



Dr Stephen Gale
Telecommunications Commissioner
Commerce Commission
44-52, the Terrace
WELLINGTON

21th February 2014

By email: telco@comcom.govt.nz

Submission on the Commissions process and issues paper for determining a TSLRIC price for UBA under the FPP

CallPlus has already made comments in its february submission on the UCLL process and we note that the Commission has indicated these will be factored into this process.

There appears to be agreement from most parties that the Commission needs to undertake the UBA FPP in parallel with the UCLL FPP and model the full loop.

However as we said in our submission *“as these are the prices that underpin our industry we have concerns that the quality of analysis might be compromised by tight deadlines.”*

CallPlus does not believe that it is possible for the Commission to complete both the UBA & UCLL FPP before December 2014 if an appropriate model is selected and a quality analysis is undertaken. Chorus’ is suggesting that the commission ‘time-box’ the exercise and expediently use a top down approach using their data; this is not an appropriate approach for reasons that will be outlined in the UCLL FPP cross-submissions.

CallPlus’ would strongly disagree with pushing through a UBA determination on the timeframe proposed and do not believe it gives adequate time to undertake the exercise. However, if the Commission decides to do this then it would be even worse if the Commission also sought to complete the UCLL model in the same timeframe.

Given a general agreement that both FPP’s should be completed together CallPlus urges the Commission to allow more time to undertake a thorough exercise.

Thank you for the opportunity to comment, for further information please contact:



A handwritten signature in black ink, appearing to read 'G. Walmsley', with a large, sweeping flourish at the end.

Graham Walmsley
GM Wholesale & Regulatory
CallPlus
Tel: 09 919 6028
Email: Grahamw@Callplus.co.nz