

Lies, damned lies and statistics Vodafone Submissions

- Co-location isn't working
- Vodafone doesn't want to agree a fair roaming deal
- The Commerce Commission must extend these regulated services

Vodafone Submission

- *“We have approximately 100 sites co-located out of a total of around 1,200”*
- *“In fact we co-locate 40 sites with organisations other than Telecom”*

ST Name	ST Address Line 1	ST Address Line 2	ST Address Line 3	ST Address Line 4
Amberly/Balcairn	No.18	Main Road		Amberly
Big Hill		Nimrod Road	Peebles	North Otago
Canterbury/Oxford		Bay Road		Oxford
Clevedon		McNicol Road	RD 2	Clevedon
Cromwell		Felton Road	Bannockburn	Cromwell
Dannevirke		Rule Road		Dannevirke
Dashwood		Weld Pass		Dashwood
Dinsdale		Newcastle Road	Dinsdale	HAMILTON
Hahei	120	Lees Road	Hahei	Coromandel
Kaitaia		Korimako Lane		Kaitaia
Kaitoke		Waterworks Road		Kaitoke
Kamo North		Parakiore Road		Whangarei
Kawakawa East		Whangae Road		Kawakawa
Manakau Straits		Waitohu Valley Rd		Otaki
Mangakino	399	Kahu Rd		Whakamaru
Mangawhai		Cove Road		Mangawhai
Maroanui		S H 1	Maroanui Hill	Maroanui
Martinborough		Riverside Road		Martinborough
Meremere Straights (2)	209	Whangamarino Road		Te Kauwhata
Murchison		Lonford		Murchison
Muriwai (Perm)		Grass Track Road		Muriwai
New Plymouth Outer		Blagdon Hill		New Plymouth

ST Name	ST Address Line 1	ST Address Line 2	ST Address Line 3	ST Address Line 4
Ngongotaha		Paradise Valley Road	Ngongotaha	Rotorua
Paekakariki		State Highway 1	Paekakariki	Wellington
Paeroa		Aorangi Road		Paeroa
Pahiatua		West Road		Mangatainoka
Parnassus		SHW1		Parnassus
Pokeno		Cole Road		Pokeno
Portland		Portland Quay Road	Portland	Whangarei
Pukekohe Outer	117	Masters Road		Waiuku
Pukepoto		Gee Road	Pukepoto	Rotorua
Raglan (Permanent)		Te Hutewai Road	RD 2	RAGLAN
Seddon		Marama Road		Seddon
Taumarunui North	State Highway 40	Ohura rd	Pukepoto	
Treble Cone (Temp)			Roys Peninsula	West Wanaka
Te Kauwhata		Halls Rd	R D 2	Te Kauwhata
Tutukaka		Western side of Matapuri Rd		Tutukaka
Waiouru		State Highway One		Waiouru -North Island
Waiuku	7	Martyn Street		Waiuku
Wanaka		Cardrona Road		Wanaka
Whakarewarewa		SH5	Kakapiko Lookout	Rotorua
Whangarei Industrial		High Street	Morningside	Whangarei
Whangaroa		Ness Road	Whangaroa	Northland
Whenuapai		Airfield Road	Whenuapai	Auckland
Whitianga Central		Flaxmill Bay Road		Whitianga

ST Name	ST Address Line 1	ST Address Line 2	ST Address Line 3	ST Address Line 4
Culverden		SH7		North Canterbury
Happy Valley	167	Happy Valley Road		Wellington
Huntly		Riverview Road		Huntly West
Hunua		Stevens Road		Hunua
Haruru Falls		Puketona Rd		Haruru Falls
Kaimai Lower	29	Thorn Road		Tauranga
Milton		Carendon Berwick Road		Otago
Ohakune		Ratamaire Road		OHAKUNE
Okaihau		Puketi Rd		Okaihau
Onetangi		Man 'O War Bay Road		Waiheke Island
Otematata		State Highway 83		Otago
Pakaraka		Kerikeri		Pakaraka
Picton		Mt Freeth		Picton
Pirongia	471	Sainsbury Rd		Pirongia
Rakaia		Overdale Road		Rakaia
Riverton	12	Lex Street		Southland
Ruawai		Gallie Road		Ruawai
St Arnaud		Borlase Ave		NELSON
Tangihua		SH14		Tangiteroria

ST Name	ST Address Line 1	ST Address Line 2	ST Address Line 3	ST Address Line 4
Taupo Straights		S H 5	R D 3	Taupo
Tuamarina		Parties Road		Tuamarina
Waihi		Rifle Range Road		Waihi
Waikouaiti		Quarry Road		Waikouaiti
Waipara		SH7		North of Waipara
Wairakei		Aratiatia Road		Taupo
Waiwera Township		No 1 State Highway		Waiwera
Winton		Sinclair Road		Winton

73 “Co-locates” in total between Vodafone & Telecom

51 “Co-locates” within the North Island

Vodafone says they have 51 Co-locates with Telecom in the North Island...

So what does Telecom have to say?

Telecom by email to Econet

“We only have about 3 sites where we share the mast - at the rest we share access tracks, power and other infrastructure etc”

Vodafone by email to Econet

“we have around 50 sites where others co-locate on our masts, with about 30 of these with telecom”

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Grass Track Road, Muriwai



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Muriwai - explanation

- Muriwai (Piha beach) conceived in 1996 by Telecom
- Vodafone began site acquisition around the same time
- Both Companies had Resource Consent declined
- Significant local community pressure applied to Telecom and Vodafone to co-locate
- Site became operational 1st March 2002
- It took 6-years to achieve what we believe is New Zealand's first ever cellular co-location.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Gallie Road, Ruawai



Genuine Co-location

At this site, Telecom is providing co-location services to Vodafone on a Telecom transmission tower.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Newcastle Road, Hamilton



Genuine Co-location

At this site, Telecom is providing co-location services to Vodafone on a Telecom transmission tower.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

So what about the other 48 sites?

- Vodafone want you to believe that they're also co-locates with Telecom
 - Econet doesn't agree
 - We even doubt that Telecom agrees
 - You decide...

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

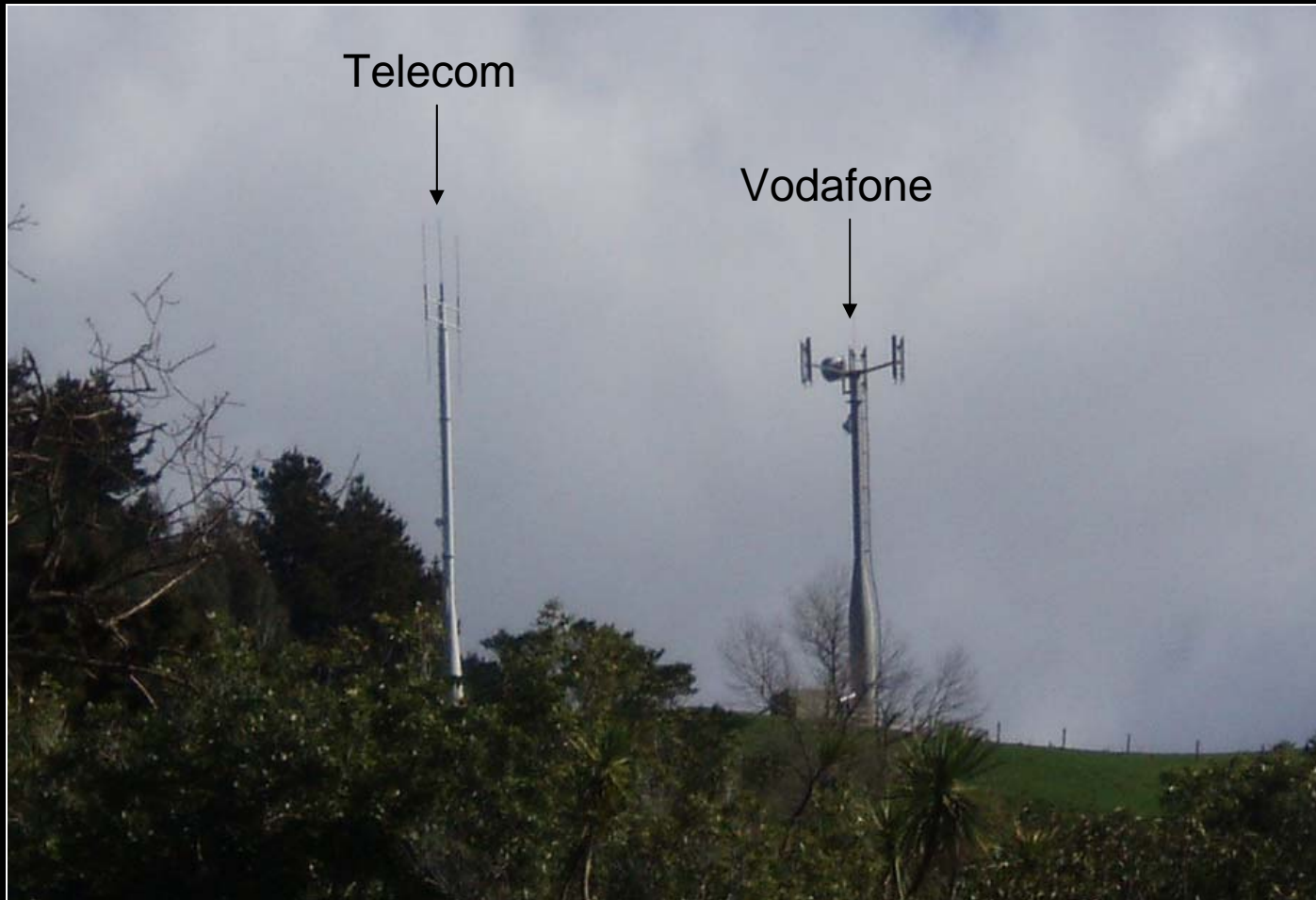
What do you call two towers, a Vodafone tower and a Telecom tower, standing next to each other?

A Vodafone “co-location” of course...

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Rule Road, Dannevirke



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

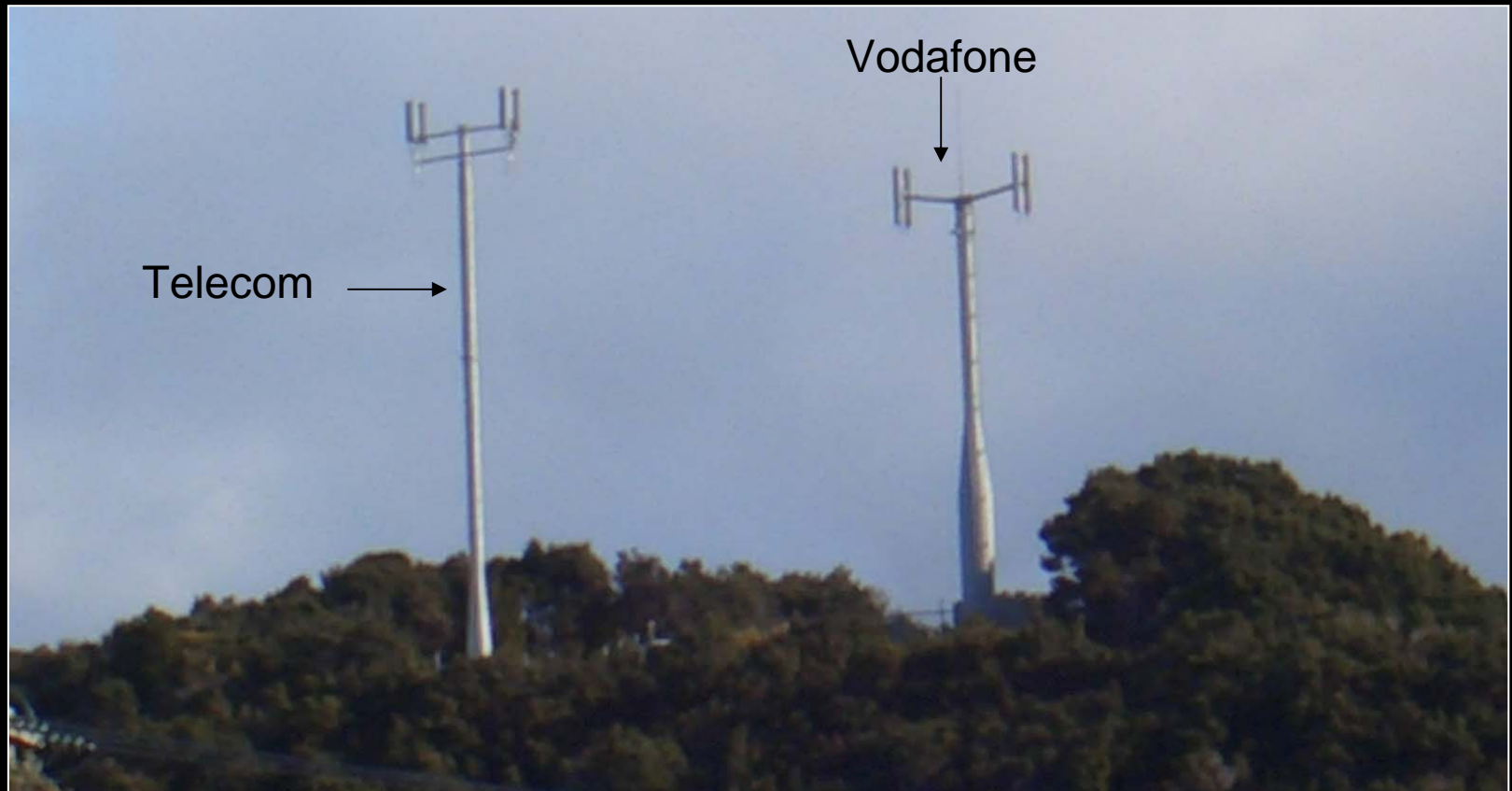
McNicol Road, Clevedon



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Puketona Road, Haruru Falls



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Riverview Road, Huntly



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

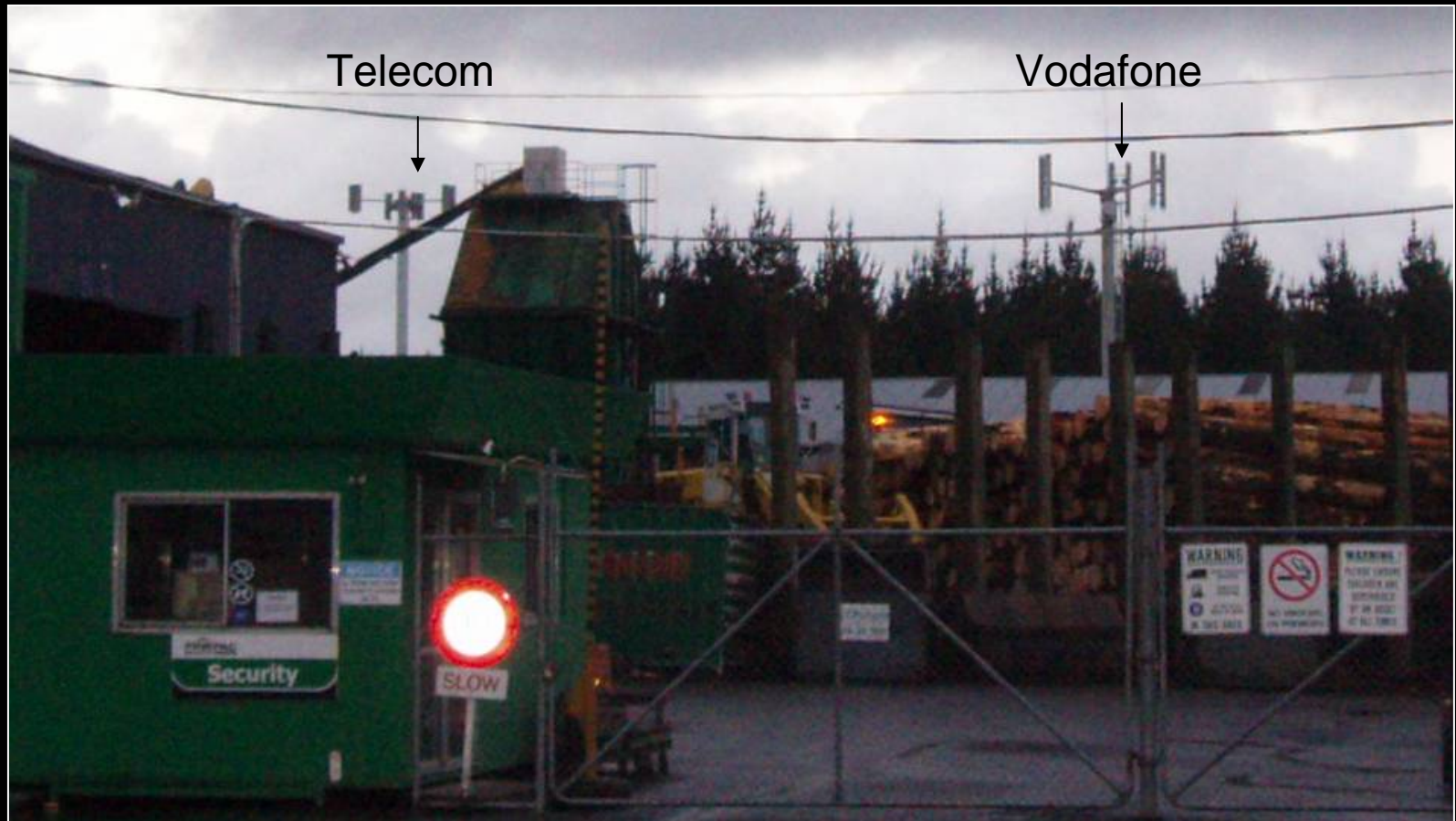
What do you call a Vodafone tower standing next to a Telecom tower with no obvious need to share either power or access?

A Vodafone “co-location” of course...

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Airfield Road, Whenuapai



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

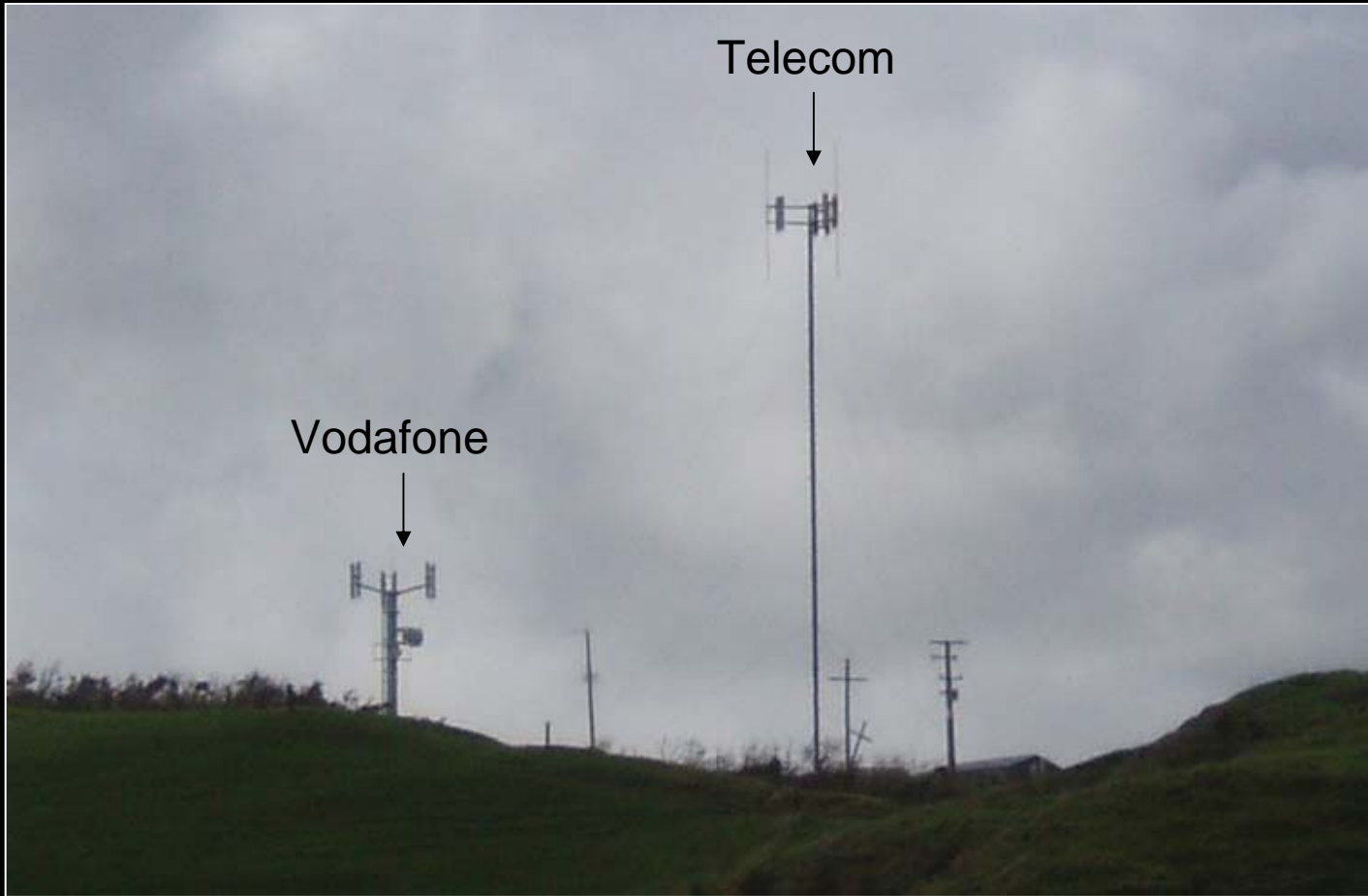
Stevens Road, Hunua



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Korimako Lane, Kaitia



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

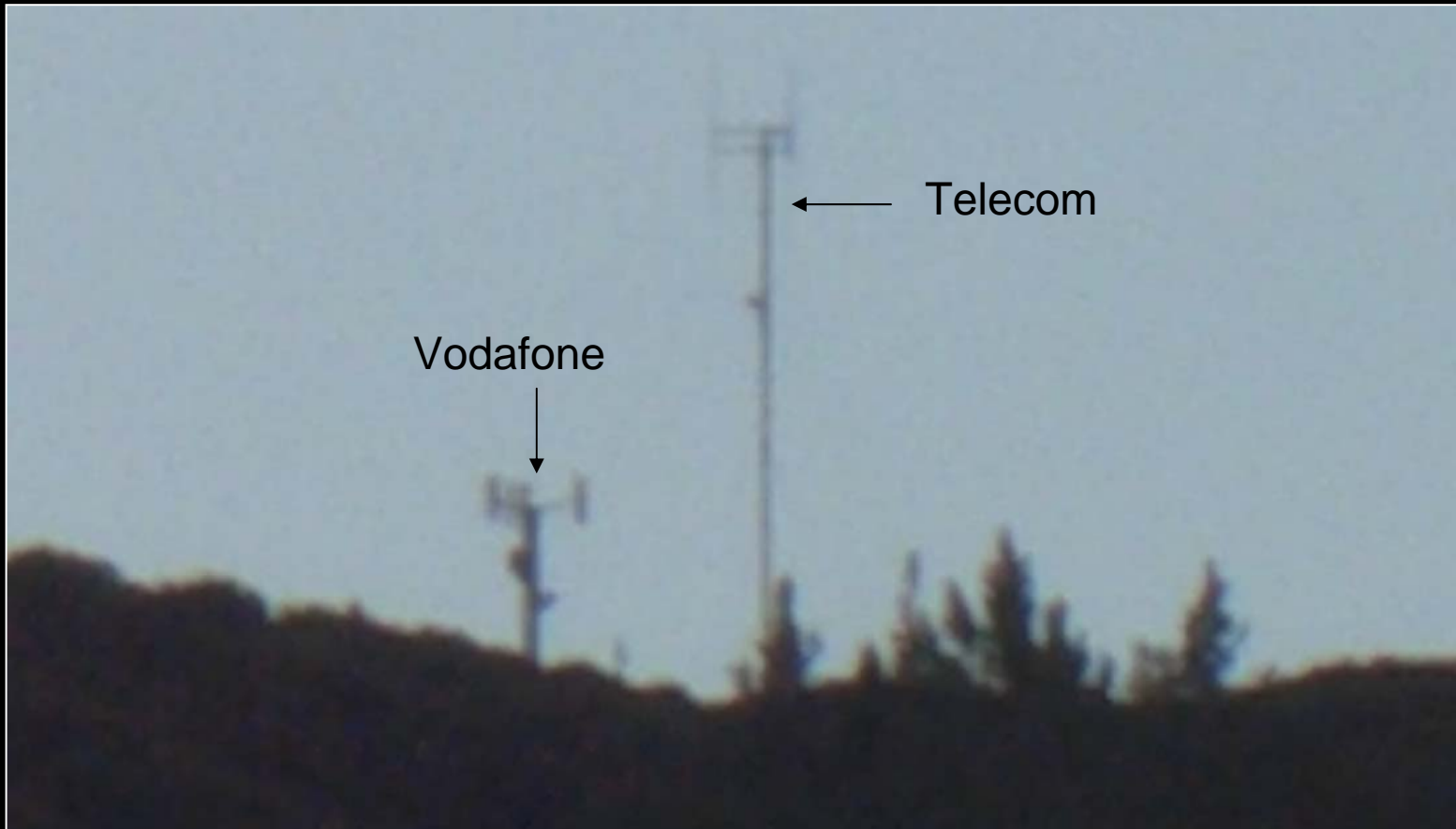
Waterworks Road, Kaitoke



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“Co-location” according to Vodafone

Whangae Road, Kawakawa



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Vodafone:

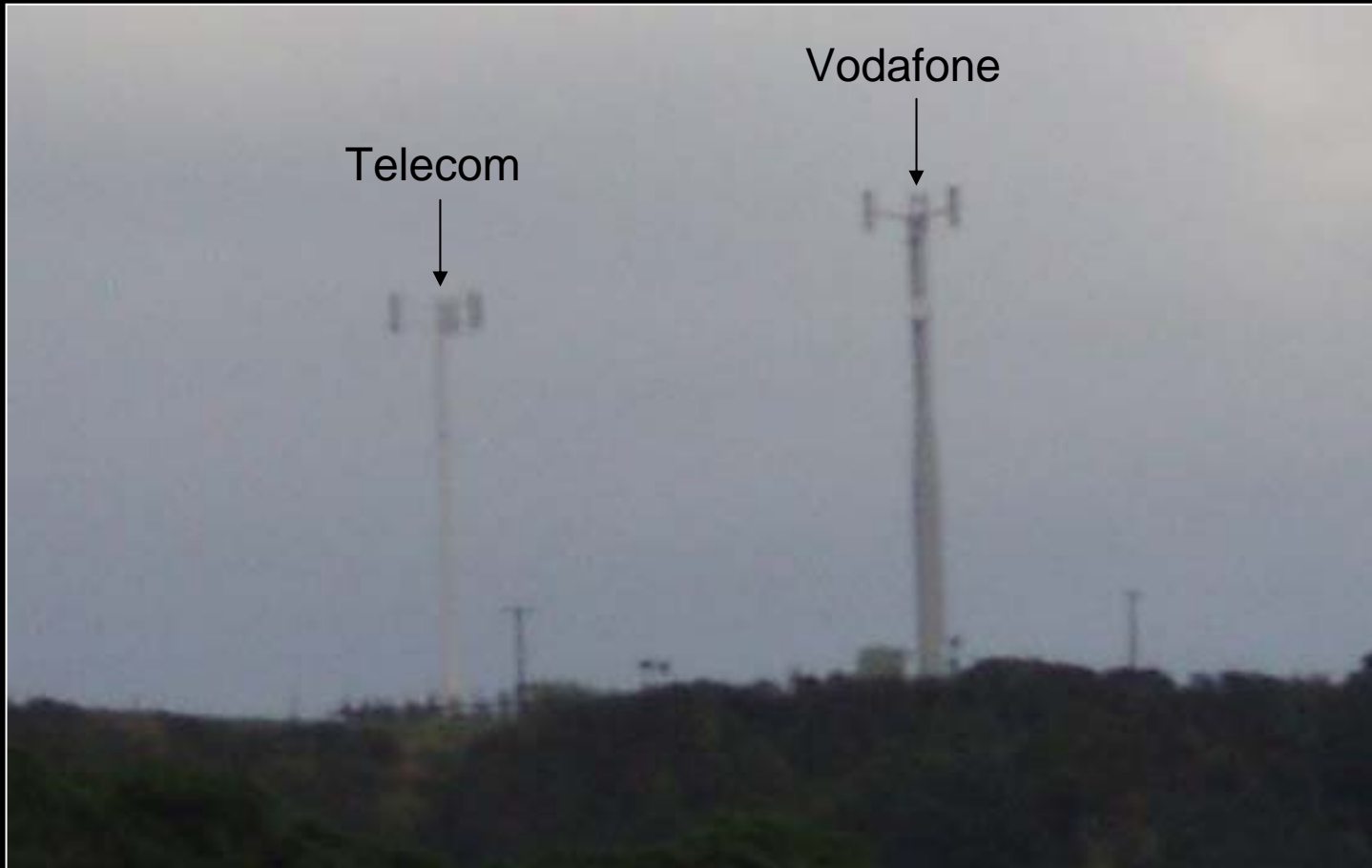
“But we’re sharing the access track”

- Who owns the access track? Vodafone, Telecom or the farmer? Could Vodafone or Telecom realistically deny access to another operator?
- Also, we’re not talking about a big cost here. The access tracks are typically either dirt tracks or gravel, they’re not sealed.
- Typically, they’re not very long either. Farmers usually have their own access tracks over their farms. Operators use these existing access tracks meaning that most access tracks only require <100m of new track to be installed.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Cove Road, Mangawhai



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

SH1, Maroanui Hill



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Riverside Road, Martinborough

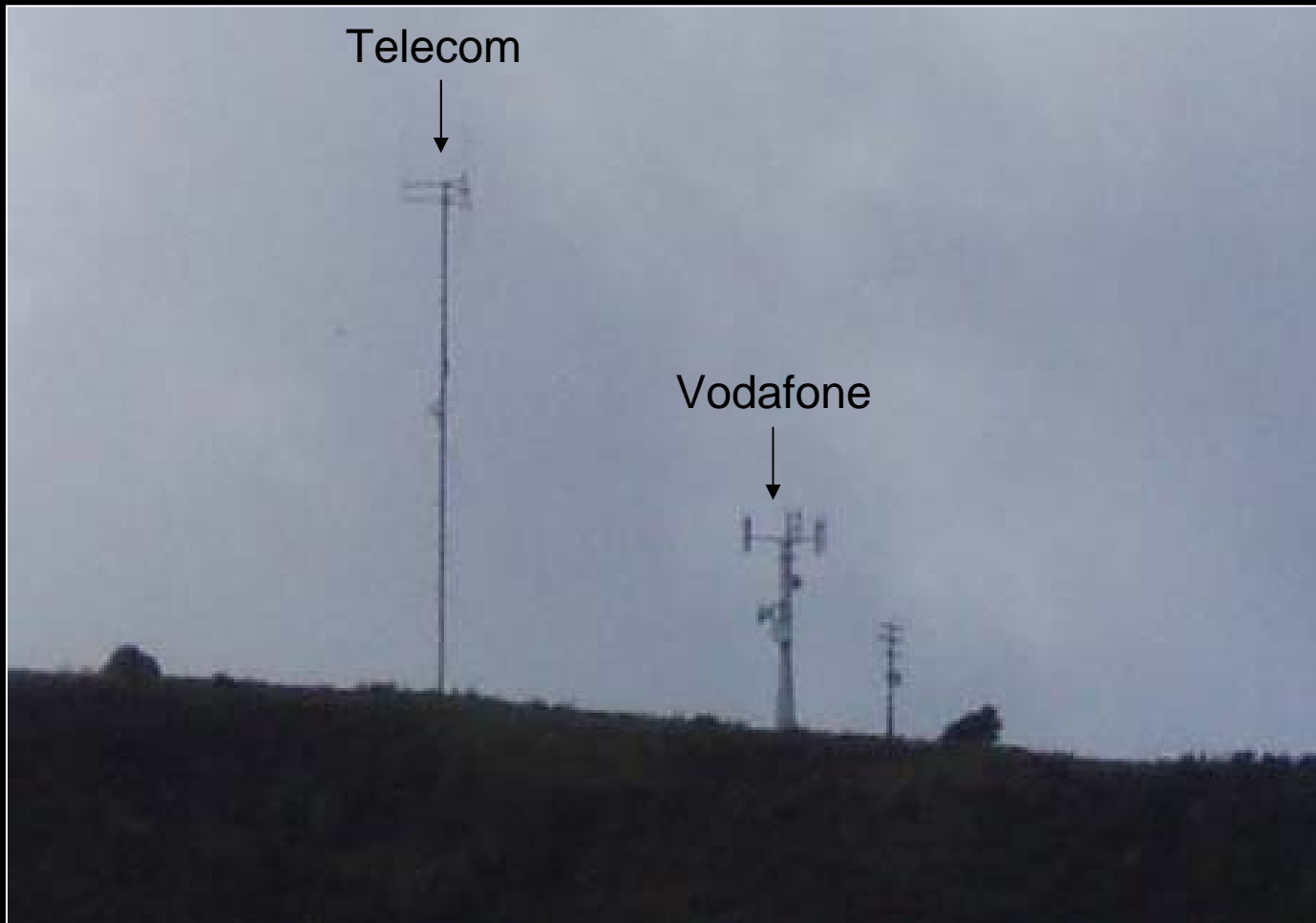


Photo taken from over 10km away during heavy rainfall.
There is a possible fourth tower at this site.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Ness Road, Whangaroa



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Ratamarie Road, Ohakune

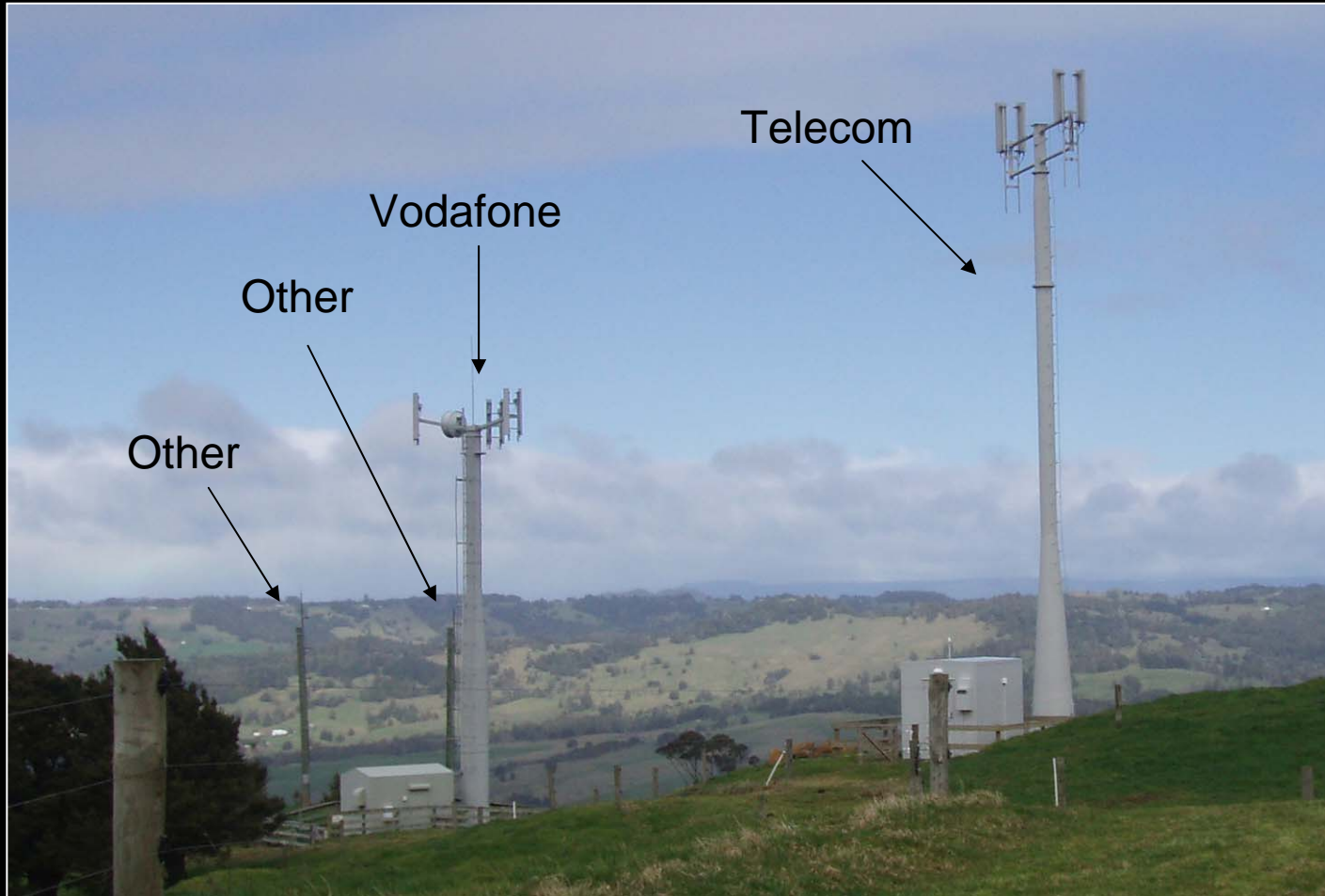


Photo taken from almost 2km away at dawn during very heavy rainfall.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Puketi Road, Okaihau



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Vodafone:

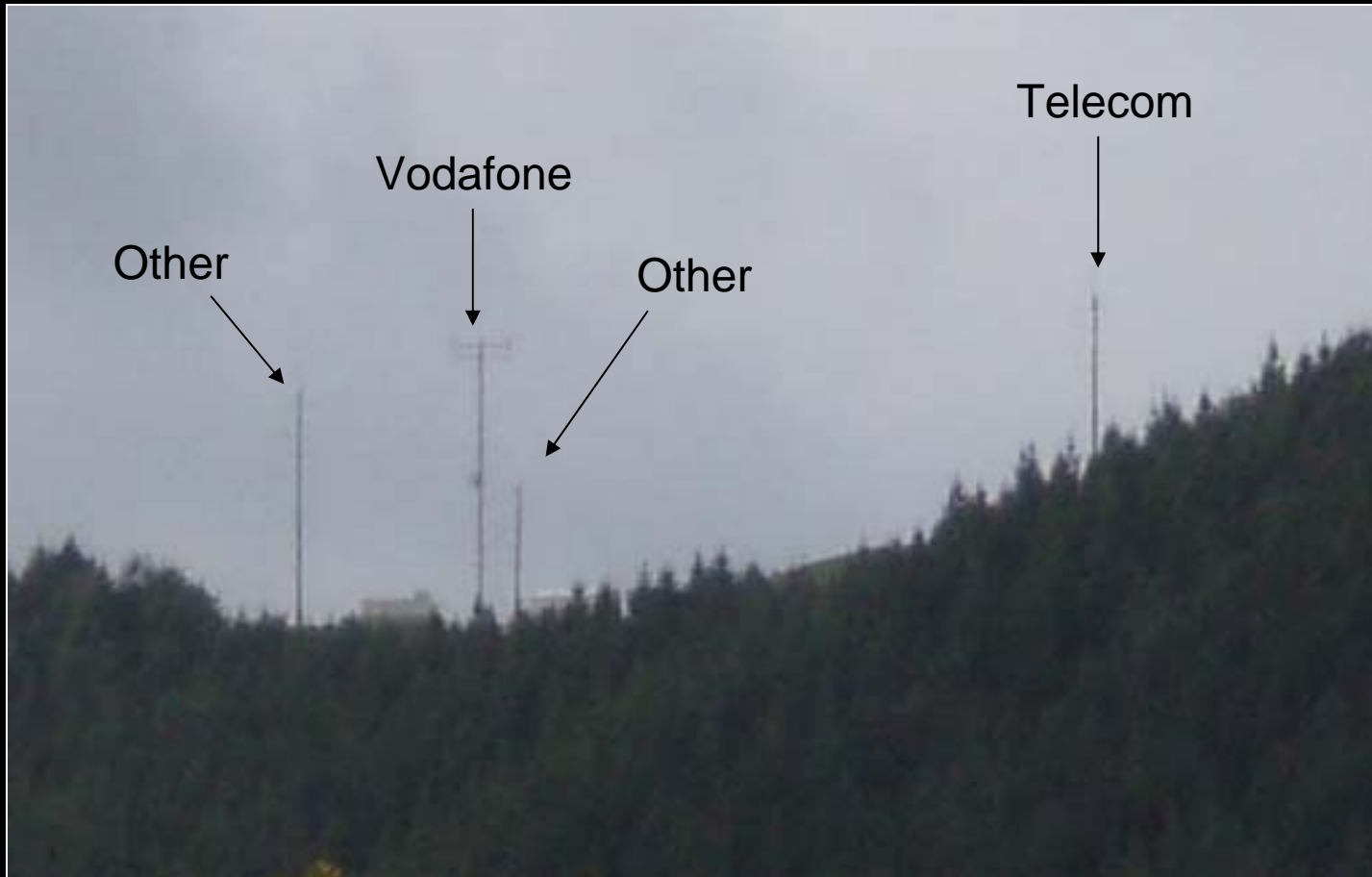
“But we’re sharing the power supply”

- Who owns the power lines? Vodafone, Telecom or the lines company? Could Vodafone or Telecom realistically deny access to another operator?
- Also, in rural areas, it’s quite common for customers to pay a capital contribution for new lines to be installed and if in the future a second customer wants to access those lines they pay a further capital contribution which is used to partly reimburse the first customers capital contribution.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

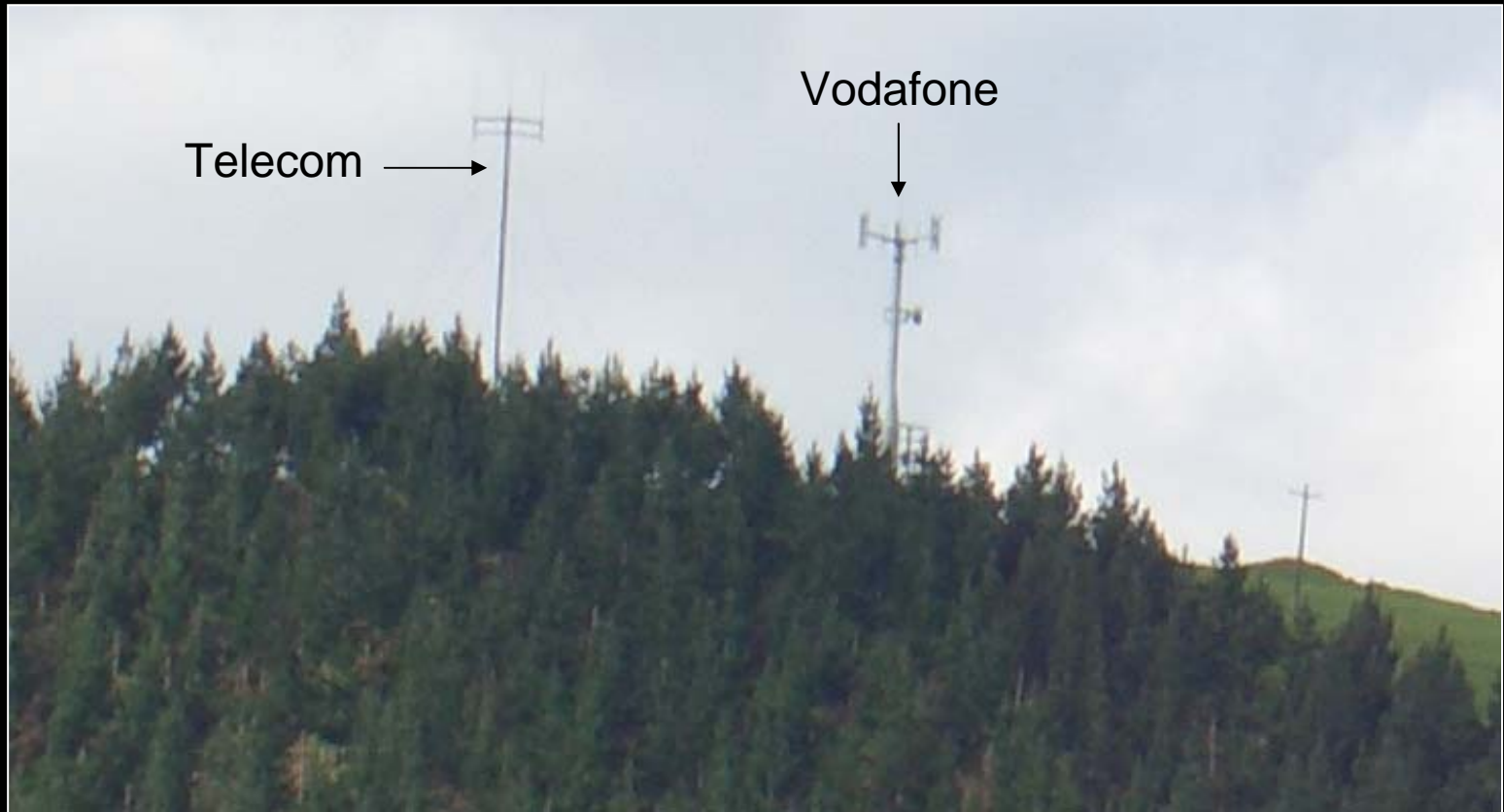
Waitohu Valley Road, Otaki



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Aorangi Road, Paeroa



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Pakaraka, Kerikeri



Lies, damned lies and ~~statistics~~ Vodafone Submissions
“Co-location” according to Vodafone

Sainsbury Road, Pirongia



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

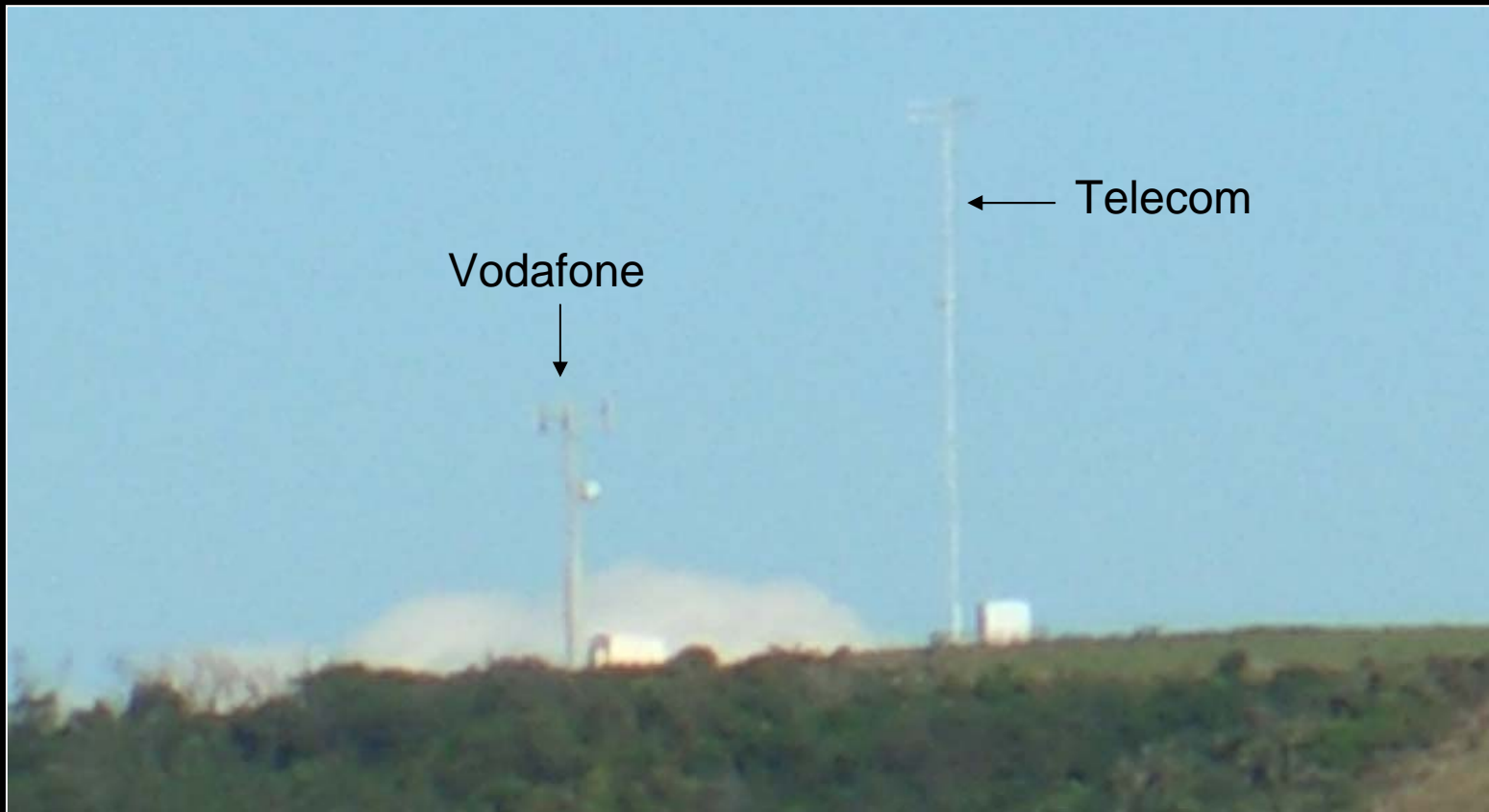
Cole Road, Pokeno



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Te Hutewai Road, Raglan



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Paradise Valley Road, Ngongataha



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Gee Road, Pukepoto

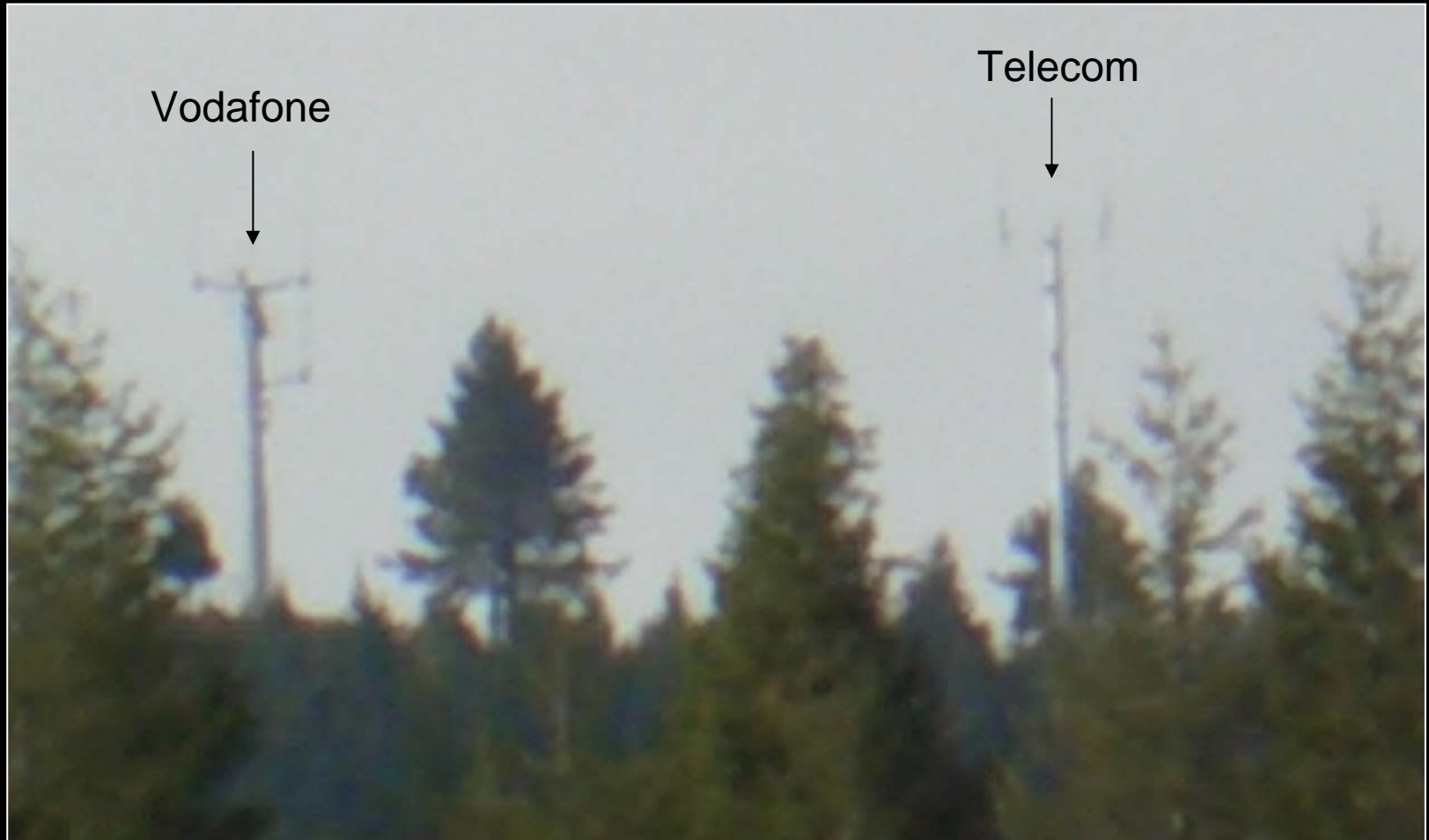


Photo taken from almost 5km away. However, there are very clearly two cellsites when viewed using binoculars.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

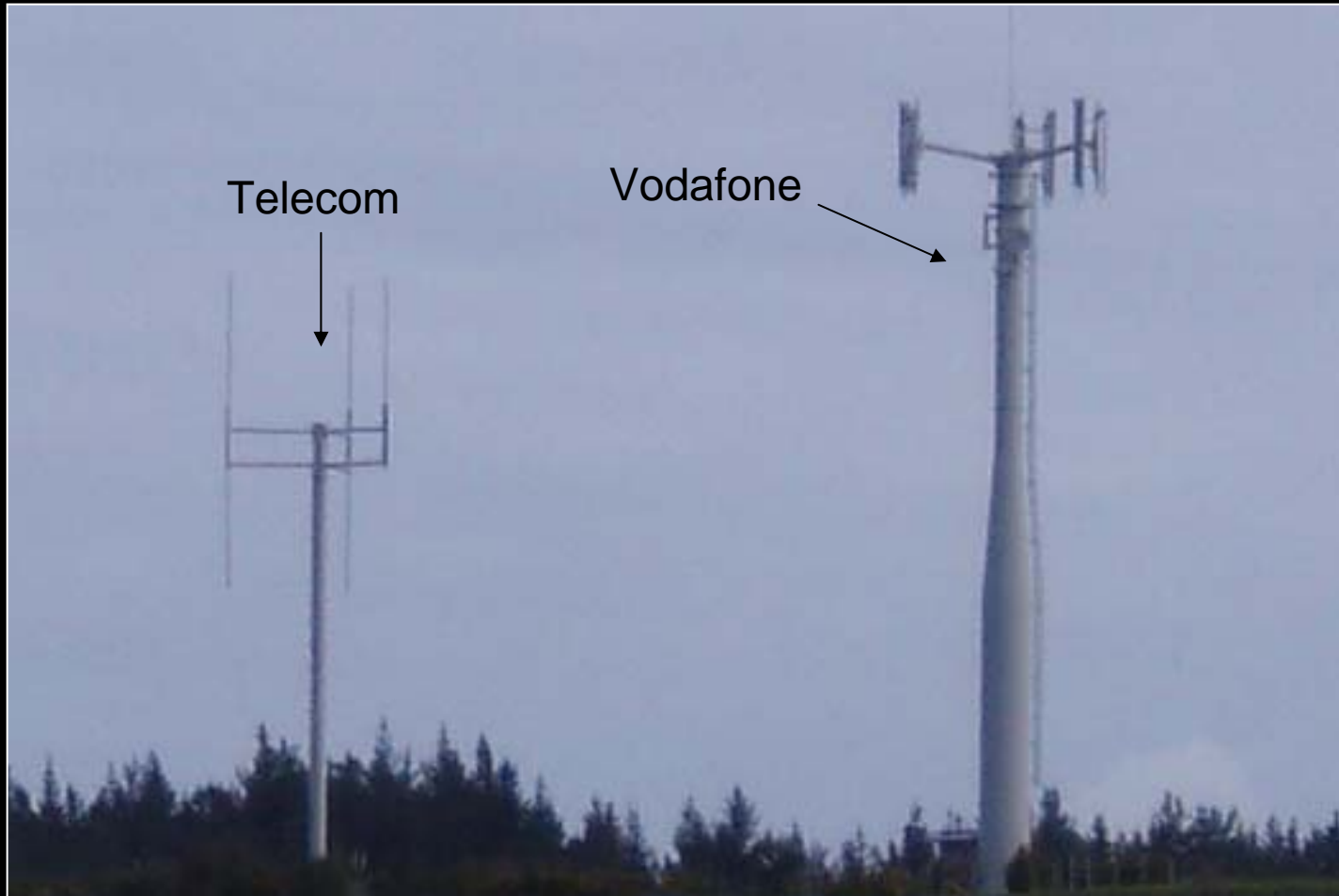
SH5, Kakapiko Lookout



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

SH14, Tangiteroria



Lies, damned lies and ~~statistics~~ Vodafone Submissions
“Co-location” according to Vodafone

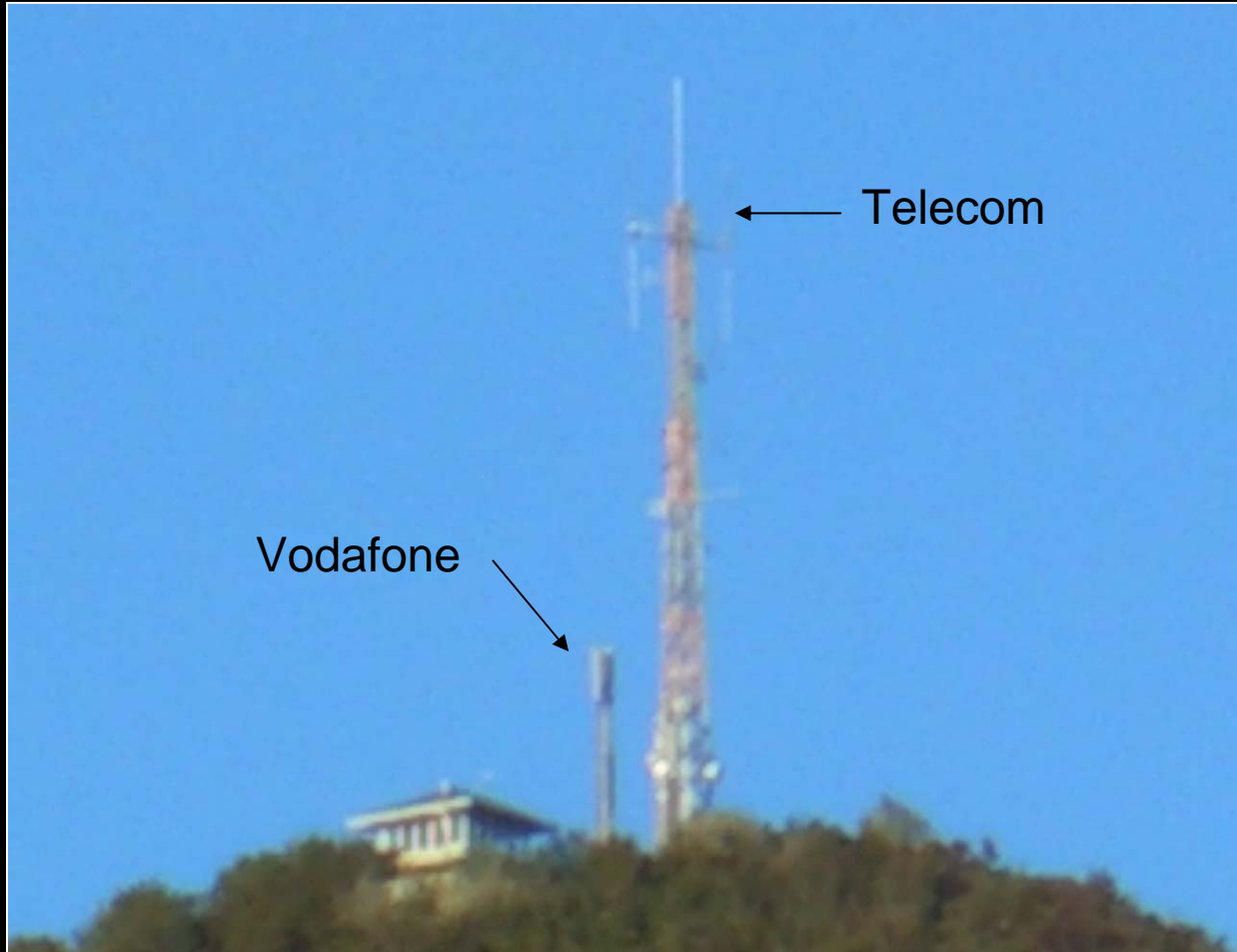
What do you call a Vodafone tower standing next to, and being dwarfed by, a massive Telecom lattice transmission tower?

A Vodafone “co-location” of course...

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

SH5, Taupo Straights



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

What do you call two towers that are:

- On separate hilltops
- In separate paddocks
- So far apart that we struggled to get them both into the one picture?

A Vodafone “co-location” of course...

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

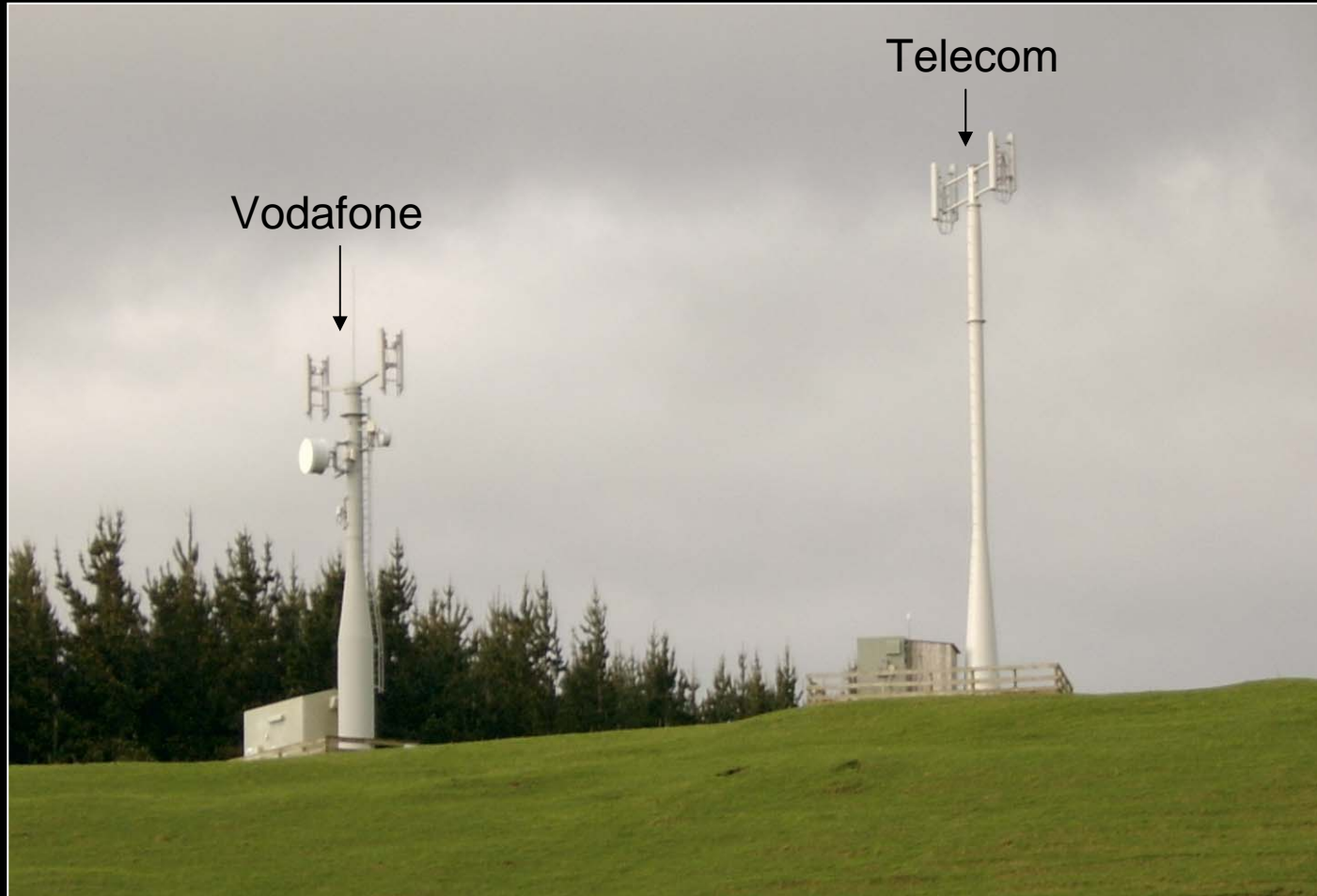
Aratiatia Road, Taupo



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

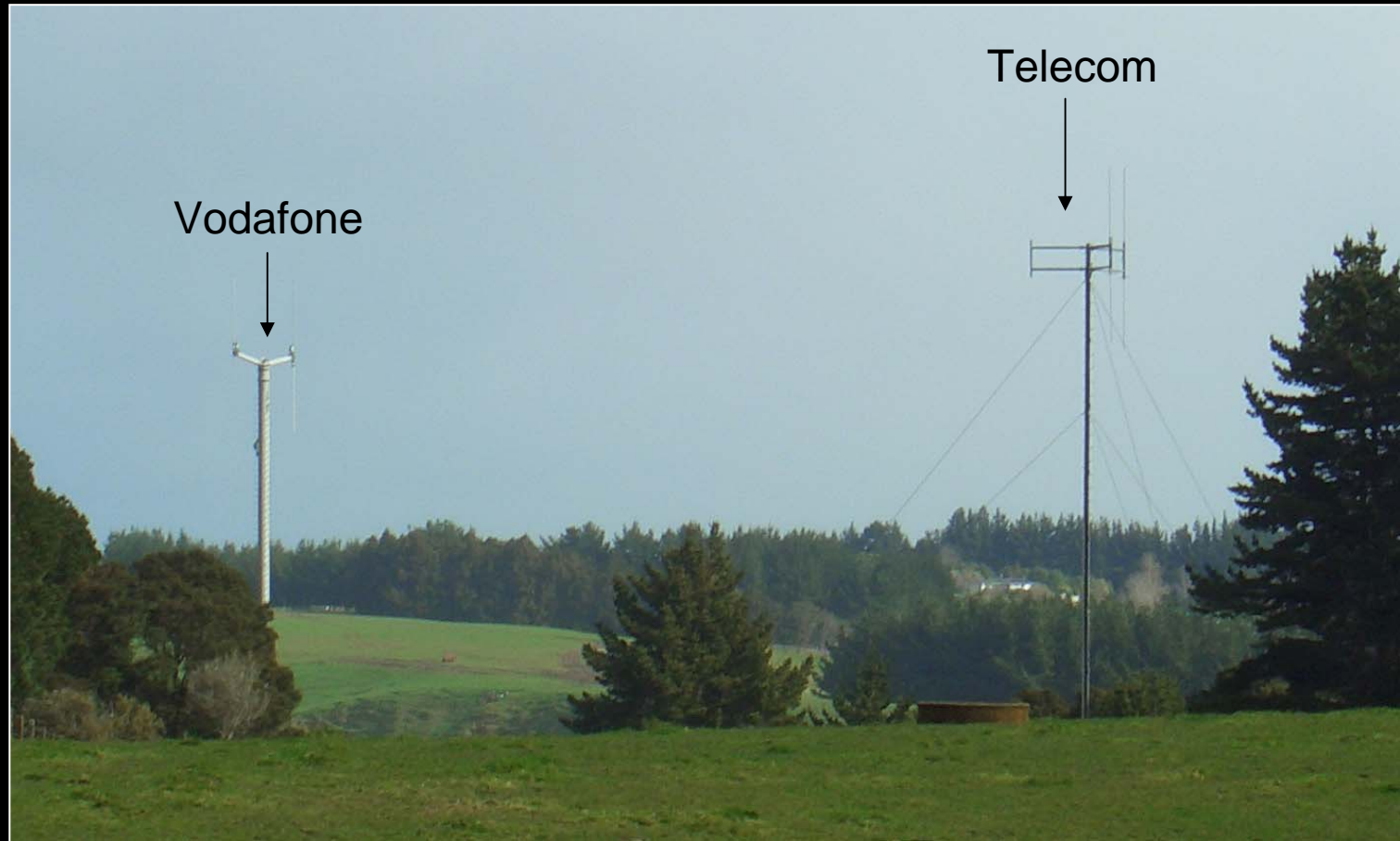
Thorn Road, Tauranga



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Whangamarino Rd, Te Kauwhata



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

What do you call one Vodafone tower that:

- Doesn't have any other tower nearby
- Doesn't have any other companies cellular equipment installed on it
- Only installed cellular equipment is Vodafones...?

A Vodafone “co-location” of course...

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Halls Road, Te Kauwhata



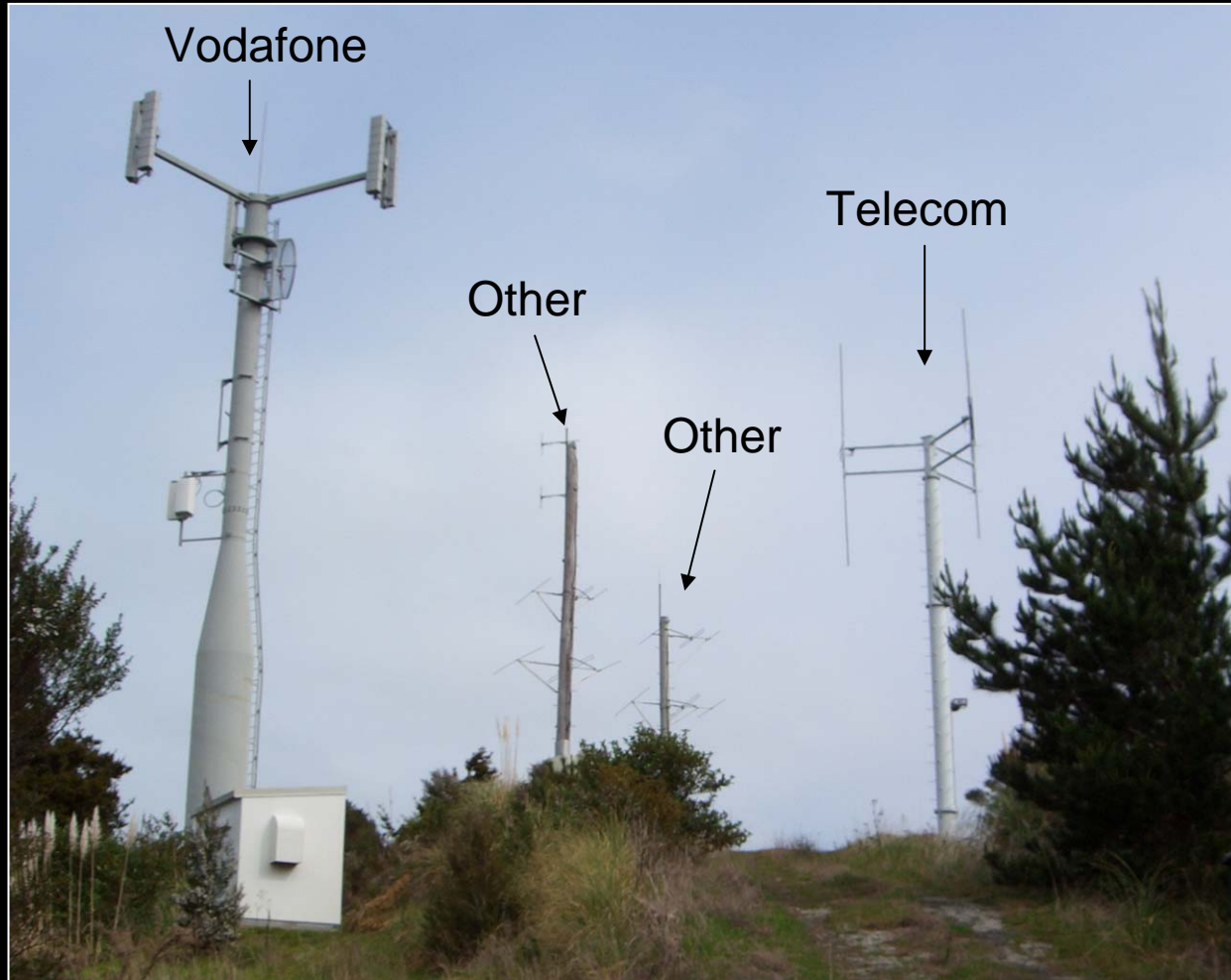
Complete nonsense

This site only has Vodafone equipment installed on it, yet Vodafone claims it is a “co-locate”. The Telecom site that Vodafone claims this is co-located with is over 2.5km away.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

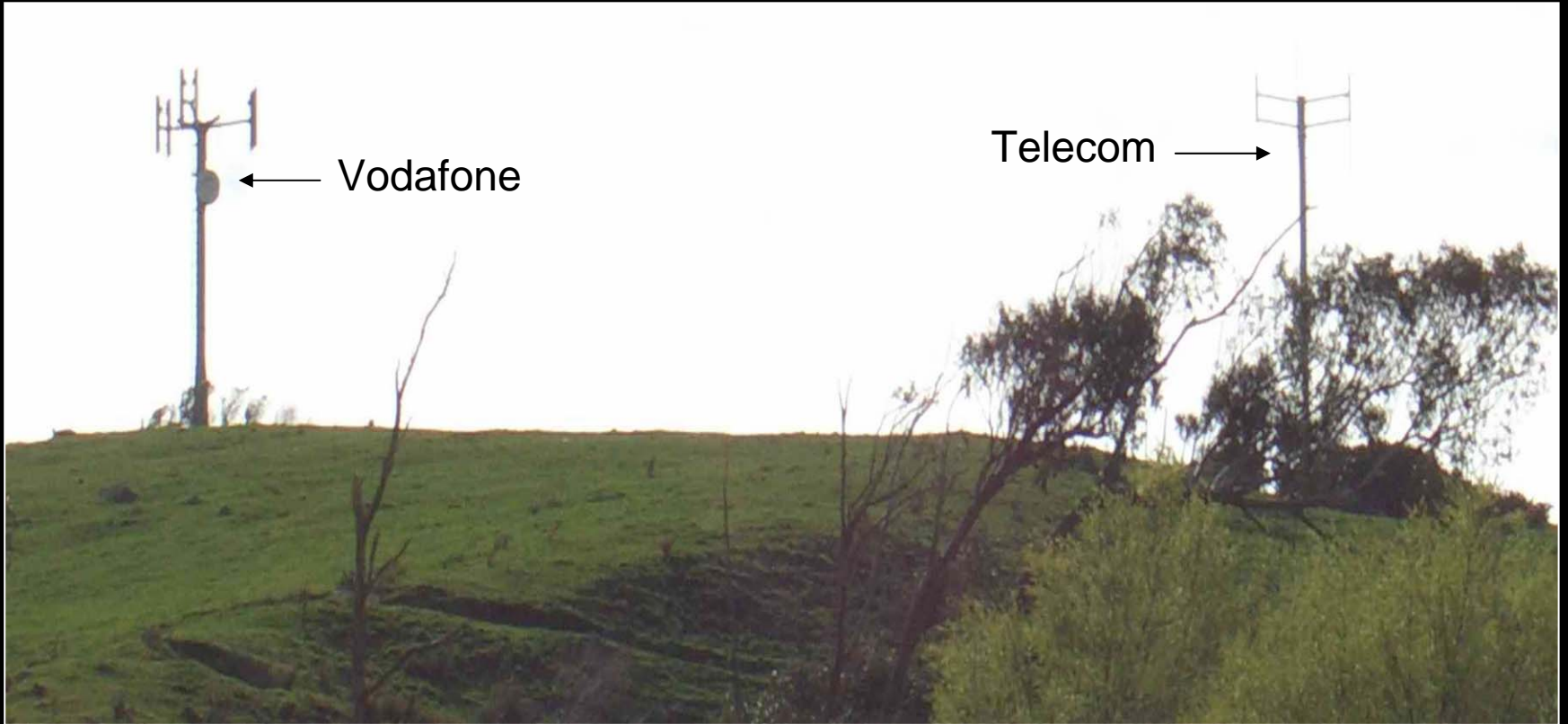
Matapuri Road, Tutukaka



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Rifle Range Road, Waihi



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

SH1, Waiouru

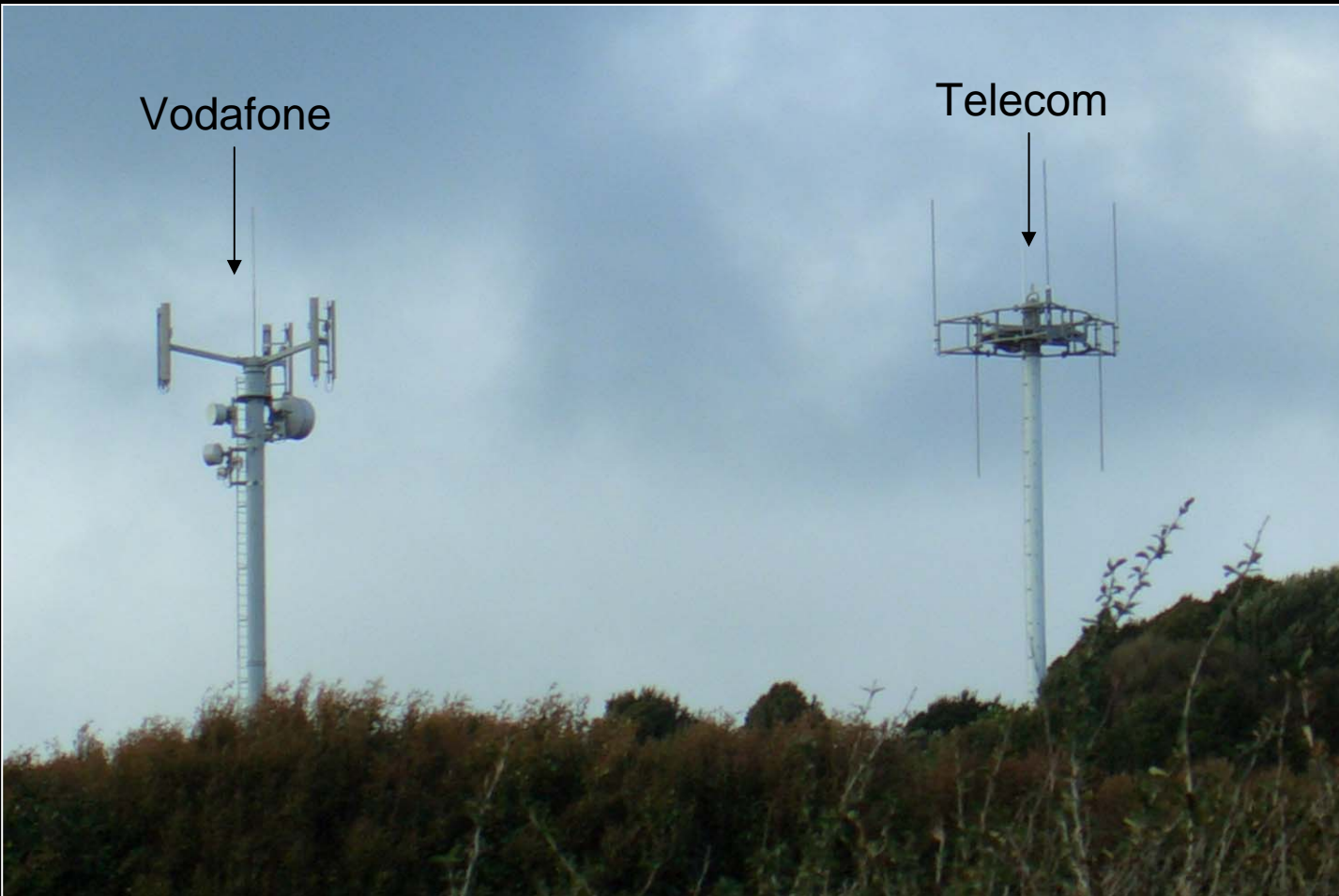


Photo taken at dawn during snowfall. Sites are just over 100m apart.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Masters Road, Waiuku



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

What do you call a Vodafone tower and a Telecom tower that:

- Are separated by more than one City block
- Have several factories in between them
- Have a road in between them
- Even has a Police Station between them
- Were so far apart, we (yet again) struggled to fit them both into the one picture?

A Vodafone “co-location” of course...

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

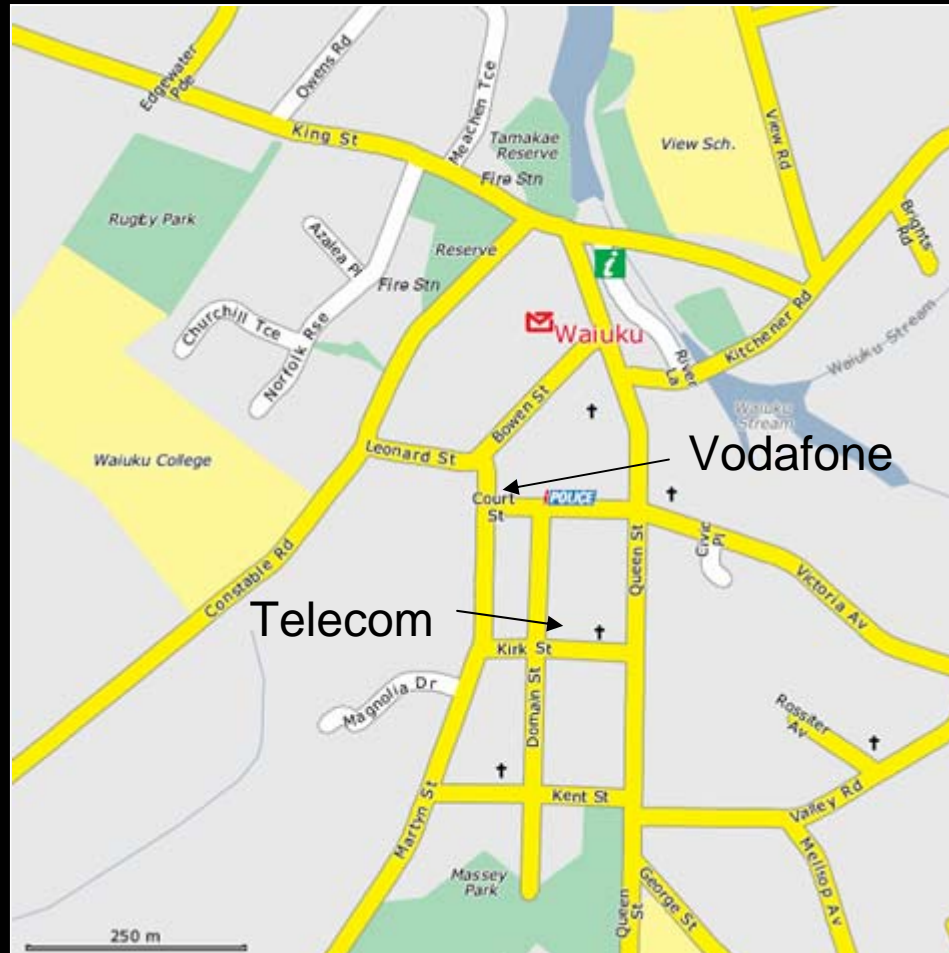
Martyn Street, Waiuku



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Martyn Street, Waiuku



Lies, damned lies and statistics Vodafone Submissions

“Co-location” according to Vodafone

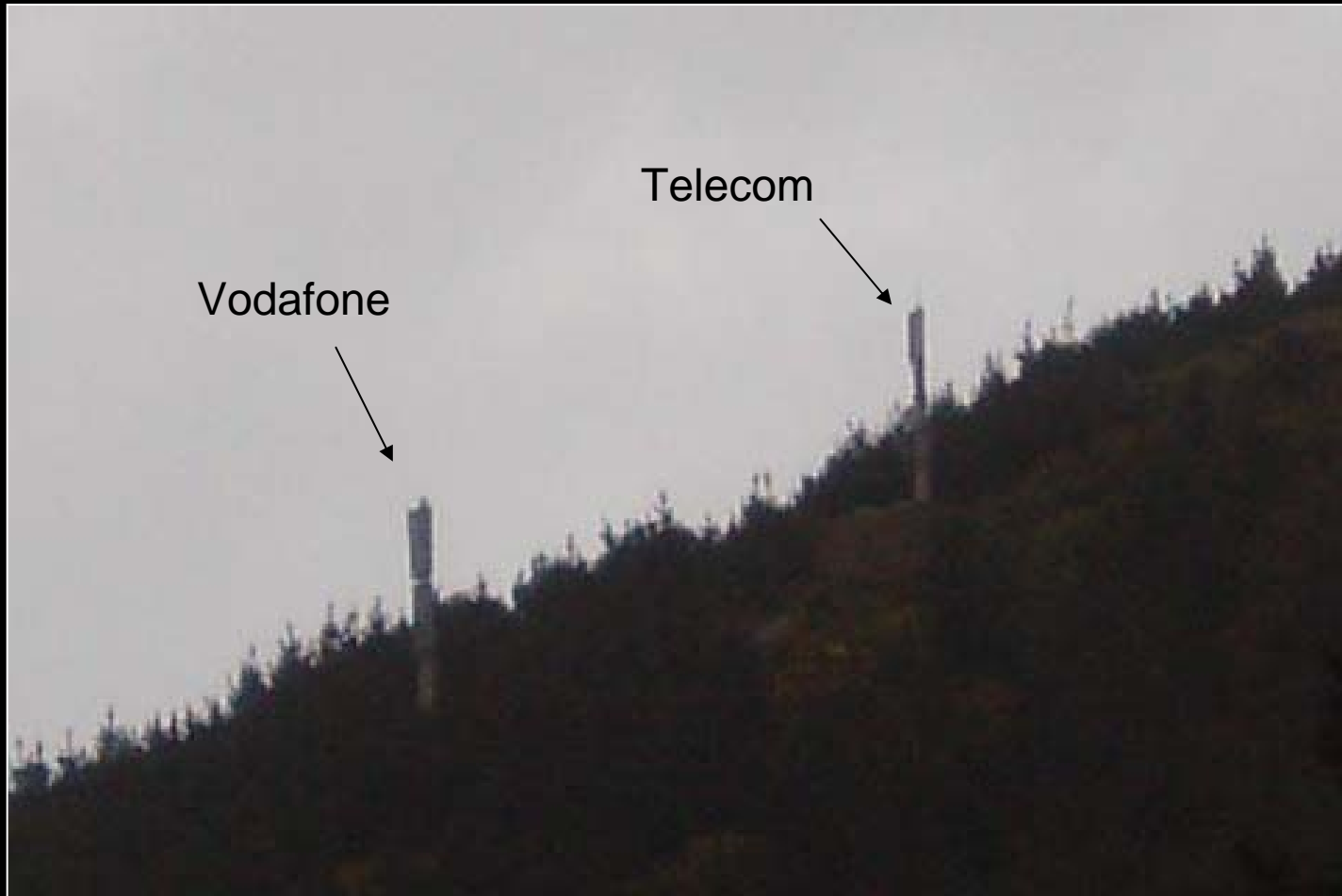
SH1, Waiwera



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Happy Valley Road, Wellington



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

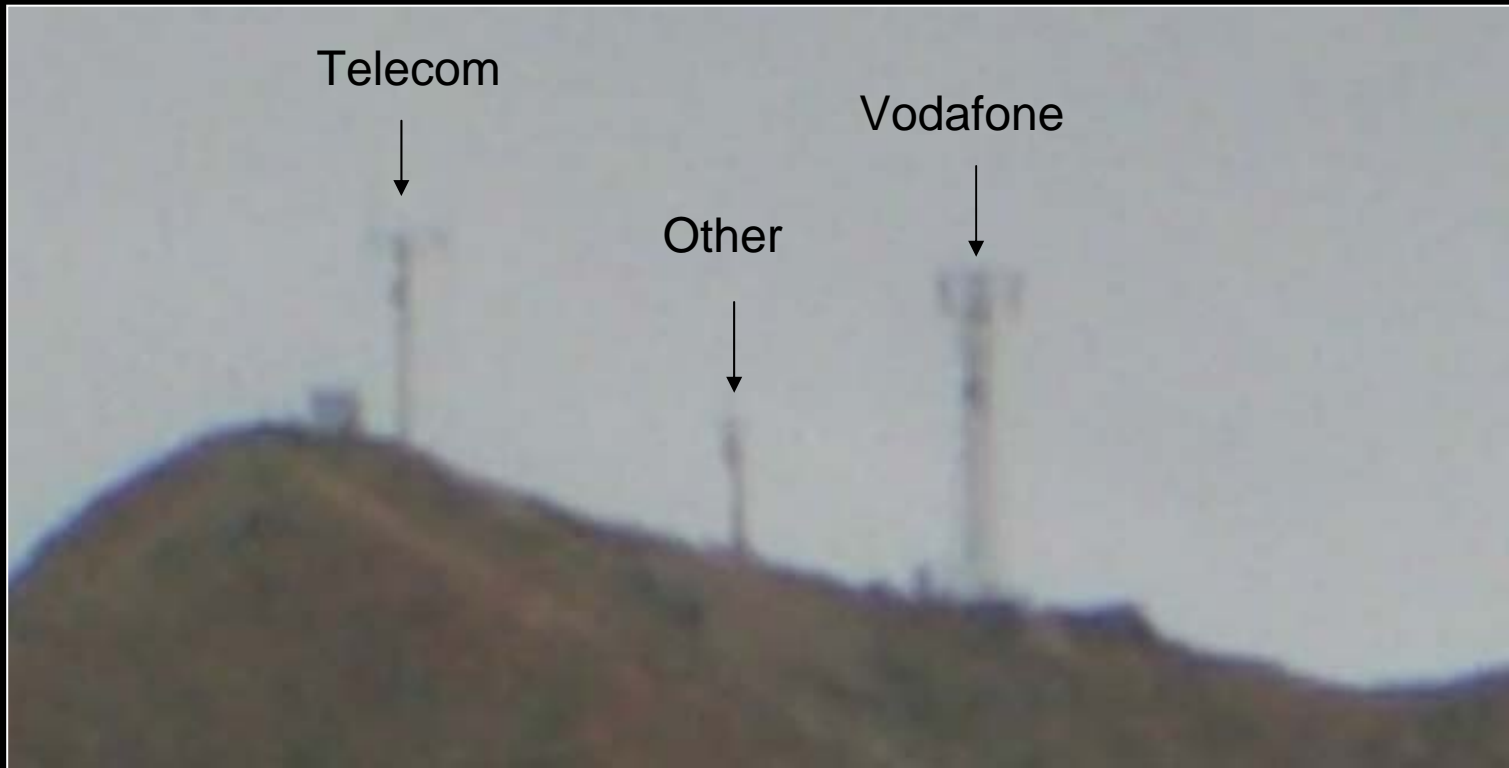
SH1, Paekakariki



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

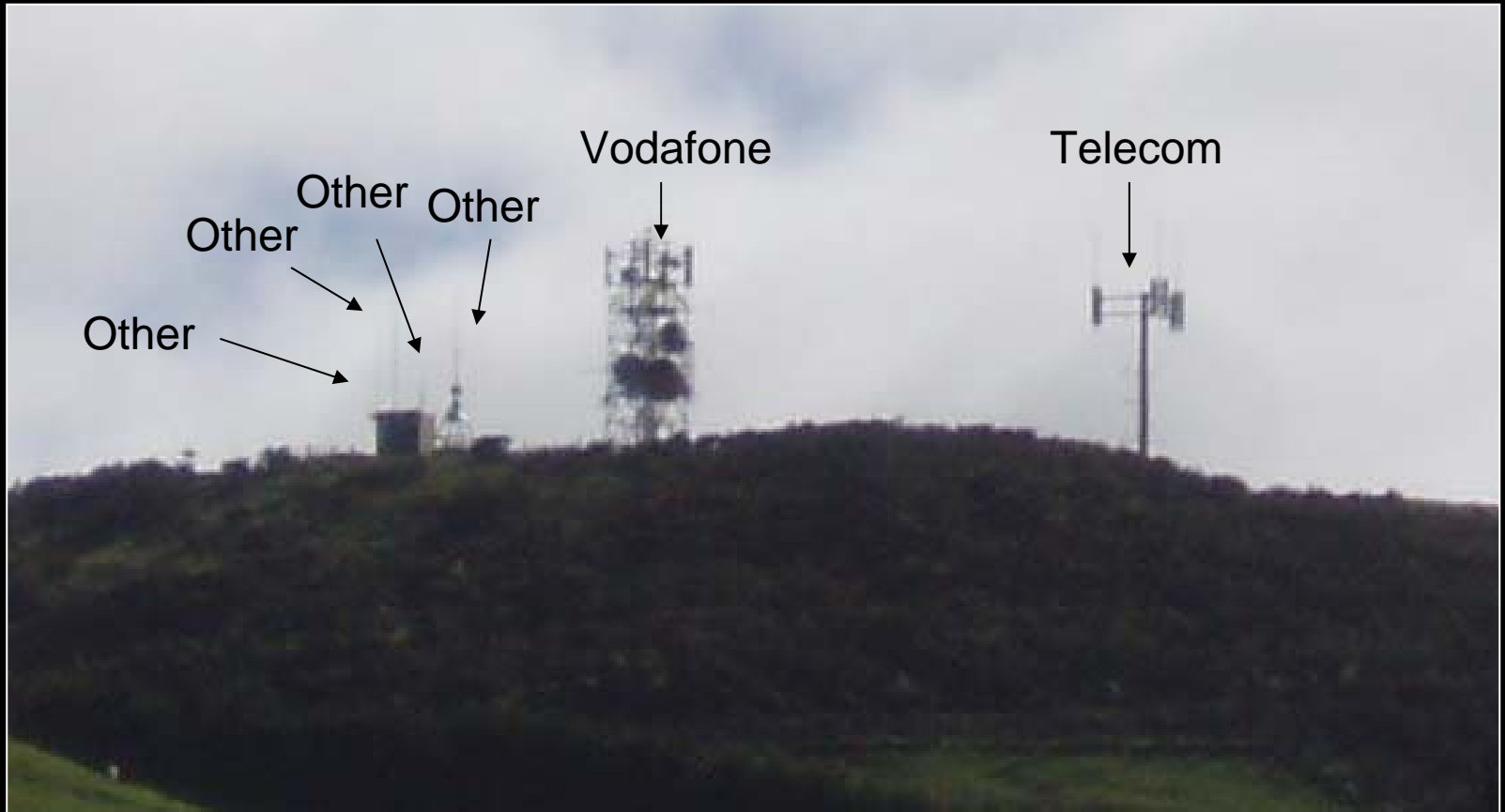
Kahu Road, Whakamaru



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

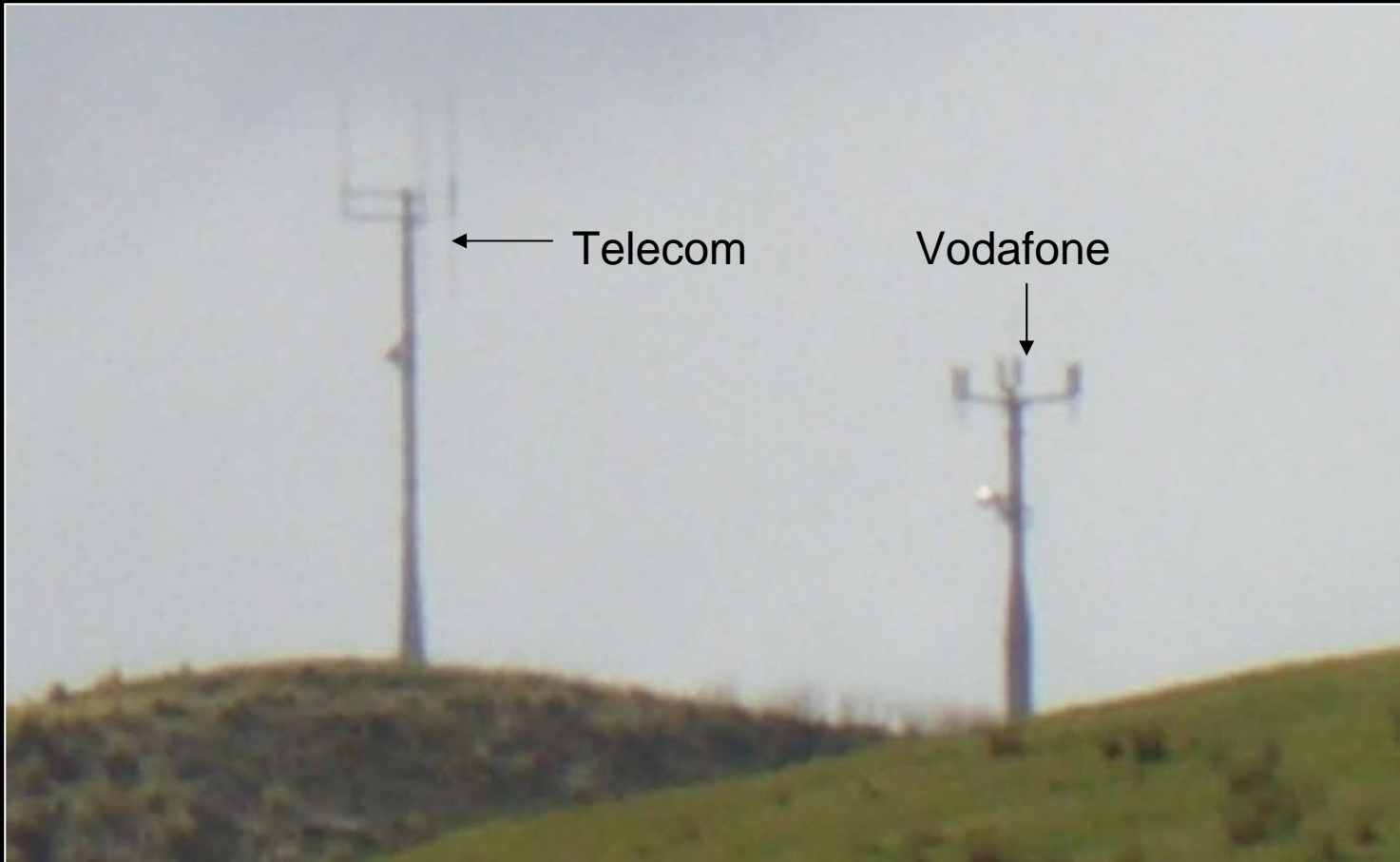
Parakiore Road, Whangarei



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

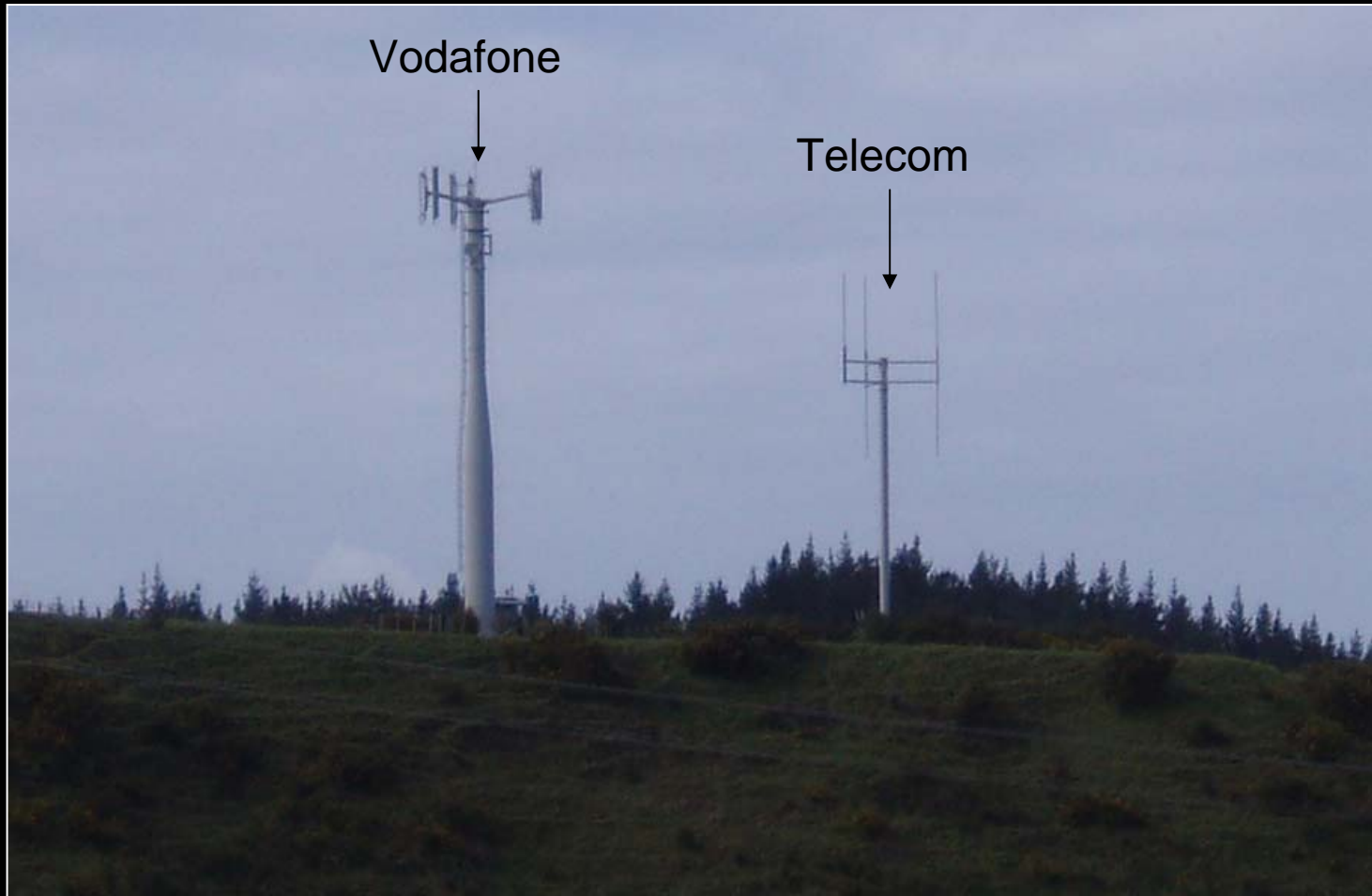
Portland Quay Road, Whangarei



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

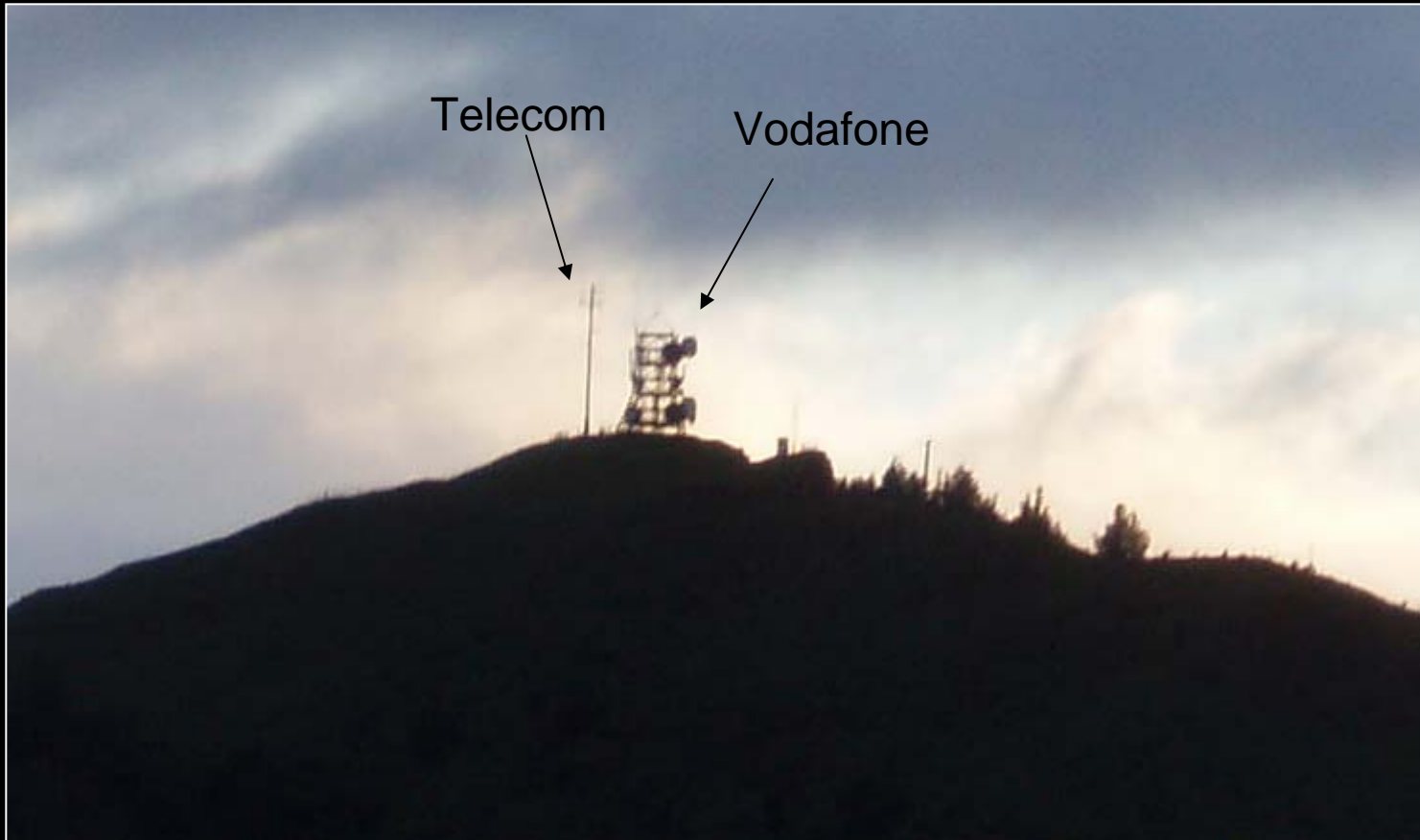
High Street, Whangarei



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

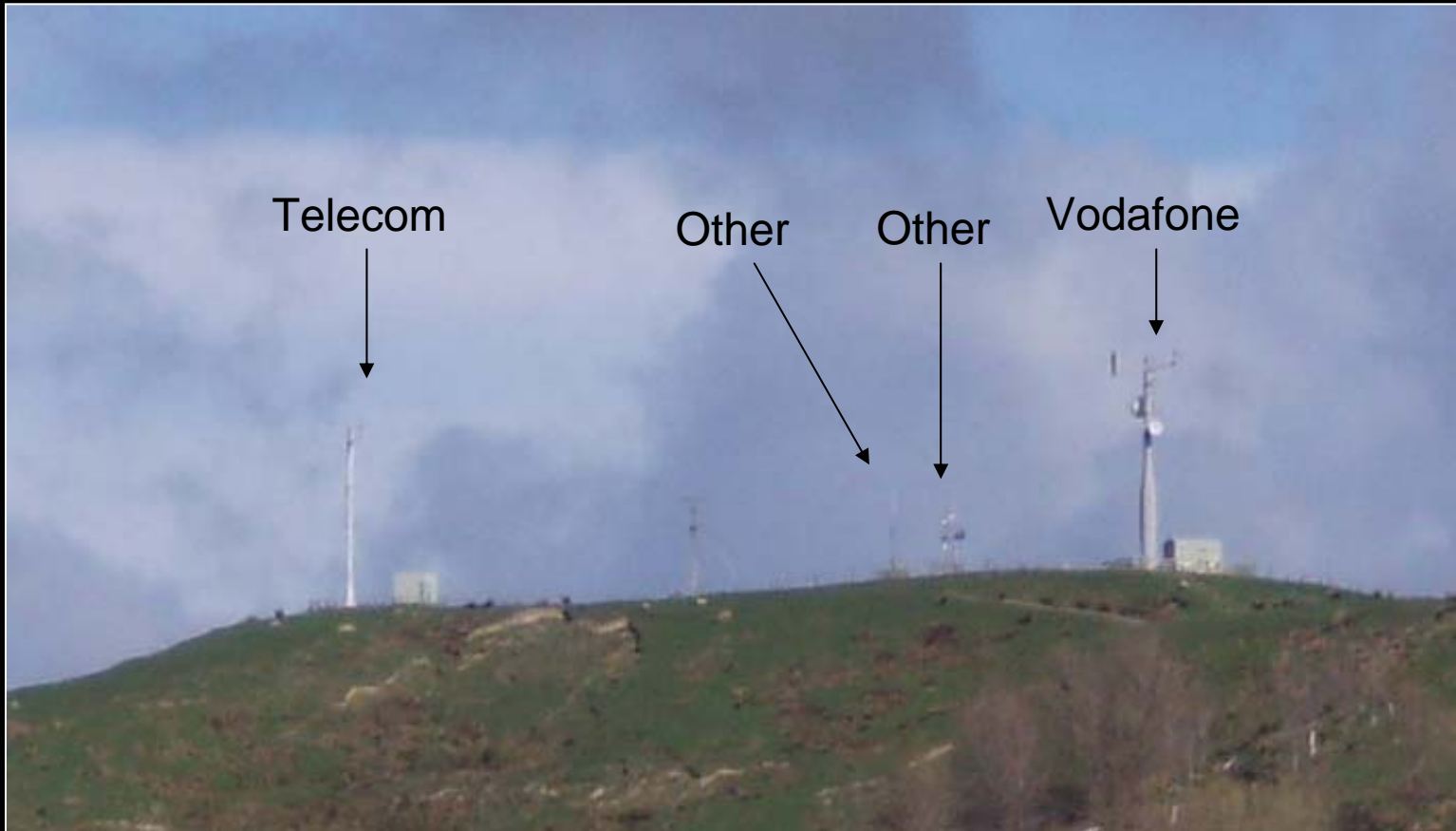
Ohura Road, Pukepoto



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

West Road, Mangatainoka



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Mangatainoka – The home of Tui



Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Co-location works

We have over 100 Co-locates!

Yeah right.



vodafone™

- *There are only three genuine cellular co-locates in New Zealand. Muriwai, which the community forced, and two other Telecom lattice transmission towers where Vodafone has installed kit*
- *Vodafone does not provide co-location services on any of their towers to any cellular operator anywhere in New Zealand*

We'd love to agree a fair roaming deal with new entrants!

Yeah right.



- *Since 2001, Econet has been in negotiations with Vodafone. Vodafone have never offered a fair price.*
- *Internationally, 5-yrs without a deal and no government intervention is unheard of.*

Country	Operator	Time taken	Possible Suppliers	Pricing Agreed
Australia	Hutchison	< 6-months	3	Cost based
Ireland	Meteor	< 6-months after Joint Dominance	2	Cost based
South Africa	Cell C	< 6-months	2	Cost based

- *The only difference is that in each of these markets, Vodafone wasn't the monopoly provider of roaming services.*

The OECD benchmarking is wrong!

Yeah right.



- *Both the Ministry of Economic Development and the Commerce Commission have confirmed that New Zealand's mobile prices are the highest in the OECD.*
- *It is cheaper for Vodafone Australia customers who are internationally roaming in New Zealand to make calls than it is for local Vodafone customers at home in New Zealand.*

Leave it to us
Self regulation works!

Yeah right.



- *Number Portability after over 10-years of delay still isn't here*
- *Co-location after over 5-years of delay still isn't here*
- *Roaming after over 5-years of delay still isn't here*
- *Competition still isn't here!*
- *The only thing that the New Zealand telecommunications industry leads the OECD in is denial, procrastination and delay.*

Lies, damned lies and ~~statistics~~ Vodafone Submissions

- Vodafone does not provide co-location services on any of its towers to any other mobile operator anywhere in New Zealand
- Co-location is not working in New Zealand
- Econet's experience trying to negotiate roaming with Vodafone has been as farcical as Vodafone's co-location claims
- Vodafone does not want to agree a fair commercial roaming deal
- The Commerce Commission must:
 - Extend the regulation of Roaming
 - Extend the regulation of Co-location

Appendix

1. North Island Sites we missed
2. Econet's Journey

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

North Island Sites we missed

120 Lees Road, Hahei.	Difficult terrain. Unlikely to find given limited daylight hours.
Blagdon Hill, New Plymouth.	Insufficient address information provided.
Flaxmill Bay Road, Whitianga.	Insufficient address information provided. Road doesn't appear to exist.
Man 'O War Bay Road, Waiheke Island.	Insufficient address information provided.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone

Econet's Journey

- Econet traveled over 4,000km to visit every one of these sites.
- We drove over 1,000km on unsealed, gravel and dirt roads.
- We hit ice several times.
- We walked through driving rain and snowy fields to take these pictures.
- Our car got stuck in the mud several times when driving over muddy access tracks.

- We would much prefer to have been:
 - Building a competitive new network
 - Bringing competitive new products and services to market
 - Fighting Vodafone and Telecom for new customers

- Instead, 5-years after the 2001 Telecommunications Act, we are still fighting for a fair go. We are still fighting just for the right to get started.

Lies, damned lies and ~~statistics~~ Vodafone Submissions

“Co-location” according to Vodafone