

ENABLE NETWORKS LIMITED

SUBMISSION ON THE SPECIFIED POINTS OF INTERCONNECTION

25 NOVEMBER 2019

1. **Introduction**

- 1.1 This submission is made by Enable Networks Limited in response to the Commerce Commission's (**Commission**) Specified Points of Interconnection paper dated 12 November 2019 (**Paper**).
- 1.2 We respond to questions asked by the Commission in the Paper.

Response to Paper

Question

1 *Do you agree that the UFB initiative POIs are those POIs that were implemented to satisfy the single POI per candidate area requirement under the NIPAs?*

Yes.

2 *Do you agree that the UFB initiative POIs are limited to POIs at layer 2 handover points?*

Yes.

3 *Is the list of UFB initiative POIs and their associated details in Attachment A complete and correct?*

No. Our POIs and associated details are as follows:

	POI ID	NAME	REGION	UFB INITIATIVE GEOGRAPHIC AREA	ADDRESS
1	RIC	RICCARTON	CANTERBURY	GREATER CHRISTCHURCH AREA	40 Whiteleigh Avenue, Addington, Christchurch
2	HRB	HORNBY	CANTERBURY	GREATER CHRISTCHURCH AREA	153 Main South Road, Sockburn, Christchurch

4 *Do you agree with our proposal in paragraph 34 above? That is, for each specified POI, to specify that its related end-user premises, buildings, or other access points are those that are within the POI's associated geographic area/s under the UFB initiative, plus any other end-user premises, buildings, or other access points that are associated with the POI.*

Yes.

5 *Are you aware of any end-user premises, buildings, or other access points for whom fibre fixed line access services are available but that are not, or cannot be, associated with a UFB initiative POI? If so, how should we treat these?*

No.

6 *Do you see any advantages in alternative approach of identifying related end-user premises, buildings, or other access points by reference to SFAs?*

No.

7 *In circumstances where there is a future extension to a fibre network outside of the UFB initiative, rather than specifying a new POI, should we specify that end-user premises,*

Question

buildings, or other access points served by the new fibre network be related to an existing UFB initiative POI?

All premises, buildings and other access points in our coverage area can be serviced by establishing a Fibre Handover Point (ENNI) at either of our two Points of Interconnect (**POI**). Our network has continued to grow through the development of new greenfields subdivisions, and any additional addresses associated with these extensions to our network can be serviced by either of our POIs. It is expected that any future fibre network extensions that are adjacent to our existing network will be serviced by either of our POIs.

Having said this, and to answer the question more specifically, whether a new POI is required or not is a matter of the dimension and location of the growth. It could be possible that a new POI will be required depending on the location and size of growth.

8 *Are there any other details we should provide for each POI?*

No.

9 *Are you aware of any UFB initiative POIs that are not in the list in Attachment A but will exist as at the close of 31 December 2019?*

No.

END