

Subject: Support for Internet NZ's submission

This is a submission by Kordia and Orcon. We have read the InternetNZ submission dated 23 March. We add our support to that submission.

Price squeeze and horizontal bundling issues are a major challenge for the industry and ultimately for consumer welfare. The information disclosure regime presents an opportunity to deal with these issues early on. We would strongly support the Commission undertaking a workstream to consider adding a price squeeze/bundling information disclosure process. We believe that one of the things that holds back stakeholders including the Commission from taking action is the lack of adequate information. Requiring disclosure (for example, imputation test disclosure) will also make it more likely that there will be no anti-competitive bundling or price squeeze in the first place (even if disclosure is limited solely to the Commission). Such transparency could be highly effective.

Regs

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