



**GOVERNMENT & INDUSTRY RELATIONS**

**Telecom New Zealand Limited**

Level 2, North Tower, Telecom House  
68-86 Jervois Quay, PO Box 570, Wellington  
Telephone: (04) 498 5573  
Facsimile: (04) 473 9190  
Email: bruce.parkes@telecom.co.nz

14 July 2006

Douglas Webb  
Telecommunications Commissioner  
Commerce Commission  
PO Box 2351  
**WELLINGTON**

Dear Douglas

**REVIEW OF DESIGNATED AND SPECIFIED SERVICES UNDER THE  
TELECOMMUNICATIONS ACT 2001: CROSS-SUBMISSIONS IN RELATION TO DRAFT  
REPORT**

1. Telecom appreciates the opportunity to provide cross-submissions in relation to the Commission's investigation into extending regulation of designated and specified services under the Telecommunications Act 2001.
2. Given Telecom's position on the review, we do not intend to comment on Vodafone's and TelstraClear's submissions here other than to note that we do not necessarily agree. Telecom does intend, however, to address particular issues raised in TelstraClear's and Vodafone's submissions regarding 'national roaming' and 'co-location on cellular mobile transmission sites' as part of the Commission's Mobile Services Review. For these reasons we have limited our cross-submissions. Telecom looks forward to commenting in more detail, and updating the Commission on the relevant markets, when the services are reviewed in two years' time.
3. In the draft report the Commission indicated it intended to hold a public conference on 19 July 2006. Subsequently, the Commission asked parties for their view as to whether a conference is necessary and whether they would be likely to attend a conference. In these particular circumstances Telecom does not consider that a conference is necessary.
4. Please feel free to contact me if you wish to discuss any of these matters further.

Yours sincerely

A handwritten signature in blue ink, appearing to be "B. Parkes".

**Bruce Parkes**  
**General Manager**  
**Government & Industry Relations**