

PUBLIC VERSION

10 July 2023

Toni Shuker
Manager, Regulatory Rules & Compliance, Telecommunications
Commerce Commission
55 Shortland Street
PO Box 105-222
AUCKLAND 1143

By email: market.regulation@comcom.govt.nz

Dear Toni Shuker,

Commerce Commission Review of the National Roaming Specified Service

Thank you for the opportunity to comment on the Commerce Commission's *Review of National Roaming, Preliminary view on the deregulation of National Roaming, 12 June 2023* (the **2023 National Roaming Review**).

2degrees supports the Commerce Commission's preliminary view not to commence a Schedule 3 investigation into whether to omit the National Roaming service from the list of non-price regulated 'specified' services in Schedule 1 of the Telecommunications Act.

The specified national roaming service has been an important backstop to 2degrees commercial negotiations as it has continued to invest heavily in nationwide mobile infrastructure rollout.

While 2degrees does not currently have a national roaming agreement with any of its competitors, it does have an infrastructure 'MoRAN'¹ sharing arrangement with One NZ, which targets coverage to what were the remaining areas of roaming coverage. The national roaming specified service is an important alternative to this sharing arrangement [C-I-C
1]

2degrees agree that the current costs of maintaining the existing, specified-only, service are limited. This recognises that changes to the existing service are beyond the scope of this review and 2degrees are not seeking amendments to this service at this time.

Yours sincerely

Sara Lipanovic
Head of Regulatory

¹ Multi Operator Radio Access Network. This shares the One NZ RAN but utilises 2degrees' spectrum.

