

Wednesday July 23, 2008

Neville Lord
Commerce Commission
P O Box 2351
Wellington



Regarding: Accounting Separation of Telecom

Dear Neville

ISPANZ, the Internet Service Providers Association of New Zealand, expresses its support for the InternetNZ Submission to the Commerce Commission on the Draft Principles and Regulatory Reporting Requirements for the Accounting Separation of Telecom.

The robustness of the Accounting Separation is crucial if the end goals of Operational Separation are to be achieved.

In particular ISPANZ reinforces the point that current cost accounting should be introduced quickly and that Telecom should include “first order” information underpinning regulatory pricing.

This would enable Access Seekers to better monitor whether wholesale prices are appropriate and consider any regulatory or other actions that may be necessary.

ISPANZ also reinforces the points made in respect to bundles and price squeezes. These can be difficult and time consuming issues to deal with after the fact and the preventative impact from appropriate disclosure of information requirements would be welcomed.

Regards

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ISPANZ

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