and/or entering into separate deeds, sale and purchase agreements or other arrangements not registered on land title that effectively assign the property owners rights to collect rent. Then once existing lease agreements on the property expire carriers and tower owners are forced to negotiate new agreements with the Lease Aggregators rather than direct with property owners.

Typically, these Lease Aggregators are using overseas investors funds to buy what they view as relatively stable income streams from the telecommunications leases on the basis that if they get a critical mass of sites the carriers or tower owners will not have the resources to move a significant number of sites. Even though expiring leases have often been escalating at fixed % annual increases well above long term average CPI and passing rents on expiry are well above market, the Lease Aggregators seek to maintain the cash flows they purchased and when negotiating commencing rent for renewed tenure are reluctant to meet the market .

Given the business model of Everest Infrastructure it is clear to see that neither the lease aggregators nor organisations owned by them, would have any interest in presenting a "market intelligence report" that talks about rents being adjusted downwards to current market levels. Further it would be in their interest to use and IPART determination to seek to widen the co-user fee structure into the private market where it predominately does not currently exist, so that they can extract more fees from sites they control. It could be construed that far from being independent "Telco Property Experts" siteXcell are active market participants with vested interests.

In Optus view, in light of the activities undertaken by Everest Infrastructure, any reasonable person would consider that in the very least this failure to disclose Everest Infrastructure as the owners of Total Site Solutions Pty Ltd trading as siteXcell calls into question the independence and credibility of the information and analysis contained in their report.

Errors in methodology and interpretation of market

Some of the positions put forward by the land management agencies and siteXcell fail to apply commonly accepted property principles, likewise application of standard valuation methodology in analysis of market evidence is similarly lacking. As such many of the conclusions drawn in the siteXcell report fail to satisfy the requirements of IPART's terms of reference to have a rent structure that reflects fair market based returns. This is demonstrated on numerous occasions throughout the siteXcell report and land management agency cover letters which rely heavily on the siteXcell "market intelligence report" to make their case.

One of the key issues is the confusion / combination of the term "Co-User" and the practice of "Co-Location", as demonstrated in the Terms and Definitions section on page 4 of the siteXcell report, which has been done in an attempt to make the case that there is a statistically significant body of evidence to suggest that so called "Co-Users" who do not occupy additional real estate outside of the tower owners leased area should be charged a Co-User fee.

Co-users, Co-location and Site Sharing

The concept of co-users at a site and the way NSW Government Land agencies and IPART has applied this in the past is not consistent with the private market. So called "Co-users" and particularly the currently applied policy that they should pay regardless of whether they are sharing the site under a Joint Venture, are co-located wholly within the Tower owner / Primary users leased area (compound), or separately lease their own adjoining ground lease area, is not the way the broader private market operates.

The term more commonly used by participants in the market is Co-location. When mobile telecommunications networks were first established by Carriers it was common industry practice that a Carrier wishing to co-locate on another's tower would, where practical to do so, enter their own separate ground lease adjoining the tower owners leased area. In some cases where Carriers shelters were located within the tower owners leased compound a Sliver lease, typically of a nominal area usually 1 square metre adjoining the compound. Both types of co-location leases were entered into principally to give the Carrier rights to 'Step Up' into the tower owners leased area if the tower owner vacated the site. Inter Carrier agreements also meant that co-locating Carriers would also receive a discount on their tower rentals if they entered into a separate ground tenure agreement with property owners. Over time this practice has become less common as Carriers have divested

their tower assets and moved to a neutral host model where step up rights are no longer available.

The broader market treats Co-locating users at a site in one of two ways:

1. **In Compound** – when located wholly within the tower owner's leased area with no separate tenure agreement and as a sub-tenant of the tower owner, in accordance with accepted property principles of sub-leasing, the property owner is not entitled to any additional fees or rent.
2. **Adjoining Ground Lease** – where the co-locating carrier or user has its ground equipment located outside of the tower owners leased area and enters a direct tenure agreement with the underlying property owner, typically of a smaller leased area than tower lease area with equipment in the adjoining ground lease area being limited to the co-locating party's equipment shelter only and in some cases back up power generator.

Site Sharing under a Joint Venture arrangement (e.g.: the Optus and TPG JV) is different to co-location in that one Carrier will take the lead and enter into the tenure agreement for the site with the sharing Carriers equipment integrated with the lead Carriers equipment, all contained within the leased area of the lead Carrier. In the private market the sharing Carrier typically has no direct relationship with the property owner. It is worth noting that either of the co-location examples in 1 or 2 above could also be a site that is shared under a Joint Venture arrangement, where under the NSW land management co-user fee structure the sharing carrier is required to pay a co-user fee despite occupying no additional real estate outside of the lead carriers leased area. Similarly, to point 1 above this practice does not align with standard property principles on sub-leasing nor the practice with the overwhelming majority of tenure agreements in the private market for Telco leases.

For complete transparency and to demonstrate the latest evolution in the Australian telecommunications market Optus and TPG/Vodafone have recently entered into a Multi Operator Core Network or MOCN service agreement where Optus will provide TPG customers with service in regional areas. This agreement is no different to other wholesale agreements we have to resell our network which occurs using only Optus equipment on the site. No TPG equipment will be deployed on the site, no tenure is created for TPG and no TPG technicians visit the sites. This being the case there should be no suggestion that Co-User fees apply to a MOCN site.

By continuing with the current "co-user" classifications where a "user" of a site pays regardless of whether they are site sharing under a JV, co-locating as an in compound sub-tenant or co-locating via an adjoining ground lease occupying additional real estate, does not reflect the way leases operate in the private market where typically only co-locating carriers occupying additional real estate pay rent to the property owner.

The market evidence of tower leases overwhelmingly has unfettered rights to sub-lease to other users if contained within the tower owners (Primary user) leased area. Likewise there is ample evidence to support a co-locating (co-user) entering into a separate ground lease with the land owner if they are occupying real estate in addition / separate to the tower owners leased area. Co-location and sliver leases are not evidence of willingness to pay Co-User fees on sites where no additional tenure or real estate is occupied outside of leased areas, rather it is reflective of previous market conditions and deployment practices.

Based on above it is Optus considered position that the land management agencies and siteXcell have failed to satisfy point a) in the IPART terms of reference which states that the Tribunal is to have regard to "fair, market based commercial returns" when it comes to charging co-user fees to sub-tenants that do not occupy additional real estate.

Other unsubstantiated claims in siteXcell report

The siteXcell report contains many broad generalisations and sweeping statements that are not supported by any evidence and cannot be allowed to be reported as "facts" without being corrected.

On page 16 in the first bullet point siteXcell claim that many carrier deployment programs have been co-funded by government agencies and makes the accusation of Carriers "using public moneys to secure lower rentals" going on to claim that "Given this context, we believe many newly negotiated leases are not representative of true market conditions". These statements are simply untrue government funding can only be used towards cost of site acquisition and build it cannot be applied to initial or ongoing rental payments.

On the same page the report then goes on to claim that Carriers "had aligned strategies to significantly reduce prevailing rentals" what the report fails to acknowledge is that many of the typically 20-year-old leases had been established using fixed 5% annual escalation rates that were applied during the entire 20 year term without review to market, when long term average CPI over same period was under 3%, thus resulting in passing rents on expiry that were well above current market.

The claim is then made that the "Use of upfront payments to landowners in an effort to coerce them into rental arrangements that, in the long term, represent poor value", is particularly galling given the Lease Aggregator companies like siteXcell's owner Everest Infrastructure are the primary users of upfront payments to landowners in their efforts to entice them into a concurrent lease or other arrangement to secure control of the site and rental cashflows from telco occupiers, with such concurrent lease arrangements often increasing costs to carriers not only in terms of rental but operational costs associated with ongoing use and upgrading of sites. In my 14 years at Optus the only times we have offered upfront payments

is when we have been forced to match offers made by lease aggregators in order to secure tenure at our sites, only a handful ever progressed to be formalised in the form of a lease renewal.

Claims are made throughout the report that sites on Crown Lands somehow offer "distinct advantages" and should attract a rent premium when compared to sites in the private market. Comments in the second column on page 16 include "The original sites situated on Crown land hold greater strategic value compared to recently acquired sites, predominately representing infill coverage rather than the backbone network infrastructure". No further details are provided to substantiate these claims and they fail to acknowledge that sites on Crown land are part of a larger interconnected Network, typically Crown land holdings are so vast that users have no choice other than to locate on Crown land if they want to provide a network that consumers, including many government departments and emergency services, demand.

At the bottom of page 18 siteXcell make the comment that:

The Tower Infrastructure Companies, in particular, are generating substantial and increasing revenue streams from site-sharing fees charged to operators using their tower infrastructure. This commercial success presents a compelling case for a reassessment of their fee structure. There is a strong argument that these companies should be subject to a differentiated fee regime that more accurately reflects the commercial benefits they accrue from their use of Crown land.

There is no compelling case or strong argument made to support these claims and in fact they fail to recognise that the commercial benefits tower infrastructure companies accrue are not due to any intrinsic value in the underlying Crown land or for that matter land of any of the landlords in the private market, rather the commercial benefits arise from the physical tower assets that they purchased and now have to pay to maintain, a cost that previously sat with the Carrier when they were tower owner. Additionally particularly in the case of Carriers the revenue the tower infrastructure companies obtain are negotiated in network wide Master Service Agreements (MSA) that as part of the fee structure require them to provide Carriers with other services that for example could include provision of emergency generators to keep sites on air, deployment of temporary sites to ensure continuity of coverage if a site needs to be replaced / relocated, acquisition of new permanent replacement sites, all costs previously incurred by carriers that are now rentalised in arrangements with neutral host infrastructure owners that have no relationship to underlying land value.

At the top of second column on page 20 siteXcell pose the question:

It is important to question why industry proponents are advocating for the removal of Co-User fees when these fees don't directly impact their operations. The primary benefit to



It is important to clarify here that Optus are not advocating for removal of co-user fees where extra real estate is occupied, in the case of adjoining ground leases there is an established market for these agreements. We are advocating for removal of co-user fees for in compound co-locations and Joint Venture Site Sharing partners where no extra real estate is occupied, especially when leases which make up the overwhelming weight of comparable market evidence have full rights to sub-lease or sub-licence at no additional cost. This is consistent with the IPART terms of reference to reflect arrangements in the private market. Further it is untrue to claim they don't directly impact our operations, they add to complexity and costs of doing business which means less money to deploy new sites or upgrade existing sites, or increased costs passed through to the end consumer.

On page 21 half way down the first column siteXcell make the comment it is unclear whether the InfraCos are willing to accept the responsibility for in-compound subtenants. This demonstrates a lack of understanding of the fundamental concept of property law in that head tenants are directly responsible for the actions of their sub-tenants. Similarly they claim on page 18 that having direct agreements with all users will be more effective in resolving problems than holding the primary tenant responsible for the actions of the subtenants. In our experience this is not the case and only leads to subtenants trying to apportion blame to each other. Having a single head tenant responsible for actions of the sub-tenants actually streamlines the point of contact / responsibility for the property owner, which interestingly is a selling point that Lease Aggregators like siteXcell owner Everest often use in their negotiations with property owners to secure control of sites.

Given more time we would have liked to prepare a more detailed response to many of the inaccurate or incomplete information contained in within the siteXcell report upon which land management agencies have relied and presumably IPART will consider. In our view the above sample demonstrates a lack of understanding of the market, property principles and valuation methodology along with a conflict of interest on the part of siteXcell.

Optus market evidence on co-user fees

In response to IPART's request for additional evidence Optus can provide to support our position that in the private market, co-users do not pay rent to the landlord unless they require additional land, I have undertaken an analysis of all 19,074 rent records in Optus October 2024 monthly tenancy schedule generated from our SAP accounting system which provides us with details of all payments made across our Network property portfolio.

Records (contracts) from SAP are downloaded monthly into an excel spreadsheet Tenancy Schedule Report which we use internally for all manner of property management and reporting functions. In the following pages utilising snips from this report I will provide details of the existence of co-user fees and sliver leases within our portfolio.

Each row in the report represents a contract in SAP for various purposes the Sub contract type in column AE in below snip is used to categorise the various types of agreements. There are a total of 7 Co-User Access fee classifications and applying filters to select all these, as demonstrated in the bottom left hand corner of the snips below, results in a total of 125 records of the 19,074 records in the tenancy schedule or 0.0065% of all payment records / contracts in our network portfolio. Further 4 of these contracts will be terminated in future. Average annual payment across these 125 contracts is \$11,335 pa.

Contract Name	BU	RM	Street	Postal code	City	Region	Vendor name	Tenure type name	Sub contract type name	Contract Start	Term end date	Legal Lease Start Date	Legal Lease End Date
"FUTURE INACTIVE" 14TW TOOWOOMBA 80361 *PO 0/221355	14TW	80361	CNR POPLAR/HURLEY ST RESERVOIR PR	4350	TOOWOOMBA	QLD	DEPARTMENT OF RESOURCES	TERMINATION - MAKE INACT	CoUser Access - Other	1/07/2003	28-Apr-24	29-Apr-04	28-Apr-24
"FUTURE INACTIVE" 14PE LONGREACH 80287	14PE	80287	WONGA ST COUNCIL WTR RES	4730	LONGREACH	QLD	LONGREACH REGIONAL COUNCIL	TERMINATION - MAKE INACT	CoUser Access - Other	1/08/2000	30-Jun-24	01-Jul-99	30-Jun-24
137 137E MT BENSON 40079 *NO 002/2707*	137E	40079	MAIN SOUTH EASTERN ROAD	5275	MOUNT BENSON	SA	DEPARTMENT FOR ENVIRONMENT AND	LICENCE	CoUser Access - Aisium	1/01/2006	31-Oct-04	01-Jan-05	31-Oct-16
663 3426 WOODCOOR 80561 *PERMIT 003/0059	3426	80561	SUNRISE ROAD	4565	TEWANTIN	QLD	ENVIRONMENTAL PROTECTION AGENC	LICENCE	CoUser Access	1/08/2010	31-Jul-25	01-Aug-03	30-Jun-10
1045 68E ALBANY 2 P0188 22444 688849 *MT EVERY SYRS ON 15T	68E	P0188	MT CLARENCE/AFEX DRIVE	6330	ALBANY	NW	DEPT OF LANDS	LICENCE	CoUser Access - Aisium	1/01/2006	31-Dec-25	01-Jan-06	31-Dec-25
1212 03P PAXTON 50002 *10/749*	03P	50000	OLD NORTHERN RD	2154	CASTLE HILL	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Aisium	1/05/2005	30-Apr-16	01-May-05	30-Apr-10
1216 1204 50271 QUAKERS HILL *510 WATER* 101749	1204	50271	CNR QUAKERS ROAD & STATION STREET	2763	QUAKERS HILL	NSW	SYDNEY WATER CORPORATION	LEASE	CoUser Access - Aisium	30/04/2005	30-Apr-26	30-Apr-05	30-Apr-20
1222 23P MACQUARIE M2 11088 MOTORWAY VIMERA RD MARSHFIELD	23P	31108	HILLS MOTORWAY OPP END VIMERA RD	2122	MARSHFIELD	NSW	HILLS MOTORWAY LTD	NO LEASE ON FILE	CoUser Access - Aisium	8/03/1999	30-Apr-26	08-Mar-99	30-Apr-17
1223 23T CARRIS HILL 51146 *SYDNEY WATER 36 SPINNO* 101747	23T	51146	CNR 6TH & 23TH AVENUES	2171	WEST HORTON	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Aisium	1/05/2005	30-Apr-16	01-May-05	30-Apr-10
1229 2NWP BA BROWN MOUNTAIN 52446 *LIC 569192*	2NWP	52446	OLD BEGA ROAD	2663	STEEPLE FLAT	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/06/2016	31-May-26	01-Jun-16	31-May-36
1506 44E CHINCHILLA 80276 P0209308 *ASS 113136* *PO 0/209308	44E	P0276	COLUMBA STREET WATER TOWER	4413	CHINCHILLA	QLD	DEPARTMENT OF RESOURCES	LICENCE	CoUser Access - Other	1/09/1996	31-Aug-26	19-Nov-97	31-Aug-16
1635 44WV WILD HORSE MOUNTAIN PKED 80081 *PERMIT OPT 3893	44WV	80081	WILDHORSE ROAD	4533	GLASSHOUSE MOUNTAINS	QLD	HQP PLANTATIONS P/L	LICENCE	CoUser Access - Aisium	1/11/2007	31-Dec-16	01-Nov-10	31-Dec-23
1606 241LITHGOW 50117 *LIC 626203	241L	50117	NEAR HASSANS WALL	2790	LITHGOW	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Other	22/11/2021	21-Nov-26	22-Nov-21	21-Nov-41
1723 32EC EXCELSIOR 51857 *101539 *CASTLE HILL RESERVOIR *7342*	32EC	51857	MARIE STREET	2154	CASTLE HILL	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Aisium	1/11/2002	01-Dec-26	01-Nov-02	01-Dec-12
1728 02TC TUGGERONONG HILL 1600T STRANERS 50815 BLOCK 0 36C27C	02TC	50815	OFF BENNETT STREET	2905	BONTHONT	ACT	ACT PLANNING & LAND AUTHORITY	LICENCE	CoUser Access - Aisium	9/11/1995	06-Dec-26	09-Nov-95	06-Dec-14
1729 2328 ACT GEM / BELCONNEN 50618 BLVD 06C14 BELCONNEN	2328	50618	PART ACTION BUS DEPOT COULTER DRIV	4651	BELCONNEN	ACT	ACT PLANNING & LAND AUTHORITY	LICENCE	CoUser Access - Aisium	9/11/1995	06-Dec-26	09-Nov-95	06-Dec-14
1803 58118 WARBONIN LAKE 58118 *M2MA 204368*	58118	58118	OFF EDROM ROAD	2551	EAST BOYO	NSW	FORESTRY CORPORATION OF NEW SO	LICENCE	CoUser Access - Aisium	1/01/2017	31-Dec-26	01-Jan-17	31-Dec-36
1804 23WV DARLINGTON POINT CENTRAL 52393 *LIC 579592*	23WV	52393	CARRINGTON STREET	2708	DARLINGTON POINT	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Telstra	1/02/2017	31-Jun-27	01-Feb-17	31-Jun-27
1805 133M MARULAN BR 59751	133M	59751	SHEPPERS QUAIL HUME HIGHWAY	4071	MARULAN	NSW	KELL, STEPHEN JAMES	CONSIST LETTER	CoUser Access - Aisium	1/02/2003	31-Jan-27	01-Feb-03	31-Jan-27
1806 52ME MERVYNLANDS WEST 51824 *101561 *FRANK ST*	52ME	51824	39 BOWDEN STREET	2161	GUILDFORD	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Aisium	6/02/2003	06-Feb-27	06-Feb-03	06-Feb-20
2143 "FUTURE INACTIVE" 21EN EDEN 50198 *LIC 453542*	21EN	50198	PART PRINCES HIGHWAY NORTH	2551	EDEN	NSW	NSW DEPARTMENT OF PRIMARY INDU	TERMINATION - MAKE INACT	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2144 23WV NOWRA 50153 *LIC 410400*	23WV	50153	CAMBONARRA RD	2541	NOWRA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Other	31/01/1994	30-Jun-27	31-Oct-94	30-Jun-27
2151 23LQ MOUNT LAMBIE 50118 *LIC 409244*	23LQ	50118	Bonaventure Rd, off Gt West Hwy	2790	MOUNT LAMBIE	NSW	NSW DEPARTMENT OF PRIMARY INDU	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2152 123W BELLINGEN 50569 *LIC 409600*	123W	50569	SCOTCHMANS ROAD	2454	BELLINGEN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2156 123V COOROORVE HILL 50955 *LIC 420869*	123V	50955	TELSTRA BROADWAY ST	2626	COOROORVE HILL	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - ATN	1/10/2021	30-Jun-27	01-Oct-21	30-Jun-27
2176 230C COOMA 50208 *LIC 499378*	230C	50208	Mt Gladstone Trig Reserve	2630	COOMA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2178 232P FORSTER 50140 *LIC 455098*	232P	50140	PART LIKELY STREET	2420	FORSTER	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2179 230F BRIFFITH 50193 *LIC 408777*	230F	50193	PIONEER PARY	3680	BRIFFITH	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2180 230U GUNDAGAI 50205 *LIC 408749*	230U	50205	TRIG STATION	2721	GUNDAGAI	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2182 23KX KYEMBA M2022 *LIC 408993*	23KX	M2022	KYEMBA	3000	MOUNT BURGWOODS VIC	VIC	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2183 230L LOKAMORES *MARR 202050* 06410479*	230L	M0156	Taharua Ridge Mt Look	3644	BOWRA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2184 23ME MIDDLE BROTHER (TAREE) 50143 *LIC 415206*	23ME	50143	RESERVE NO. 22323	2430	TAREE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/04/1995	30-Jun-27	01-Jul-07	30-Jun-27
2185 23MU MUNDONDOON 50202 *LIC 408663*	23MU	50202	PART MOUNT MUNDONDOON	2585	YASS	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2186 23M4 MACLEAN 50177 *LIC 408910*	23M4	50177	LOOKOUT ROAD PINNACLE HILL	2463	MACLEAN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2187 23MX MURWILLUMBAH 80238 *LIC 455293*	23MX	80238	Karamul Street	2484	MURWILLUMBAH	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/12/1995	30-Jun-27	01-Jul-07	30-Jun-27
2188 123A MTT TALAWAH 50141 *LIC 408755*	123A	50141	OFF PIPE CLAY CREEK ROAD	2315	NABiac	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2189 123T NORTHWOOD 50282 *LIC 450208*	123T	50282	ACT SIGHT STREET	2086	LONGVIEWILLE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - ATN	1/10/2021	30-Jun-27	01-Oct-21	30-Jun-27
2190 23PM PORT MACQUARIE 50144 *LIC 408959*	23PM	50144	TRANSIT HILL ORS STREET	2444	PORT MACQUARIE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2192 23W62 WAGGA WAGGA M0151 *LIC 453130*	23W6	50151	2417 WILLIAMS HILL PARK	2650	WAGGA WAGGA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	23/01/1995	30-Jun-27	01-Jul-07	30-Jun-27
2194 2215 YASS 50203 *LIC 408738*	2215	50203	PART MOUNT BOWNING TRIG RESERVE	2582	YASS	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2200 230M BLACK TRIG 51051 *LIC 412360*	230M	51051	PART LIMBROOK	2581	BOOKHAM	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2211 120L STANHOPE ROAD LINDFIELD 51071 *LIC 454580*	120L	51071	STANHOPE RD	2070	LINDFIELD	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2223 52L LILLAWONG 51190 *LIC 409689*	52L	51190	OLD LILLAWONG HIGHWAY	2234	LILLAWONG	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2236 82KA KAMA TOWN CENTRE 55738 *LIC 455089*	82KA	55738	CNR COLLINS & PERRALONG STREETS	2533	KAMA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2240 83TO MEMERIBULA 55807 *LIC 412383*	83TO	55807	SAPPHIRE COAST ROAD	2545	MERIBULA	NSW	DEPARTMENT OF LANDS	LICENCE	CoUser Access - Aisium	12/09/2002	30-Jun-27	01-Jul-07	30-Jun-27
2245 91C CONBERTON 51938 *LIC 428711*	91C	51938	JEVUS BAY RD	2540	FALLS CREEK	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - ATN	1/10/2021	30-Jun-27	01-Oct-21	30-Jun-27
2246 91CA LACE CARRELLIO 51489 *LIC 431368*	91CA	51489	HOME WOOD OFF LACHLAN VALLEY HWY	2671	LACE CARRELLIO	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Telstra	19/10/2004	30-Jun-27	19-Oct-04	30-Jun-27
2251 91N CONDOBOLIN 51690 *LIC 455288*	91N	51690	BRADY STREET	2871	CONDOBOLIN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2253 91TH ARDLETHAN 51732 *LIC 451162*	91TH	51732	VIA BURLEY BRIFFIN WAY	2665	ARDLETHAN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Aisium	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
2255 91TV NEEDLE MOUNTAIN 51739 *LIC 412361*	91TV	51739	OFF TV ROAD	2357	CONDOBOLIN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27

Further filtering on column Q to select sites located in NSW only shows that 101 of the 125 Co-User fees contracts relate to sites in NSW.

Contract Name	BU Numbr	RO Numbr	Street	Postal code	City	Region	Vendor name	Temure type name	Sub contract type name	Contract Start	Term end date	Legal Lease Start Date	Legal Lease end date
012F PADDSTW 50308 "D1748"	012F	50308	OLD NORTHERN RD	2154	CASTLE HILL	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Ascom	3/05/2009	30-Apr-26	01-May-09	30-Apr-20
120M BOTT QUAKERS HILL "PO W/ATER" D1749	120M	80271	CNR QUAKERS ROAD & STATION STREET	2163	QUAKERS HILL	NSW	SYDNEY WATER CORPORATION	LEASE	CoUser Access - Ascom	30/04/2006	30-Apr-26	30-Apr-06	30-Apr-20
312F MACQUARIE M2 51068 MOTORWAY VIMERA RD MARSHFIELD	312F	51068	HILLS MOTORWAY OPP END VIMERA R	2122	MARSHFIELD	NSW	HILLS MOTORWAY LTD	NO LEASE ON FILE	CoUser Access - Ascom	8/03/1999	30-Apr-26	08-Mar-99	30-Apr-17
321F CANES HILL 53148 "SYDNEY WATER 36 SPINDA" D1747	321F	53148	CHS ST & 25TH AVENUES	2171	WEST HORTON	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Ascom	1/05/2005	30-Apr-26	01-May-05	30-Apr-20
209F BA BROWN MOUNTAIN 416 "LIC 4589194"	209F	42446	OLD BEGA ROAD	2631	STEPPE FLAT	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/06/2016	31-May-26	01-Jun-16	31-May-26
221L LITHGOW 50117 "LIC 632403"	221L	50117	NEAR HASSANS WALL	2790	LITHGOW	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Other	22/11/2011	21-Nov-26	22-Nov-11	21-Nov-41
812C LIC 632403 "LIC 632403" CASTLE HILL RESERVE "0434"	812C	632403	CASTLE HILL	2154	CASTLE HILL	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Ascom	11/11/2002	01-Dec-26	11-Nov-02	01-Dec-16
812W WINDSOR HILL 58168 "ACMA 203496"	812W	58168	MARSH STREET	2154	CASTLE HILL	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Ascom	1/01/2013	31-Dec-26	01-Jan-17	31-Dec-26
2NUG DARLINGTON POINT CENTRAL 52399 "LIC 579593"	2NUG	52399	CARRINGTON STREET	2706	DARLINGTON POINT	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Telstra	1/02/2017	31-Jan-27	01-Feb-17	31-Jan-27
812M MARILYN HT 5579	812M	55791	SHIPPERS QUAY W/ Hume Highway	2579	MARILYN	NSW	HELLY STEPHEN JAMES	CONSENT LETTER	CoUser Access - Ascom	1/02/2003	31-Jan-27	01-Feb-03	31-Jan-27
51ME MERRILANDS WEST 51524 "D1561" FRANK ST	51ME	51524	39 BOVDEN STREET	2161	GULDFIELD	NSW	SYDNEY WATER CORPORATION	LICENCE	CoUser Access - Ascom	6/02/2003	06-Feb-27	06-Feb-03	06-Feb-20
FUTURE INACTIVE D 228 EDEN 50198 "LIC 453542"	228E	50198	PART FINANCERS HIGHWAY NORTH	2551	LEDEN	NSW	NSW DEPARTMENT OF PRIMARY INDU	TERMINATION - MAKE INACTI	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
012H2 NORWA 50153 "LIC 410200"	012H	50153	CARLEBERG RD	2541	NORWA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Other	31/10/1994	30-Jun-27	31-Oct-94	30-Jun-27
11G10 MOUNT LAMIE 50118 "LIC 40924"	11G1	50118	Bonavance Rd. off Old West Hwy.	2790	MOUNT LAMIE	NSW	NSW DEPARTMENT OF PRIMARY INDU	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
117H BELLINGEN 50569 "LIC 40960"	117H	50569	SCOTCHMANNS ROAD	2454	BELLINGEN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
127Y COGROVE HILL 50595 "LIC 426865"	127Y	50595	TULSITA BRIDGE HT	2626	COGROVE HILL	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - ATN	1/10/2011	30-Jun-27	01-Oct-11	30-Jun-27
21CO COOMA 50208 "LIC 499378"	21CO	50208	Mr Gladstone Trig Reserve	2630	COOMA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
212O FORSTER 50140 "LIC 455096"	212O	50140	PART LARKY STREET	2428	FORSTER	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
212P GRIFFITH 50153 "LIC 40837"	212P	50153	POWERS PLACE	2500	GRIFFITH	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/04/1999	30-Jun-27	01-Apr-07	30-Jun-27
212U GUNDAGUI 50205 "LIC 408748"	212U	50205	TRIG STATION	2722	GUNDAGUI	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
21D LIDA M0155 "M69830005" COOMA 10479"	21D	M0155	Tallego Ridge Mt Loka	2644	BOUNA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
21ME MIDDY 4 BRITHTER TRASSE 50193 "LIC 413390"	21ME	50193	RESEVE RD 2233	2520	TASSE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/02/2007	30-Jun-27	01-Feb-07	30-Jun-27
21MU MUNDODONE 50202 "LIC 408663"	21MU	50202	PART MOUNT MAUNDODONE	2582	YASS	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
21MV MACLEAN 50177 "LIC 409610"	21MV	50177	LOOKOUT ROAD PINNACLE HILL	2483	MACLEAN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
21MW MURWILLUMBAH 50158 "LIC 455233"	21MW	50158	Karara Drive	2484	MURWILLUMBAH	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/12/1996	30-Jun-27	01-Dec-96	30-Jun-27
21NA MT TALLAWAH 50141 "LIC 408765"	21NA	50141	OFF PIPE CLAY CREEK ROAD	2312	NABiac	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
21NT NORTHWOOD 50258 "LIC 632026"	21NT	50258	AT STUART STREET	2086	LONGUEVILLE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - ATN	1/10/2014	30-Jun-27	01-Oct-14	30-Jun-27
21PM FORT MACQUARIE 50144 "LIC 408999"	21PM	50144	TRANKY HILL ORS STREET	2444	FORT MACQUARIE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
21W52 WAGGA WAGGA M0151 "LIC 491130"	21W5	M0151	2417 WILLIAMS HILL PARK	2650	WAGGA WAGGA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	23/10/1995	30-Jun-27	23-Oct-95	30-Jun-27
212S YASS 50203 "LIC 408728"	212S	50203	PART MOUNT BOWLING TRIG RESERVE	2582	YASS	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
320M BAKA TRIG 51029 "LIC 413360"	320M	51029	PART LINBROOK	2582	BOORHAM	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
42D LINDHOPPE ROAD LINDHOPPE D1701 "LIC 455080"	42D	51071	STANHOPPE RD	2070	LINDHOPPE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
51K ILLAWONG 51390 "LIC 408668"	51K	51390	OLD ILLAWONG HIGHWAY	2294	ILLAWONG	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
61A KAMA TOWN CENTRE 50178 "LIC 455081"	61A	50178	CONN COLLIS & TERLANGE STREETS	2533	KAMA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
812O MERRIBULLA 55807 "LIC 412363"	812O	55807	SAPPHIRE COAST ROAD	2548	MERRIBULLA	NSW	DEPARTMENT OF LANDS	LICENCE	CoUser Access - Ascom	12/09/2002	30-Jun-27	01-Jul-07	30-Jun-27
91C COMBERTON 51018 "LIC 428714"	91C	51018	EROS BAY RD	2551	FALLS CREEK	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - ATN	1/10/2011	30-Jun-27	01-Oct-11	30-Jun-27
912K LAKE CARLEBERRI 51689 "LIC 491389"	912K	51689	HOME WOOD OFF LACHLAN VALLEY WA	2672	LAKE CARLEBERRI	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Telstra	19/10/2004	30-Jun-27	18-Oct-04	30-Jun-27
91M CONDOBOLIN 51390 "LIC 455388"	91M	51390	BRADY STREET	2877	CONDOBOLIN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
917H MOUTHRAN 51132 "LIC 451247"	917H	51132	VIA BURLEY HIGHWAY W/AY	2568	ARLETHAN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
917V NEELI MOUNTAIN 51739 "LIC 412161"	917V	51739	OFF ROAD	2357	COONABARRAN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - BA	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
91W1 WELBONS 51744 "LIC 451297"	91W1	51744	OFF WHEELGONG WIRGINYA ROAD	2871	FORBES	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
91W2 PULLASUBBIAH 51744 "LIC 451297" RENTAL AGREEMENT 1/30/02 "OLD 04/10/2012"	91W2	51744	NEBELI HIGHWAY	2357	COONABARRAN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
91RA VILLA BEACH 51504 "ACMA 205466" "OLD 04/10/2012"	91RA	51504	Mines Road	2448	VILLA BEACH	NSW	FORSTRY CORPORATION OF NEW SO	LICENCE	CoUser Access - Ascom	1/07/2017	30-Jun-27	01-Jun-17	30-Jun-27
913E MT COONABROO 51673 "LIC 412131"	913E	51673	EUCLORRA ROAD	2870	COONABROO	NSW	DEPARTMENT OF PLANNING INDUSTRY	LEASE	CoUser Access - Telstra	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
912K BALKAMAH HILLS 50209 "LIC 408748"	912K	50209	CNR RUSSELL STREET & WINDSOR RD	2153	BALKAMAH HILLS	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
012E FORESTVILLE 58150 "LIC 408648"	012E	58150	MELWOOD AVENUE	2087	FORESTVILLE	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
02F FRESTONVILLE 50128 "LIC 408683"	02F	50128	off Hume Hwy South of Barrima	2577	BERRIMA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
02M KAMA 50152 "LIC 408374"	02M	50152	TRIG RESERVE	2533	KAMA	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
02K NIMMIBULLA 50129 "LIC 408637"	02K	50129	ISLAND VIEW DRIVE	2151	GREEN POND	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
02W1 WATERFALL 50402 "LIC 408685"	02W1	50402	1788 Princess Hwy	2131	WATERFALL	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
02W2 TANDY DUNGY 50153 "LIC 408628"	02W2	50153	TRIG RESERVE	2158	TANDY DUNGY	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
02W3 COVVA 50115 "LIC 408725"	02W3	50115	Old Pacific Hwy Nth of Coonan	2081	COVAN	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
02W4 KULLAN 50131 "LIC 408757"	02W4	50131	OFF WATKINS ROAD	2284	MORISSETT	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	1/07/2007	30-Jun-27	01-Jul-07	30-Jun-27
20WV WINDSOR 50209 "ACMA 202905" "LIC 491389"	20WV	50209	Old Pacific Hwy South of Barrima	2577	BERRIMA	NSW	FORSTRY CORPORATION OF NEW SO	LICENCE	CoUser Access - Ascom	1/04/2013	30-Jun-27	01-Jun-13	30-Jun-27
31T WALLAROO HILL 51019 "ACMA 202905" "LIC 491389"	31T	51019	Lyonspark road	2113	Macquarie park	NSW	PORT STEPHENS CITY COUNCIL	LICENCE	CoUser Access - Ascom	1/01/2018	31-Jul-27	01-Jan-18	31-Dec-37
25B BLAKLAND ATTINGA RD 5203 "LIC 593678"	25B	52039	ATTINGA	2174	BLAKLAND	NSW	DEPARTMENT OF PLANNING INDUSTRY	LICENCE	CoUser Access - Ascom	2/02/2018	01-Feb-28	02-Feb-18	01-Feb-28
2ND NORTH BATHURST 58841	2ND	58841	RUSSELL STREET	2335	BATHURST	NSW	HUNTERS WATER CORPORATION	LICENCE	CoUser Access - Telstra	25/04/2016	10-Mar-28	25-Apr-16	10-Mar-28

The remaining 24 sites in other states are exclusively with government landlords or their managing agents (BGIS Pty Ltd).

Contract Name	BU Numbr	RO Numbr	Street	Postal code	City	Region	Vendor name	Temure type name	Sub contract type name	Contract Start	Term end date	Legal Lease Start Date	Legal Lease end date
FUTURE INACTIVE H 347H TOWOOMBA 80361 "PO 0/211356 TR 400453718001"	347H	80361	CNR POPLAR/HURLEY ST RESERVE/PR	4350	TOWOOMBA	QLD	DEPARTMENT OF RESOURCES	TERMINATION - MAKE INACTI	CoUser Access - Other	1/07/2005	31-Aug-24	28-Sep-04	31-Aug-24
FUTURE INACTIVE H 14F LONGREACH 80287	14FE	80287	WONGSA ST COUNCIL WTR RES	4730	LONGREACH	QLD	LONGREACH REGIONAL COUNCIL	TERMINATION - MAKE INACTI	CoUser Access - Other	1/08/2000	30-Jun-24	01-Jul-00	30-Jun-24
357M MT BENSON 40079 "MOL2 702"	357M	40079	MAIN SOUTH EASTERN ROAD	5274	MOUNT BENSON	SA	COUNCIL FOR ENVIRONMENT AND	LICENCE	CoUser Access - Ascom	1/01/2005	31-Oct-24	01-Jan-05	31-Oct-16
542G WOODCO 8066 "PRESH 0203 0059"	542G	80661	SUNNYS ROAD	4566	TERWANTIN	QLD	ENVIRONMENTAL PROTECTION AGENC	LICENCE	CoUser Access - Ascom	1/08/2002	31-Jul-26	01-Aug-02	30-Jun-10
66E1 ALBANY 2 PO188 C2444 8888849 "MKT EVERY SVRS ON 1ST JUL '88 002724"	66E1	80188	MT CLARENCE/CEPEX DRIVE	6390	ALBANY	WA	DEPT OF LANDS	LICENCE	CoUser Access - Other	1/01/2006	31-Dec-25	01-Jan-06	31-Dec-25
44E CHUNCHILLA 80276 "PO209308 "ASB 13116" "PO 0/209308 TR 4002290"	44E	80276	COLUMBA STREET WATER TOWER	4413	CHUNCHILLA	QLD	DEPARTMENT OF RESOURCES	LICENCE	CoUser Access - Ascom	1/09/1996	31-Aug-26	19-Nov-96	31-Aug-16
44WV WILD HORSE MOUNTAIN PAVED ROOFS "TRMNT OFF 3893 "032724"	44WV	80081	WILD HORSE ROAD	4518	GLASSHOUSE MOUNTAINS	QLD	HEP PLANTATIONS FA	LICENCE	CoUser Access - Ascom	1/11/2007	31-Dec-26	01-Nov-07	31-Dec-26
02TC LUGGERINGS HILL "MOUNT STR													



Out of all 125 Co-User fee contracts or records only 2 are with Landlords that would be considered to represent the private market as demonstrated by the snip below.

Contract Name	BU Numbr	RO Numbr	Street	Postal code	City	Region	Vendor name	Tenure type name	Sub contract type name	Contract Start date	Term end date	Legal Lease Start Dat	Legal Lease end date
2131F MACQUARIE MZ S1086 MOTORWAY VIMIERA RD MARSFIELD	828F	51286	HILLS MOTORWAY OPP END VIMIERA R	2132	MARSFIELD	NSW	HILLS MOTORWAY LTD	NO LEASE ON FILE	CoUser Access - Ascicom	8/03/1999	30-Apr-26	08-Mar-99	30-Apr-17
31. 32XN MARULANA BT5 S5751	828M	51251	CHEPPERD GULLY HUME HIGHWAY	2579	MARULANA	NSW	BELLY STEPHEN JAMES	CONSENT LETTER	CoUser Access - Ascicom	1/01/2002	31-Jan-27	01-Feb-02	31-Jan-27

For ease of reference, I have copied an excerpt from the tenancy schedule into the attached spreadsheet so that you can more closely examine the landlord details of co-user contracts.

As outlined above we do not believe the existence of Sliver leases justifies the charging of co-user fees for in compound co-locations or sharing carriers under joint ventures. Despite this I have undertaken a review of our portfolio in order to dismiss the claim that these types of agreements are commonplace. I have applied filters to the tenure type field column AD in snip below which we have used to classify sliver leases this shows that there are only 20 in our entire tenancy schedule. Further analysis of our property management system that tracks lease negotiations and terminations of tenure indicates that over the last 5 years 11 sliver leases or access agreements have been terminated where they are no longer required as we have rights as a sub tenant of the tower owner.

Contract Name	BU Numbr	RO Numbr	Street	Postal code	City	Region	Vendor name	Tenure type name	Sub contract type name	Contract Start date	Term end date	Legal Lease Start Date	Legal Lease end date
490 4371 ALEXANDRA M0523 (Old #04/10000586)	4371	M0523	HALLS FLAT ROAD	3714	ALEXANDRA	VIC	C A GREATREX AND P A GREATORE	SILVER LEASE	Adjoin Ground - Telstra	1/06/2015	31-May-25	01-Jun-15	31-May-35
755 2449 ASHMORE B0184 *908*SPORT BUSINESS PARK*	4449	B0184	CNR HINDIE STREET & NERANG ROAD	4214	ASHMORE	QLD	The Trustee for Bramley Proper	SILVER LEASE	Adjoin Ground - Ascicom	3/03/1997	14-Sep-25	15-Sep-17	14-Sep-25
908 1282 ELLIEMORA OLD B0816 (Old #04/10000410)	8162	B0816	PACIFIC HIGHWAY	2479	WOCKWOCK	NSW	SINGH SAREET KAUR	SILVER LEASE	Adjoin Ground - Ascicom	1/10/2020	30-Sep-26	01-Oct-20	31-Mar-30
888 3131 SANDGATE S5901 BUNM 3400207 LICK 133866 *OLD 04/10000410*	813X	S5901	PACIFIC HIGHWAY	2304	SANDGATE	NSW	INDARA INFRASTRUCTURE PTY LTD	SILVER LEASE	Adjoin Ground - Telstra	1/11/2020	31-Oct-25	24-Sep-04	31-Oct-30
978 222VC MOUNT VICTORIA S0116 *PATRICK ST 3269/3210	22VC	S0116	PART PORTION 129 PATRICK STREET	2786	MOUNT VICTORIA	NSW	CI AUSTRALIA PTY LIMITED	SILVER LEASE	Adjoin Ground - Ascicom	3/03/1997	11-Dec-25	03-Mar-97	11-Dec-06
105 326N FALCON NORTH P9297 *31 GILBRATH LOOP*	897N	P9297	41 GILBRATH LOOP	6232	FALCON	WA	DSE HILL INVESTMENTS P/L	SILVER LEASE	Adjoin Ground - Telstra	1/02/2012	31-Jan-26	01-Feb-12	31-Jan-31
1236 23H1 BROOKFIELD-HILL M1099	23H1	M1099	GLENLOCK ESTATE GREAT ALPINE ROAD	3678	BROOKFIELD	VIC	HERWOOD D/F	SILVER LEASE	Adjoin Ground - Telstra	6/03/2000	05-May-26	06-May-16	05-May-36
1274 423N FRANKSTON NORTH M1309 14 KLAUER ST SEAFORD *55382	423N	M1309	14 KLAUER ST	3190	SEAFORD	VIC	FINWAVE PTY LTD	SILVER LEASE	Adjoin Ground - Telstra	1/06/2000	31-May-26	01-Jun-16	31-May-36
132 222Z BROOKLYN EAST S9313	222Z	S9313	7-9 B WINDOURNE AVENUE	2100	BROOKLYN	NSW	GLENBIL EPT LTD	SILVER LEASE	Adjoin Ground - Telstra	1/01/2009	30-Jun-26	01-Jan-09	30-Jun-17
1372 32NR KEAURUA S1035 BUNM3400041 LICM80620	32NR	S1035	HUME HWAY AVON	2651	TARCUITA	NSW	INDARA INFRASTRUCTURE PTY LTD	SILVER LEASE	Adjoin Ground - Telstra	1/11/1998	30-Jun-26	01-Nov-98	30-Jun-26
1427 *3 LEASEY B48 BOGANANGAR BB790 DESTOR NO 6817054	848E	BB790	ROUND MOUNTAIN ROAD	2488	BOGANANGAR	NSW	TWEEED SHIRE COUNCIL	SILVER LEASE	Adjoin Ground - Telstra	20/07/2010	19-Jul-26	20-Jul-10	19-Jul-26
1467 02VA BARMAN V1 80079	02VA	80079	4-8 DARTING St	2091	BALAMAIN	NSW	NEW FIB BRIDGES	SILVER LEASE	Adjoin Ground - Ascicom	6/08/1993	07-Aug-26	08-Aug-93	07-Aug-13
1654 31MPT MORUYA TOWN S5903	31MPT	S5903	CNR BROULLEE ROAD & PRINCES HIGHWAY	2537	MORUYA	NSW	BRUCE & REID & ROYDEN O REID	SILVER LEASE	Adjoin Ground - Ascicom	1/01/2005	07-Nov-26	01-Jan-05	07-Nov-26
1749 68NM NORTHAM P0681 *OLD 04/100001159*	68NM	P0681	FDI ROAD	6401	NORTHAM (SHIRE)	WA	INDO PTY LTD	SILVER LEASE	Adjoin Ground - Ascicom	6/01/2018	30-Dec-28	01-Dec-11	30-Dec-41
2005 12K3 RIDGELLE CREEK WEST R0271	12K3	M2071	BARRINGO ROAD	3438	NEW GIBSONE	VIC	KAYVAN PROJECT PTY LTD	SILVER LEASE	Adjoin Ground - NBN	3/06/2010	13-Apr-27	03-Jun-20	13-Apr-27
2126 31PW COONABARRABAN SOUTH S1580 *SUNNY BRAE*	31PW	S1580	AIRPORT ROAD	2387	COONABARRABAN	NSW	M A BARRETT & S M BARRETT	SILVER LEASE	Adjoin Ground - Ascicom	1/10/2004	24-Jun-27	25-Oct-04	24-Jun-27
297 82CV SIMONTON M2607	82CV	M2607	WHITE HILLS ROAD	2364	SMYDNEY	VIC	The Trustee for Rum Bee Prop	SILVER LEASE	Adjoin Ground - NBN	7/05/2021	06-May-28	07-May-21	06-May-33
4361 32N HALT FAN CREEK S1067 *57 DAVIES ROAD*	32N	S1067	PART 57 DAVIES ROAD	2211	PADSTOW	NSW	CARTHANA FINANCE PTY LTD	SILVER LEASE	Adjoin Ground - Ascicom	11/01/2000	10-Oct-29	11-Oct-19	10-Oct-39
5818 32YD LONDONDERRY S1152 BUNM3400268 LICM240645	32YD	S1152	PART LOT 20 STUDLEY ST	2753	LONDONDERRY	NSW	INDARA INFRASTRUCTURE PTY LTD	SILVER LEASE	Adjoin Ground - Telstra	1/03/1999	31-Mar-30	01-Mar-99	30-Jun-16
6162 32HL GARRAWARRA RIDGE S1178 BUNM3400447 LIC9248001	42HL	S1178	888 CEMETARY RD	2508	HELDENBURGH	NSW	INDARA INFRASTRUCTURE PTY LTD	SILVER LEASE	Adjoin Ground - Telstra	1/12/1999	31-Mar-30	01-Dec-99	30-Jun-15

The above analysis demonstrates that in the Optus network portfolio, at least, Co-User fees are neither highly valued or commonplace as siteXcell and the land management agencies claim, with only 2 co-user agreements that could be considered as having landlords from the private market.



The Optus tenancy schedule contains information of a highly confidential nature so clearly we are unable to share a copy of it with IPART or any other party. Should IPART require further information or clarification of information provided above Optus would welcome an opportunity, similar to that apparently afforded to the land management agencies, to present our data at which time we would be happy to demonstrate above methodology and show that there has been no manipulation of data in any manner.

Optus maintains a willingness to work with IPART and other stakeholders to achieve the stated aims of the IPART terms of reference and come up with a pricing regime that is fair equitable and works for all parties, however we strongly believe that the serious issues outlined above with regards to the conflicted and deficient siteXcell report mean that it should be disregarded in IPART's determinations. Should you require clarification or further information on any of the above please get in contact at your convenience.

Regards,



Graham Barber
Director, Property Strategy & Management | Network Deployment & Infrastructure

1 Lyonpark Road, Macquarie Park NSW 2113 Australia



Current Company Extract Plus PPSR Report for EVEREST INFRASTRUCTURE ANZ PTY LTD

Extracted from ASIC database on 14 November 2024 09:58 AM AEST

All PPSR times are listed in Canberra time.

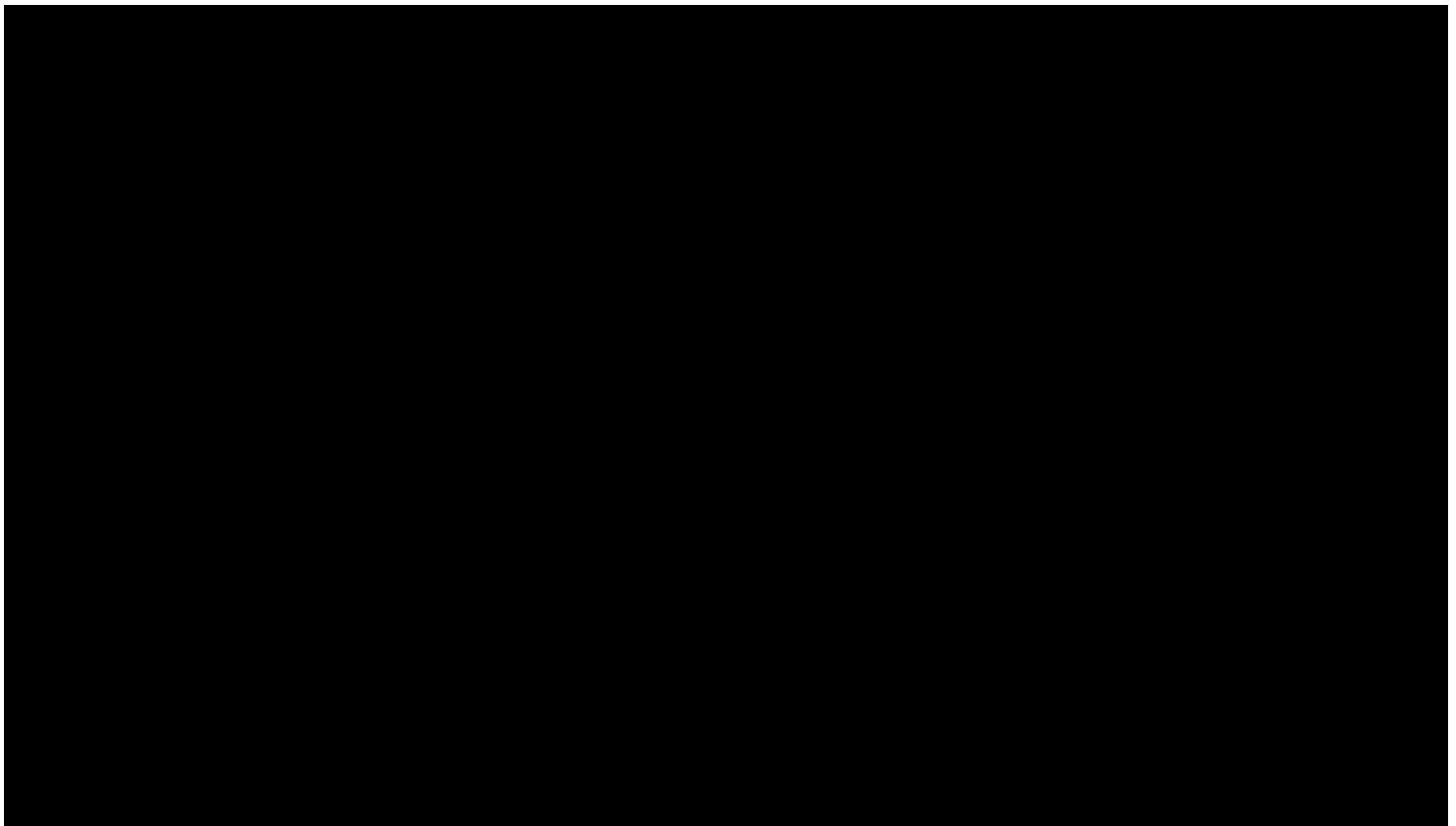
This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

Organisation Details

Name:	EVEREST INFRASTRUCTURE ANZ PTY LTD
A.C.N:	646516761
A.B.N:	15646516761
Status:	Registered
Registered In:	QLD
Registration Date:	10/12/2020
Review Date:	10/12/2024
Ultimate Holding Company	EVEREST ANZ US, LLC
Name Start Date:	10/12/2020
Type:	Australian Proprietary Company
Organisation Number Type:	Australian Company Number
Details Start Date:	10/12/2020
Class:	Limited By Shares
Subclass:	Proprietary Company
Disclosing Entity:	No
Registered charity:	No

Organisation Address

Status	Address Type	Address	Start Date	Doc Number
Current	Registered Office	SUITE 801 203 ROBINA TOWN CENTRE DRIVE ROBINA QLD 4226	03/07/2024	7ECU54168
Current	Principal Place of Business	SUITE 801 203 ROBINA TOWN CENTRE DRIVE ROBINA QLD 4226	26/06/2024	7ECU54168



Share Class	No. Issued	Amount Paid	Amount Unpaid	Doc Number
ORD ORDINARY SHARES	10	\$10.00	\$0.00	5ECJ99132

Note: For each class of shares issued by a proprietary company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Shareholders

Class	No. Held	Beneficially Held	Fully Paid	Shareholder Details	Document Number
ORD	10	Yes	Yes	EVEREST ANZ US, LLC CORPORATION TRUST CENTER 1209 ORANGE STREET WILMINGTON UNITED STATES	5ECJ99132

PPSR Registration Summary

Type	ACN	Name	ABN
Security Interests	2	0	0
Commercial Registrations	2	0	0

Collateral Summary

Type	ACN	Name	ABN
Other goods	1	0	0
All pap with except	1	0	0

PPSR Registrations: By ACN

Registration Number	Start Date	End Date	Collateral	Is PMSI?	Secured Party Name	Is Registration Migrated?
202309070021861	7/09/2023 11:19:57 AM	7/09/2030 11:59:59 PM	Other goods - Other goods	No	1. DOCUMENT SOLUTIONS AUSTRALIA PTY LTD ACN 096914108	No
202312070072498	7/12/2023 06:27:49 PM	No stated end time	All pap with except - All present and after-acquired property - With exceptions		1. Goldman Sachs Specialty Lending Group, L.P.	No

Registrations

REGISTRATION: 202309070021861

Registration Summary

Registration Number:	202309070021861
Change Number:	77571925
Registration Type:	Security interest
Is Registration Transitional?:	No
Is Registration Migrated?:	No
Is Subordinate?:	No
Is Purchase Money Security Interest?:	No
Start Time:	7/09/2023 11:19:57 AM
Change Time:	7/09/2023 11:19:57 AM
End Time:	7/09/2030 11:59:59 PM

Collateral Summary

Collateral Type:	Commercial
Collateral Class:	Other goods
Description:	Digital Office Equipment: Konica Minolta Bizhub C258 S/N: A7R0047004845
Class Description:	Other goods
Is Inventory?:	No
Are Proceeds Claimed?:	Yes
Proceeds Claimed Description:	All present and after acquired property.

Grantors

Grantor Number	Identifier
1	EVEREST INFRASTRUCTURE ANZ PTY LTD ACN 646 516 761

Change History

Number	Type	Date
77571925	Create	7/09/2023 11:19:57 AM

Secured Party Group

Secured Party #	Name	Identifier
1	DOCUMENT SOLUTIONS AUSTRALIA PTY LTD	ACN 096914108

Address for Service**REGISTRATION: 202312070072498****Registration Summary**

Registration Number:	202312070072498
Change Number:	78897829
Registration Type:	Security interest
Is Registration Transitional?:	No
Is Registration Migrated?:	No
Is Subordinate?:	No
Giving of Notice Identifier:	2023-2359
Start Time:	7/12/2023 06:27:49 PM
Change Time:	7/12/2023 06:27:49 PM
End Time:	No stated end time

Collateral Summary

Collateral Type:	Commercial
Collateral Class:	All pap with except
Description:	Collateral is all present and after acquired property except any which the secured party expressly agrees is not included or released. It may include inventory, and may be subject to control. The grantor breaches a security agreement if, without the secured party's consent or agreement, it disposes of collateral (even in the ordinary course of business).
Class Description:	All present and after-acquired property - With exceptions
Are Proceeds Claimed?:	Yes
Proceeds Claimed Description:	All present and after acquired property.

Grantors

Grantor Number	Identifier
1	EVEREST INFRASTRUCTURE ANZ PTY LTD ACN 646 516 761

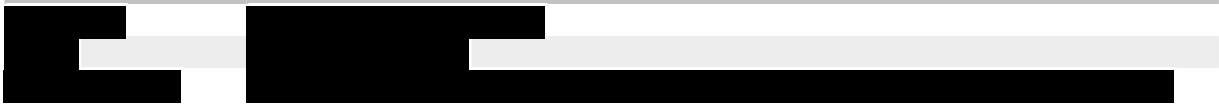
Change History

Number	Type	Date
78897829	Create	7/12/2023 06:27:49 PM

Secured Party Group

Secured Party #	Name	Identifier
1	Goldman Sachs Specialty Lending Group, L.P.	

Address for Service



PPSR Registrations: By Name

No registrations exist.

PPSR Registrations: By ABN

No registrations exist.

Documents

Form Code	Description	# of pages	Received	Processed	Effective	Doc Number
484	484 Change to Company Details 484B Change of Registered Address 484C Change of Principal Place of Business (Address)	2	26/06/2024	26/06/2024	26/06/2024	7ECU54168
484	484 Change to Company Details 484B Change of Registered Address 484C Change of Principal Place of Business (Address)	2	12/03/2021	12/03/2021	12/03/2021	7EBF54490
201	201C Application For Registration as a Proprietary Company	3	10/12/2020	10/12/2020	10/12/2020	5ECJ99132

Current Company Extract Plus PPSR Report for TOTAL SITE SOLUTIONS PTY. LTD.

Extracted from ASIC database on 14 November 2024 10:00 AM AEST

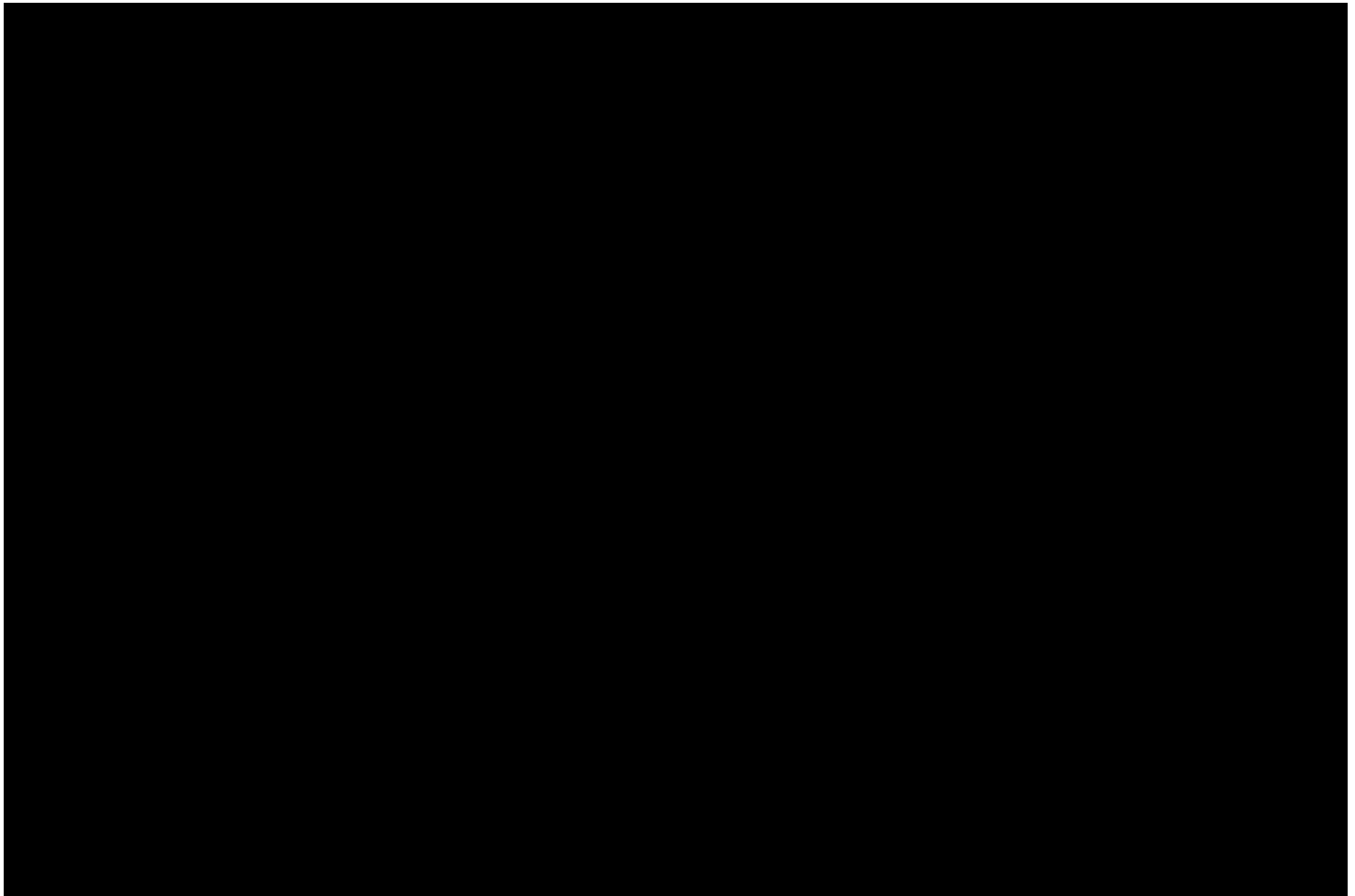
All PPSR times are listed in Canberra time.

This extract contains information derived from the Australian Securities and Investment Commission's (ASIC) database under section 1274A of the Corporations Act 2001. Please advise ASIC of any error or omission which you may identify.

Organisation Details

Name:	TOTAL SITE SOLUTIONS PTY. LTD.
A.C.N:	112332359
A.B.N:	46112332359
Status:	Registered
Registered In:	NSW
Registration Date:	25/12/2004
Review Date:	25/12/2024
Name Start Date:	25/12/2004
Type:	Australian Proprietary Company
Organisation Number Type:	Australian Company Number
Details Start Date:	25/12/2004
Class:	Limited By Shares
Subclass:	Proprietary Company
Disclosing Entity:	No
Registered charity:	No
Document Number:	1E0553542

Organisation Address



Share Class	No. Issued	Amount Paid	Amount Unpaid	Doc Number
A CLASS A SHARES	33	\$33.00	\$0.00	7E8635278
ORD ORDINARY	100	\$100.00	\$0.00	1E0553542

Note: For each class of shares issued by a proprietary company, ASIC records the details of the twenty members of the class (based on shareholdings). The details of any other members holding the same number of shares as the twentieth ranked member will also be recorded by ASIC on the database. Where available, historical records show that a member has ceased to be ranked amongst the twenty members. This may, but does not necessarily mean, that they have ceased to be a member of the company.

Shareholders

Class	No. Held	Beneficially Held	Fully Paid	Shareholder Details	Document Number
A	33	Yes	Yes	EVEREST INFRASTRUCTURE ANZ PTY LTD SUITE 801 203 ROBINA TOWN CENTRE DRIVE ROBINA QLD 4226 ACN: 646516761 ABN: 15646516761	6ECK64106
ORD	100	Yes	Yes	EVEREST INFRASTRUCTURE ANZ PTY LTD SUITE 801 203 ROBINA TOWN CENTRE DRIVE ROBINA QLD 4226 ACN: 646516761 ABN: 15646516761	6ECK64106

PPSR Registration Summary

Type	ACN	Name	ABN
Security Interests	1	0	0
Commercial Registrations	1	0	0

Collateral Summary

Type	ACN	Name	ABN
All pap with except	1	0	0

PPSR Registrations: By ACN

Registration Number	Start Date	End Date	Collateral	Is PMSI?	Secured Party Name	Is Registration Migrated?
202312070073205	7/12/2023 06:30:22 PM	No stated end time	All pap with except - All present and after-acquired property - With exceptions		1. Goldman Sachs Specialty Lending Group, L.P.	No

Registrations

REGISTRATION: 202312070073205

Registration Summary

Registration Number:	202312070073205
Change Number:	78897904
Registration Type:	Security interest
Is Registration Transitional?:	No
Is Registration Migrated?:	No
Is Subordinate?:	No
Giving of Notice Identifier:	2023-2359
Start Time:	7/12/2023 06:30:22 PM
Change Time:	7/12/2023 06:30:22 PM
End Time:	No stated end time

Collateral Summary

Collateral Type:	Commercial
Collateral Class:	All pap with except
Description:	Collateral is all present and after acquired property except any which the secured party expressly agrees is not included or released. It may include inventory, and may be subject to control. The grantor breaches a security agreement if, without the secured party's consent or agreement, it disposes of collateral (even in the ordinary course of business).
Class Description:	All present and after-acquired property - With exceptions

Are Proceeds Claimed?: Yes
Proceeds Claimed Description: All present and after acquired property.

Grantors

Grantor Number	Identifier
1	TOTAL SITE SOLUTIONS PTY. LTD. ACN 112 332 359

Change History

Number	Type	Date
78897904	Create	7/12/2023 06:30:22 PM

Secured Party Group

Secured Party #	Name	Identifier
1	Goldman Sachs Specialty Lending Group, L.P.	

Address for Service

[REDACTED]

PPSR Registrations: By Name

No registrations exist.

PPSR Registrations: By ABN

No registrations exist.

Documents

Form Code	Description	# of pages	Received	Processed	Effective	Doc Number
484	484E Change to Company Details Appointment or Cessation of A Company Officeholder	2	29/10/2024	29/10/2024	29/10/2024	9EAB09857
484	484E Change to Company Details Appointment or Cessation of A Company Officeholder	4	02/06/2023	02/06/2023	02/06/2023	6ECK64133
484	484 Change to Company Details 484B Change of Registered Address 484C Change of Principal Place of Business (Address) 484N Changes to (Members) Share Holdings	4	02/06/2023	02/06/2023	02/06/2023	6ECK64106
484	484 Change to Company Details 484A12 Change Officeholder Name or Address 484A2 Change Member Name or Address	2	14/01/2022	14/01/2022	11/01/2022	2ETY49939
484	484 Change to Company Details 484A12 Change Officeholder Name or Address 484A2 Change Member Name or Address	2	25/05/2020	25/05/2020	22/05/2020	1EJT11054
484	484 Change to Company Details 484A12 Change Officeholder Name or Address 484A2 Change Member Name or Address	2	13/01/2020	13/01/2020	09/01/2020	1EAZ96964
484	484E Change to Company Details Appointment or Cessation of A Company Officeholder	2	13/01/2020	13/01/2020	09/01/2020	1EAZ96963
484	484E Change to Company Details Appointment or Cessation of A Company Officeholder	2	09/10/2019	09/10/2019	09/10/2019	0EVJ10962
484	484A2 Change to Company Details Change Member Name or Address	2	09/01/2019	09/01/2019	07/01/2019	0EFX15607

Form Code	Description	# of pages	Received	Processed	Effective	Doc Number
484	484E Change to Company Details Appointment or Cessation of A Company Officeholder	2	07/01/2019	07/01/2019	21/12/2018	0EFS44215
484	484E Change to Company Details Appointment or Cessation of A Company Officeholder	2	19/06/2018	19/06/2018	14/06/2018	0EAW67297
484	484 Change to Company Details 484A1 2 Change Officeholder Name or Address 484A2 Change Member Name or Address		19/06/2018	19/06/2018	18/06/2018	0EAW67296
484	484 Change to Company Details 484B 2 Change of Registered Address 484C Change of Principal Place of Business (Address)		23/04/2018	23/04/2018	06/04/2018	6E6273356
902	902 Supplementary Document Alters 7E8 635 278	6	01/12/2017	11/12/2017	19/12/2016	030081595
484	484 Change to Company Details 484O 3 Changes to Share Structure 484G Notification of Share Issue 484N Changes to (Members) Share Holdings Altered by 030 081 595		19/12/2016	11/12/2017	19/12/2016	7E8635278
484	484 Change to Company Details 484B 2 Change of Registered Address 484C Change of Principal Place of Business (Address) 484A1 Change Officeholder Name or Address 484A2 Change Member Name or Address		03/01/2014	03/01/2014	03/01/2014	7E5746298
484	484 Change to Company Details 484C 2 Change of Principal Place of Business (Address) 484A1 Change Officeholder Name or Address 484A2 Change Member Name or Address		20/01/2012	20/01/2012	20/01/2012	7E4228927
484	484B Change to Company Details Change of Registered Address	2	08/09/2009	08/09/2009	08/09/2009	7E2416222
201	201C Application For Registration as a Proprietary Company	3	25/12/2004	25/12/2004	25/12/2004	1E0553542