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## **Cross-submission on consultation paper on setting prices for the service transaction charges for UBA and UCLL services**

Vodafone welcomes the opportunity to provide cross-submissions on the Commission's consultation paper on setting prices for the service transaction charges for UBA and UCLL services.

The impact of transaction charges is significant. At Chorus' 1 October industry briefing session on Boost, a weighted average installation charge for UBA of approximately \$87 per connection was forecast (taking into account Chorus' expected mix of record change, cabinet/exchange visit, and site visit installations), based on the existing IPP transaction charges for UBA.

On a simple calculation (not accounting for cost of capital), this amounts to a cost of \$2.90/month for UBA customers, across the industry-accepted customer lifetime period of 30 months (or more than 8% of the monthly UBA price of \$34.44 determined in the IPP). As such, a robust approach is essential to setting an accurate TSLRIC price for the designated access service.

We also endorse the view set out in the original submissions from Spark and CallPlus that the Commission should take a broad approach to assessing transaction charges and is not restricted to those specific charges which were set as part of the IPP process.

Finally, we refer the Commission to the attached expert report prepared by WIK-Consult on behalf of Vodafone and Spark.

Yours sincerely

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