



Telecommunications Act 2001: Schedule 3 Investigation into amendments to the Roaming and Colocation Services

Submission by CallPlus - 9th March 2007

CallPlus supports the Commission making roaming and co-location designated services and views these two as highly interrelated and should be dealt with side by side.

At this point we have not attempted to respond to all the questions raised in the issues paper – instead we would like to comment on some of the critical issues, in particular: -

1. **Service Specification**

The current definition of national roaming is restricted to second generation cellular services. CallPlus is strongly of the view this is too restrictive and that the definition should be 'technology neutral' & forward looking. Taking a restrictive approach that focuses on legacy network is not in the best long term interest of consumers.

Hybrid devices, wireless technologies such as Wimax (which CallPlus is actively working on), wifi and general technology developments in the "fixed-to-mobile" convergence area promise significant benefits to consumers. Accordingly the commission should use a broad service description which can apply across a range of networks and facilitates inter-network roaming.

Vodafone's undertaking is inadequate in this respect.

2. **Roaming** – CallPlus is of the view that waiting for the establishment of a third national mobile operator is seriously flawed – the window of opportunity has now passed. In practice at this later stage of market maturity it is most likely that competition will occur in regions rather than nationally. In addition to commercial and business considerations which make a third entrant unlikely there are technical reasons why regional competition is likely including:-

- Spectrum – it may be that only regional spectrum is available to an operator.
- PDA's, Laptops – given the lower power of the CPE and the need for more dense 'cell site' coverage it is logical that local and wide area coverage zones will occur rather than ubiquitous coverage.
- Some technologies may be ideal to support rural deployments. Operators deploying into these areas should have access to roaming but would not pass the current criteria.

Callplus supports the view that the national rollout criteria should be removed. Furthermore roaming also needs to include data services not just voice.



3. **Access Seeker Definition** – the current definition is too restrictive. In line with the above comments we support a forward looking approach that consider spectrum limitations as well as facilitating broader inter-network national roaming.
4. **Sunset clause** – There should be no sunset clause in the provision for roaming, especially not if the national coverage requirement is removed.

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Thank you for the opportunity to make this submission.