



29 July 2018

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TRUSTPOWER SUBMISSION: CONSIDERATION OF DEREGULATION OF NATIONAL ROAMING

1. This submission is in response to the Commerce Commission's preliminary view on whether to de-regulate national roaming (NR)¹.
2. Trustpower Limited (**Trustpower**) fully supports the Commission's preliminary view that there are still not reasonable grounds to start a Schedule 3 investigation into whether to remove the NR service from Schedule 1 of the Telecommunications Act (**The Act**).
3. There is no evidence to suggest sufficient competition exists in the supply of roaming services to justify the omission of the specified roaming service from Schedule 1.
4. The allocation of 5G spectrum provides a potential opportunity for a new entrant to purchase spectrum. Where this occurs that entrant will almost certainly require a NR arrangement.
5. We consider that the continued presence of NR regulation provides an important backstop to future commercial negotiations.
6. For any questions relating to the material in this submission, please contact me on 021 791 336.

Regards,

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Paul Bacon
Head of Retail Markets

¹ Preliminary View on consideration of deregulation of national roaming dated 9 July 2018.