

14 July 2006

Cross Submission to

TelstraClear Submission in response to the Commerce Commission's "Schedule 3 investigation into the extension of regulation of designated and specified services - Draft Report" dated 30 May 2006

Section 3.5.2 Australian approach

Econet believes in the Australian approach. Econet would like to see the Commerce Commission open an office in Australia and Brussels to benefit from its knowledge.

Section 4 The state of competition and the effect of regulation

Econet's view is that there must be four mobile operators and there is no competition in NZ.

Section 5.4 Co-Location on Cellular Mobile Transmission Sites

Econet believes that the Commissioner should take targets for co-location at 70% plus of all TCNZ and Vodafone sites.

Econet believes the TCF is a failure and a national disgrace

Section 5.5 National Roaming

79. Econet believes that the Europeans have made technology decisions for Kiwi consumers. There are 2 billion GSM users and 200 million CDMA. Only an idiot would build a CDMA network to compete with GSM.
83. Econet agrees with this statement.
84. Econet agrees with this statement.
86. NZ needs to get a grip on technology decisions made for it by mass market producers.