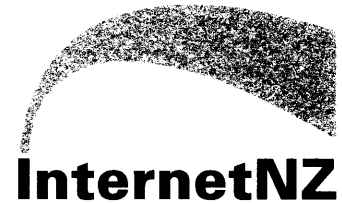


October 27 2003



The Manager  
Network Access Group  
Commerce Commission  
PO Box 2351  
Wellington  
Attn: Mr Alex Cheetham

30 OCT 2003

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Dear Mr Cheetham,

### **Unbundling the Local Loop Network and Fixed Public Data Network**

InternetNZ strongly supports unbundling the local loop. The provision of broadband for all is a key foundation in our quest to ensure that the Internet is open and uncapturable.

We believe that New Zealand has lost ground by failing to provide a competitive environment for provision of broadband for home, SME and other organisational users. Considering the fact that more than 70% of New Zealanders have access to the Internet, the low uptake (13,000 lines at September 2003), and the 23<sup>rd</sup> placing in the OECD rankings is a cause for serious concern. Failure in uptake of broadband will reflect in poor competitive performance by the New Zealand economy in the near future.

The contention that wireless broadband is fully competitive with copper is not valid. The growing wireless broadband market overlaps with the local loop broadband capability, and should be regarded as supplementary.

InternetNZ has created a small equivalent of local loop unbundling in the domain name market, by opening the market to a number of registrars, and wishes to share this experience, especially as the outcome has been an unqualified success.

InternetNZ looks forward to a rapid release of the local loop to effective competition, and offers its support to the decision and the subsequent processes.

Yours Sincerely

Keith Davidson  
President  
InternetNZ