



19 September 2008

Ross Patterson
Telecommunications Commissioner
PO Box 2351
Wellington

Via email

Dear Ross

Draft Report on Numbering Management in New Zealand

This submission is made by the Telecommunications Carriers' Forum (TCF) with the endorsement of the NAD/TCF Working Party whose members include a number of parties to the Number Administration Deed (NAD).

The TCF agrees that the time has come to take a fresh look at an approach that will best meet New Zealand's needs going forward.

We acknowledge that the Commerce Commission's (Commission) Draft Report on Numbering Management in New Zealand (Draft Report) identifies a number of characteristics of a "world's best practice" numbering regime, some of which are not evident in the current New Zealand approach. These issues go beyond simple matters of governance which the TCF's work has been focused on to date.

The TCF believes that the issues the Commission has raised do not result in an automatic conclusion that a continuing role for the industry is inappropriate. However, we also recognise that formal regulatory oversight of some kind is necessary to bring New Zealand into line with best practice. One of the key issues, therefore, is to determine the appropriate balance between the role of the Commission and the role of the industry.

Rather than commenting any further on specific issues that the Commission's Draft Report raises, the TCF proposes that a joint project team be formed with the primary purpose of re-designing the New Zealand numbering regime to reflect world best practice. We expect that the project team would use the Commission's Draft Report and the NAD/TCF Working Party's draft report on Numbering Administration (issued for public consultation in July) as the basis for defining the high-level issues and therefore the project's work plan.

We propose that the project team should comprise representatives of the TCF, NAD, Commission, Ministry of Economic Development (MED) and any other

parties we agree would add value and expertise to the discussion. The TCF is prepared to provide all necessary administrative support for this project.

The NAD has advised us that they support this joint approach. If the Commission also agrees with our suggested approach, I propose that we commence work as soon as practical.

Yours sincerely



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cc Reg Hammond, MED
Richard Rowley, NAD Independent Chair