

From: Peter Gregory
Sent: Friday, 18 July 2014 4:55 p.m.
To: telco; Jessica Bevin
Subject: Trustpower feedback on Chorus Commercial UBA

Hi Jessica

Please find enclosed brief feedback on the proposed Chorus Commercial UBA.

Please can you also note that Trustpower has only had 6 business days to prepare for this post Chorus presentation on July 10th 2014. This was a significant modification to the notification in May 2014 from Chorus regarding the Commercial UBA services.

1. Thank you for the opportunity to submit feedback in response to Chorus Commercial Offer's with reference to the Commissions Issues Paper: Addressing Chorus' new UBA variants (Boost HD & Boost VDSL). This submission is made by Trustpower, who provides Electricity, Gas, Phone and Internet Services. Trustpower has over 30,000 telecommunications customers consuming copper PSTN telephony and mostly Regulated UBA (BUBA & EUBA) with approximately 4,000 Ultra Fast Broadband connections.
2. The Chorus Commercial UBA variants not only presents new offers to the market but significantly changes the current regulated UBA variants. The proposed changes to the Regulated UBA variants should be only conducted as a review of the UBA STD (STD) rather than driven by Commercial UBA offers.
3. The proposed changes to the Regulated UBA variants reduces the segment intended for the service and would favour uptake of a Commercial UBA variant driving significant technical and operational cost to the retailer. This is over and above the uplift in ongoing monthly costs compared to Regulated UBA variants.
4. The proposed traffic management policy of 250kbps would significant impact our customers. Chorus are constraining a regulated products to drive uptake of commercial products, essentially creating a problem and providing a solution (Commercial UBA).
5. To clarify, the Commercial UBA variants offers opportunity, which should be the intention however, it seems the fundamental intention of the proposal is to change Regulated UBA. Trustpower supports the differentiation with new offers but does not support this with a Regulated UBA rider.
6. The Chorus proposal is a significant change in both the market & Regulated UBA variants. With the introduction of Chorus' Commercial UBA variants this renders a Regulated UBA variant unfit for purpose and goes against the intention of the Regulatory Regime of UBA.

Peter Gregory
Business Manager - Telecommunications

Trustpower