

7th July 2023

Market Regulation Team
Commerce Commission
The Terrace
Wellington

By Email

Re: Submission re preliminary view on the deregulation of national roaming

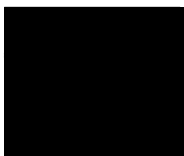
Thank you for the opportunity to provide submissions on the Draft Review on the Mobile National Roaming service as per the requirement of the Commission to decide if there are reasonable grounds to commence an investigation into whether to remove the service from the list of designated services in Schedule 1 of the Telecommunications Act 2001.

We have been consistently supportive of the regulation of this key service to ensure fair competition in the mobile services market especially as a backstop to failed negotiations for market entrants. We note the Commission's comment around the fact that the service as set out in the Act needs to be modernised and support this view. We believe that there are other reasons other than entrance to market that this service might be used such as in cases of weather emergencies which are also outside this review.

We therefore submit this letter of support for the Commission's preliminary decision that there are **not** reasonable grounds to commence a Schedule 3 investigation into whether to omit National Roaming from Schedule 1 of the Act at this time.

We look forward to continuing to work with the Commission on this review.

Yours sincerely



Craig Young
Chief Executive