



**Vodafone New Zealand Limited**  
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Tricia Jennings  
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**BY EMAIL ONLY**

Dear Tricia,

**RE: DEADLINE FOR SUBMISSIONS ON UBA AND UCLL FPP DRAFT DETERMINATIONS  
– REQUEST FOR EXTENSION TO DEADLINE FOR CROSS-SUBMISSIONS**

We and our expert advisers have reviewed the submissions and additional material made available by the Commission on Tuesday 24 February. We are now working to provide a cross-submission that properly addresses the substantial volume of new information on which comment is sought.

The deadline for providing cross-submissions is Friday 20 March. Vodafone requires an extension to this deadline. We understand that the Commission will be reluctant to alter its existing administrative timetable but we are unfortunately unable to prepare a cross-submission by the existing deadline.

Our reasons for seeking an extension are as follows:

- Our expert advisers require further time to consider submissions regarding geospatial modelling. Information on the geospatial modelling exercise undertaken by TERA (as a precursor step to the TSLRIC modelling) was not made available during the Commission's consultation on the Draft Determinations. Chorus has made material submissions on this exercise, drawing on its own

information about the location of its customers. Chorus' commentary on TERA's geospatial modelling is **new** information on a matter that is highly relevant to the Commission's determination of UCLL and UBA prices, and we need sufficient time to consider this information and respond to it. Chorus' submissions provide clues on the modelling that has been undertaken by TERA, which is itself a critical step in the Commission's analysis on which we wish to fully engage. To do so requires detailed and time consuming analysis that cannot be completed by 20 March. (Note: This issue would not have arisen if Chorus' customer location information had been made available to parties on 2 December, thereby allowing it to be accounted for in our primary submissions. Vodafone consistently engaged with the Commission on the issue of geospatial information following publication of the Draft Determinations, and sought geographic location information from Chorus (on terms specified in the s100 orders) as early as 27 November 2014.)

- Parties' submissions were not published until Tuesday 24 February. There was a four day 'lag' after the submissions were filed before they were disclosed to other parties. We understand the reasons for this delay but it has nevertheless resulted in four days being lost from the total 28 day period given for reviewing a substantial volume of new material and preparing responses.
- Chorus' address geocode data file was not made available until Thursday 26 February, some six days after it was provided to the Commission. Again, while there may be good reasons for this delay, it does result in all parties having much less time to incorporate consideration of this data into cross-submissions than is assumed by the existing deadline. A six day period is very significant in the context of a deadline for cross-submissions that allows parties a maximum of 28 days to review and comment on lengthy and complex submissions that include new material.

In light of the above, we request that the Commission extend the deadline for cross-submissions by two weeks to 3 April (or the working day immediately preceding it).

Please contact me if you have any questions regarding this letter.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'T. Thursby', with a stylized flourish extending from the end.

**Tom Thursby**  
**Lead Counsel – Competition and Regulatory**  
**Vodafone New Zealand Limited**