



Commerce Commission

Review of Designated and Specified Services under the Telecommunications Act 2001

30th September 2005

Comment from CallPlus





Comments on preliminary view on decision to investigate and procedural matters with respect to the review of Designated and Specified services

CallPlus welcomes the opportunity to comment on the upcoming review of the designated services and supports the commissioners preliminary views outlined in his paper.

1. Designated Services

We support the view that there are reasonable grounds to investigate extension of the identified designated services. Unfortunately we have seen little or no improvement in the competitive landscape since 2001.

We are pleased to see the inclusion of retail bundles. Our interpretation is that this includes both Residential and Business Bundles and that it will cover bundles that include “services offered by means of Telecom’s FTN” as well as other retail services (not necessarily delivered via Telecom’s FTN).

In our view the area of bundling has been used by Telecom to game the system, “safe harboring” price points and services as well as creating unfair competitive advantages in other non-price aspects of services. The introduction of Telecom’s NGN and the evolution to converged “IP” based services will make this area even more critical.

2. Amendments to services

CallPlus believes that there is a definite need to amend the services – in particular the retail services group mentioned in point 25.

We are supportive of an approach that allows the two processes – the extension review and the amendment to services – to run in parallel and disagree with Vodafone’s view (footnote 21).

We provided additional details relevant to the above points in our comments on the review of designated and specified services submitted on the 19th August 2005. CallPlus welcomes the opportunity to input further on this issue.

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CallPlus