

2 September 2016

Dr Stephen Gale
Telecommunications Commissioner
PO Box 2351
WELLINGTON 6140



By email: Stephen.Gale@comcom.govt.nz

Dear Stephen

**Initiating Determination Process for designated multinetwork service determination
for Number Portability**

Thank you for your letter dated 25 August 2016, which outlines the process the Commission intends to follow to renew the Designated Multinetwork Service Determination (“Determination”).

The New Zealand Telecommunications Forum (TCF) is the telecommunications sector’s industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. The TCF enables the industry to work together and to discuss issues and topics collaboratively, to reach acceptable solutions that can be developed and implemented successfully. Its members represent 95% of the sector.

The TCF has worked with the Parties to the Determination who are members of the TCF to prepare this response, and they support this submission. These parties are Compass Communication¹, NOW New Zealand Limited, Spark New Zealand Limited, Symbio Wholesale NZ Limited, Two Degrees New Zealand, Vibe Communications Limited, Vodafone New Zealand (includes TelstraClear, ihug and Vodafone Next Generation Services), Vocus New Zealand Limited (includes 2Talk, CallPlus, Orcon and M2) and Voyager Internet.

Recognising that the current Determination is due to expire on 19 December 2016, we agree that there are reasonable grounds for initiating the process for making a Determination.

We support the rationale as outlined by the Commission in its 25 August letter. It is particularly important that any regulatory uncertainty regarding the regulated status of number portability is removed to ensure consistency in the provision of the service and that the principles regarding the cost allocation mechanism are upheld.

¹ Note that Compass is no longer a TCF member.

We thank the Commission for the opportunity to comment on this matter and look forward to receiving the Commission's decision.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Thorn', followed by a horizontal line.

Geoff Thorn
Chief Executive Officer
New Zealand Telecommunications Forum (TCF)