



14 November 2007

Commerce Commission
44-52 The Terrace
WELLINGTON

By email: thomas.forster@comcom.govt.nz

VODAFONE AMENDED UNDERTAKINGS

1. We refer to Vodafone's amended co-location and roaming undertakings dated 2 November.
2. We have reviewed those submissions and do not consider that they adequately address concerns raised in our earlier submissions. In particular:

- 2.1. proposed roaming rates continue to be higher than many of Vodafone's retail prices. We have highlighted a number of examples in the past.

Vodafone are now offering unlimited national and local calls for \$35.50 (excl GST). This equates to usage of only 8 minutes a day compared with the proposed roaming rate of 14.8cpm. As we understand it, roaming rates should be "cost based" to some degree (which we would expect to be significantly below a "retail minus" cost). We are unable to reconcile Vodafone's wholesale and retail pricing, and can only assume that their proposed roaming pricing is significantly above cost.

- 2.2. we have focussed in past submissions on the need for a regulatory incentive on Vodafone to welcome co-location rather than obstructing it. The suggested amendments to the co-location undertakings do not address this.
3. We would ask the Commerce Commission to address these concerns during its review of these services.

Yours faithfully

A handwritten signature in black ink that reads "Nick Clarke". The signature is written in a cursive, slightly slanted style.

Nick Clarke
Commercial Manager
Woosh Wireless Limited