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Filomena Antunes  
Telecommunications Branch  
Commerce Commission  
Wellington

<By email>

Dear Filomena

### **Review of the MTAS STD monitoring requirements**

Thank you for the opportunity to comment on the review of MTAS STD monitoring requirements.

Vodafone supports the proposed approach to delete the existing requirements to provide monthly information under the MTAS STD.

As the Commission identifies, the mobile market has changed significantly since the determination was originally made in 2011. The existing monitoring obligations no longer provide the most appropriate information to assess competition in mobile communications markets. These outdated requirements impose significant cost for Vodafone on a monthly basis for little practical or demonstrable benefit.

Vodafone agrees that the Commission's existing powers and functions under section 9A, together with its section 98 powers, allow it to monitor competition within mobile telecommunications markets effectively.

We appreciate that the Commission has also worked closely with the industry to streamline and refine the specific metrics under its current data collection under section 9A. This ensures that the information collected effectively informs the Commission's analysis of competition within telecommunications markets, while minimising the collection costs for telecommunications providers.

Should you have any questions, please do not hesitate to contact me, at [chris.abbott@vodafone.com](mailto:chris.abbott@vodafone.com).

Yours sincerely

Chris Abbott  
**Head of Public Policy & Government Relations**