



PUBLIC VERSION

Dr Stephen Gale
Telecommunications Commissioner
Commerce Commission
PO Box 2351
Wellington 6140
WELLINGTON

Dear Stephen

Submissions on Review of Schedule 1 Selected Services – Additional Information

Thank you for the opportunity to provide further comments following the receipt of Spark's 20 June letter.

Our position remains that the resale and local access/calling markets do not warrant further investigation at this time.

As set out in our initial response we do not consider that the Baseband IP Product provides sufficient competitive constraint at present. Baseband IP is not universally available, with 3% of consumers not planned for an upgrade to Baseband IP capability in future.

[Commercial-In-Confidence]

This further supports our view set out previously that these wholesale alternatives are not an effective competitive substitute at present and that it is too soon to consider omitting relevant services from the Telecommunications Act. A regulatory backstop would prevent against such concerns within the industry over the short term.

Please let us know if you have any queries.

Yours sincerely

Sara Lipanovic
Regulatory Policy Manager