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**Submission on the Draft Determination for the Telecommunications
Development Levy for 2012/2013**

1. Vector Limited ("Vector") welcomes the opportunity to make this submission on the Commerce Commission's ("the Commission") *Draft liability allocation determination for the Telecommunications Development Levy for 1 July 2012 to 30 June 2013*, dated 29 October 2013.
2. This submission focuses on 1) the treatment of local fibre companies ("LFCs") as Telecommunications Development Levy ("TDL") liable parties, and 2) reporting consistency.
3. No part of this submission is confidential and Vector is happy for it to be made publicly available.
4. Vector's contact person for this submission is:

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Inclusion of LFCs as liable persons

5. Vector supports the Commission's treatment of some groups of qualifying liable persons as a single entity for the purposes of the TDL liability allocation determination for 2012/2013.
6. In the case of the Local Fibre Companies, because they are "connected by means of a significant level of shareholding" by the Crown, they should be collectively considered (together with other "Crown companies") as a single qualifying liable person.

7. This requirement is clear under section 79 of the Telecommunications Act 2001.

Reporting consistency

8. Vector notes that in the table under paragraph X3, column 2 (Qualified revenue), some of the amounts are rounded off to the nearest thousand dollars while other amounts are not. In comparison, the final TDL liability allocation determination for the previous period (2011/2012) rounded off all the amounts under the same column.
9. Vector suggests that the Commission adopt a single approach in reporting amounts and other data, regardless of which approach it would prefer to use. This would ensure reporting consistency and data integrity across various TDL determinations.

Yours sincerely

A handwritten signature in blue ink that reads "R. B. Girdwood".

Bruce Girdwood
Group Manager Regulatory Affairs