



18<sup>th</sup> September 2007

Commerce Commission  
44-52, the Terrace  
WELLINGTON

By email: thomas.forster@comcom.govt.nz

## **Telecommunications Act 2001: Schedule 3 Investigation into Amendments to the Roaming and Collocation Services**

### **Brief Cross Submission by CallPlus**

Public Version (there is no confidential version)

#### **Introduction**

CallPlus thanks the Commerce Commission for the opportunity to make this cross submission on the draft report. Further to its submission of the 31<sup>st</sup> of August CallPlus would like to make the following brief comments.

#### **1. Call Handover**

CallPlus strongly recommends that call handover services should be regulated by way of an STD and should not be treated as a separate agreement for the reasons outlined in our earlier submission.

CallPlus notes that this view is also supported by Kordia in its submission (Para 4.1 – 4.4).

#### **2. Co-location**

CallPlus notes that Woosh's and New Zealand Communication's submission support CallPlus' the view that co-location should be a designated service.

Furthermore CallPlus notes and supports Kordia's view in their cross-submission on co-location that co-location should become a designated service subject to price and non-price terms.

#### **3. Roaming**

CallPlus' views are unchanged from our initial submission and we note the support of others, including Woosh, NZ Communications and Kordia, to the view that roaming should be technology neutral and forward looking to include WiFi, WiMAX and other technologies.



We support the comments made by Kordia in their 31<sup>st</sup> August submission (Para 9.1 to 9.3). In particular the potential for restrictive practices such as disabling of chips or software for WiFi or WiMAX and refusing to import or include mobile handsets that enable the technology of competitors.

On considering submissions CallPlus is of the view that roaming is regulated to facilitate new competitors entering the market and becoming established. As such both Telecom and Vodafone should be excluded as access seekers under the roaming service.

For further information from CallPlus please contact:

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Yours faithfully,

A handwritten signature in black ink, appearing to read 'G. Walmsley', with a large, sweeping flourish at the end.

Graham Walmsley  
General Manager – Wholesale & Regulatory