

15 July 2014

Jessica Bevin  
Commerce Commission  
Wellington

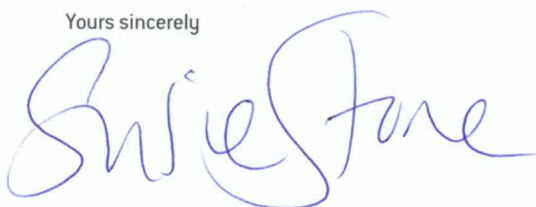
By email c/o telco@comcom.govt.nz

Dear Jessica

**Assessing Chorus' new UBA variant – Boost HD and Boost VDSL**

1. Kordia thanks the Commission for the opportunity to submit on the Issues Paper.
2. Kordia encourage Chorus in its initiatives to introduce new and innovative commercial products that address the market requirements.
3. Kordia will consume the new commercial products for UFB offered by Chorus as they better suit our customers' requirements.
4. However in bringing new commercial offerings Chorus must be truly innovative and be creating new services. They cannot be creating the illusion of new services.
5. In our view what Chorus is seeking to do with the proposed two new UBA Variants is not creating new and innovative services.
6. We consider that the two new variants do fall within the existing UBA Service Description outlined in Schedule 1 of the UBA STD.
7. The two new variants are not complements but substitutes for the regulated service. Chorus is clearly seeking to drive substitution of the regulated services by the proposed new commercial services.
8. Chorus' attempts to categorise the commercial services as materially different to the regulated services are specious.
9. We further do not consider that Chorus can under the Service Descriptions amend the regulated services in the way that it proposes.
10. In implementing bandwidth management Chorus is clearly attempting to degrade the regulated services to "encourage" RSPs to move to the more costly platform, thereby increasing the revenue per line for Chorus.
11. This is not service innovation, this is an attempt by Chorus via a thin veil of technical adjustments to game the system to limit its regulatory service and compliance obligations.
12. We have had the opportunity to read the submission from Michael Wigley for Internet NZ and we support that.

Yours sincerely



Susie Stone

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