



11 August 2005

Kate Saunders
Commerce Commission
PO Box 2351
Wellington

Dear Kate

Review of Designated and Specified Services – Procedural Matters

I am writing in response to the Commission's paper of 4 August 2005, seeking comment on procedural matters relating to the forthcoming review of designated and specified services under the Telecommunications Act.

Generally speaking ihug is supportive of the approach outlined in that paper. However I wish to make the following specific comments:

1. Ihug's view is that all services which are currently designated or specified should remain so following the review.
2. The Commission has proposed 4 groups of services for the purposes of the review. Ihug is comfortable with the proposal, but would not like to see the number of groups expanded, as any expansion is likely to impose an additional administrative burden (and therefore additional costs) on ihug.
3. If the Commission considers it necessary to prioritise its investigation, then the order in which the groups appear in paragraph 6 of the report is in ihug's view the appropriate order of priority.
4. The Commission has sought preliminary views on which services might require amendment. Ihug's view is that the UBS service description is, for reasons previously advised to the Commission, hopelessly inadequate.

Please contact me if you would like to discuss any aspect of this submission further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'David Diprose', written over a white rectangular box.

David Diprose
General manager – networks
ihug Limited