

File No: P/002/TP014/001

16 September 2008

Sharoon Abas
Commerce Commission
Level 6, Vector House
44-52 The Terrace
WELLINGTON

Dear Sharoon

**SUBMISSION ON THE COMMERCE COMMISSION DRAFT REPORT ON
NUMBERING MANAGEMENT IN NEW ZEALAND**

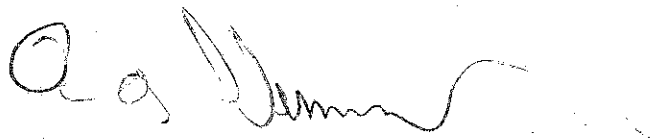
The Ministry appreciates the opportunity to comment on the Commerce Commission draft report on numbering management in New Zealand. The draft report identifies international best practice for efficient number management, and signals that there are aspects of New Zealand practice that may require review.

The Ministry suggests that consideration be given to establishing a cross sector working party to look at network numbering governance and administration. This should cover telephone numbering and IP numbering to recognise the increasing interdependence of the two numbering schemes from the potential introduction of ENUM.

This work would build upon the Commission's report and the report of the joint NAD TCF working party on the numbering administration framework. The working party could comprise stakeholders including representatives from the Ministry, Commission, industry, InternetNZ, and other interested parties.

In our submission on the joint NAD TCF working party report we noted that the convergence of network numbering needed to be recognised in any reform of number administration, and that the new arrangements should encompass both diallable and non-diallable numbers. The Ministry currently administers some non-diallable network numbers and considers it would be more efficient if these numbers were managed together with diallable numbers.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Reg Hammond', with a long, sweeping horizontal stroke at the end.

Reg Hammond
Manager, ICT Regulatory Group
Energy and Communications Branch

cc Ralph Chivers, TCF (by email)