

North Shore City Council

File Utilities-Telecommunications
Ref:

28 October 2003

Unbundling Draft Report
Network Access Group
Commerce Commission
Fax 04 471 0771
PO Box 2351
WELLINGTON

Dear Sir/Madam

Telecommunications Act 2001 - Local Loop Unbundling – Regulation

North Shore City Council has considered the matter of local loop unbundling which is addressed in detail in your draft report of 18 September 2003 (and revised report of 14 October 2003).

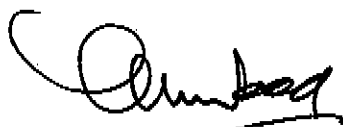
The Council has not embarked on a detailed investigation of LLU. This would involve a highly technical analysis and understanding of complex electrical engineering and economic considerations. Council has not considered it necessary to have a complete technical understanding in order to form a view on the matter.

The Council's Strategy and Finance Committee heard brief presentations from senior representatives of both Telecom and TelstraClear at its meeting of 14 October 2003, and the same questions were put to and answered by both representatives at this meeting.

Council is strongly of the view that unbundling should be regulated and accordingly supports the Commission's recommendations. Council believes that unbundling will facilitate the achievement of a more efficient telecommunications industry, that will in turn more quickly deliver on the North Shore community's expectations for fast or 'broadband' telecommunications services. North Shore City has a high incidence of household use of electronic communications devices, and the Council believes that unbundling will promote competition, diversify services offered, reduce prices, and in time deliver interrelated quality of life and economic benefits, with little or no environmental effects.

The Council does not wish to be heard in connection with this submission.

Yours sincerely



George Wood, Mayor

Tony Holman, Chairperson
Strategy and Finance Committee

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