

2 October 2006

Osmond Borthwick
Manager, Network Access Group
Commerce Commission
P O Box 2351
WELLINGTON

BY EMAIL

Dear Osmond,

Re: Econet complaint re Vodafone's submission at the Review of Regulated Services Conference

1. Thank you for your letter to Tom Chignell of 25 September. Tom is out of the office and asked me to reply to your letter in his absence.
2. You asked us to clarify whether we still considered that difficulties with co-location tend to be compliance related, given that our 3G/2G co-location ratio is close to the target we specified.
3. Compliance is definitely the issue that most affects the timely delivery of cell sites for Vodafone. As we pointed out in slide 12 of our presentation to the Conference, putting up a cellsite takes us on average 82 weeks. Of this, organising compliance, including RMA and other legislation, council by-laws, and obtaining landlord agreement usually takes about 63 weeks. Although the situation will vary from site to site, co-location generally does not avoid these compliance issues.
4. There are also a range of practical issues about site access, height of antennae, and strength of the existing masts that can lead operators to prefer to have their own masts.
5. Where co-location is in rural areas on large existing structures, these compliance and practical issues are often not as great. A good example of this is in relation to BCL, with whom we currently share 57 masts.
 - BCL usually has large lattice towers that allow us to get plenty of height and to maintain our equipment without interfering with their equipment.
 - These towers are strong, so using our microwave linking is not a problem.
 - BCL often owns the land so there are no landlord problems, and there are fewer RMA concerns as the sites are generally designated under that Act and therefore consents are often not required for adding antennae.

6. I trust that this response addresses your question. If you have any other issues you would like us to address, please email me at hayden.glass@vodafone.com.

Yours sincerely

Vodafone New Zealand Limited

Hayden Glass
Public Policy