



# InternetNZ

**Cross Submission on the Commerce Commission's  
Consultation Paper outlining proposed view on  
framework and modelling approach for UBA and  
UCLL**

**Public Version (there is no private version)**

**20<sup>th</sup> August 2014**

1. Thank you for the opportunity to cross-submit.
2. The volume of submissions, and the numerous matters raised in submissions, reinforces our view that the Commission should take adequate time to get this important step right even though that means taking more time. Getting it right is far more important than speed.
3. We note also the concern expressed by WIK and by Network Strategies around the absence of evidence supporting Professor Voselgang's conclusion relating to s 18 issues, including as to migration from copper to UFB.
4. While we strongly support the UFB initiative, and migration of users to fibre, we have always seen it as important that the regulatory approach in this area is carefully evidenced and analysed. Otherwise there can be poor outcomes.
5. We strongly advocated such careful approach in relation to the telecommunication review last year, and we did the same in relation to the update paper on the IPP, when the same sort of problems arose.
6. Now that we are on the more detailed and granular FPP process, the need for sufficiently detailed evidence and analysis is even more necessary.
7. We rely also upon the submissions filed by Wigley & Company.

With many thanks for your consideration,

Yours sincerely



Jordan Carter  
Chief Executive  
**InternetNZ**

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