

30 July 2018

Dr Stephen Gale
Telecommunications Commissioner
Commerce Commission
44 The Terrace
WELLINGTON 6140
By email: regulation.branch@comcom.govt.nz

Dear Stephen,

Commerce Commission Review of the National Roaming Specified Service

2degrees supports the Commerce Commission's preliminary view that there are not reasonable grounds, at this stage, to remove the National Roaming services from the list of non-price regulated 'specified' services in Schedule 1 of the Telecommunications Act.

In 2degrees' experience, the specified national roaming service has been an important backstop to commercial negotiations as the company has continued to invest heavily in nation-wide mobile infrastructure.

Ultimately, this regulation has helped facilitate national mobile infrastructure competition – the 2degrees network has expanded from a 2G network with 47% population coverage at launch in 2009 to a 3G & 4G network with more than 96.5% population coverage today, with further substantial investment planned in competitive products and network deployment.

While 2degrees has yet to recover this significant network investment, the resulting national mobile infrastructure competition has delivered price benefits that have placed New Zealand in the top of the OECD rankings and is ensuring ongoing competitive access to innovative services and new mobile technologies.

2degrees will expand further on its views on mobile competition during the upcoming mobile market review.

Yours sincerely



Mat Bolland
Director of Corporate Affairs & Wholesale

