

5 November 2003

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Network Access Group
Commerce Commission
P O Box 2351
WELLINGTON

E-mail: telecommunications@comcom.govt.nz

Dear Sir/Madam

**DRAFT DETERMINATION FOR THE TELECOMMUNICATIONS ACT 2001: SECTION 64
REVIEWS INTO UNBUNDLING THE LOCAL LOOP NETWORK AND THE FIXED PUBLIC
DATA NETWORK**

The Canterbury Employers' Chamber of Commerce is a member-based business support agency based in Canterbury. It exists to:

- enhance individual business of its members;
- promote an environment that will allow business to succeed; and
- explore new business opportunities.

The Employers' Chamber is affiliated to Business NZ and fully supports the submission by Business NZ to the Commerce Commission dated 29 October 2003.

This organisation is aware that while being co-joined to Business NZ in context of making submissions to Government, it is often over-looked that a significant part of the South Island business community is represented by the Employers' Chamber. In relation to the submission in question, we note that in the central business district of Christchurch we enjoy some of the most wired network in the world, with telecommunication operators, such as Telecom and Telstra having rolled out their own alternative networks and WOOSH and BCL are in the process of doing so.

It is important that there continues to be incentives for these competing providers to continue to invest in developing infrastructure, over and above that that the current market already provides. We are not convinced that local loop unbundling will assist in this process.

The Employers' Chamber also strongly supports public policy that is in the long term interests of all people, and not the short term interest of some. In this context we believe that any decision made in the context of local loop unbundling must take into account what is best for New Zealand as a whole and its consumers. We must be very careful that we do not count short-term gains to customers and underestimate the longer terms effects and cost of having an open, effective, competitive telecommunication infrastructure, which is not relevant on old technologies.

Yours sincerely


Peter R. Townsend
CHIEF EXECUTIVE



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AND INDUSTRY