

27th January 2015

Simon Thomson
Manager
Regulation Branch - Telecommunications
Commerce Commission

By email only: telco@comcom.govt.nz

Dear Simon,

CONSULTATION PAPER ON possible s30R review of the UBA General terms & Service Description

Thank you for the opportunity to comment on the paper, CallPlus has input to and fully support the Wigley & Company submission on this issue. We fully support a review at this time by the Commission following the Boost process which highlighted problems with the current STD.

At the highest level there are two areas that we would like to highlight and are outlined more fully in the Wigley submission:

1. The UBA service needs to be 'future proofed' to avoid the regulated service being 'side-lined' to a niche service. The proposed commercial Boost ADSL & VDSL services would have done just that. A FS/FS service which incorporates new DSL variants (which we believe the current STD does incorporate) is essential. In addition this needs expand to keep up with demands to ensure the services isn't degraded.

If this can be achieved then the opportunity for 'gaming' such as Boost is significantly diminished.

2. Non-recurring fees are now a very material part of the UBA & UCLL service. RSP's should have the necessary tools and transparency of information to
 - a. be able to order the correct services, avoid wasted time and cost by ordering incorrect or services that are not required
 - b. reconcile bills and validate and charges. Unfortunately Chorus incentives differ from customers and RSP's and at this time CallPlus and other RSPs have significant concerns with Chorus records and processes which drive costs into RSPs.

We look forward to providing further information on this area as the review progresses.

Please do not hesitate to contact me for additional information.

Yours sincerely,



Graham Walmsley

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