

24 September 2010

Mr John Hamill  
Manager, Airports and Input Methodologies  
Regulation Branch  
Commerce Commission  
PO Box 2351  
WELLINGTON

**Re: Comments on Definitions by NZAA**

Dear John

Please find attached comments by BARNZ on the additional changes proposed by NZAA to the definitions contained within the Specified Airport Services Information Disclosure Draft Determination.

It should be noted that NZAA have provided comments on the Commission's decisions in both their August Cross Submission to the BARNZ submission on the Draft Determination and in their document provided to the Commission on 17 September. However, the earlier changes proposed by NZAA have not been identified in the most recent NZAA document. Instead those earlier suggested additions, deletions and changes made by NZAA have been accepted during the current editing process by NZAA. This means that the starting point from which NZAA have tracked their most recent suggested additions, deletions and changes is not the original Commerce Commission schedule of definitions, but rather was the NZAA altered schedule of definitions from their August Cross Submission. This has made the process of commenting on the most recent NZAA changes rather difficult.

BARNZ has endeavoured to identify where it considers there are material changes made by NZAA in their earlier submission which have not been shown as changes in the most recent NZAA document, but it is entirely possible that untracked changes have not been identified. We ask that the Commission does not assume that BARNZ agrees with a previous (now untracked) change by NZAA simply because BARNZ has not commented upon it in this latest submission.

If any of the Commission staff have any queries or comments on the matters raised by BARNZ in relation to the mark up of the definitions please do not hesitate to contact the BARNZ office.

Yours sincerely



John Beckett  
Executive Director