



Vodafone New Zealand Limited

v.nue, 20 Viaduct Harbour
Private Bag 9 2161
Auckland, New Zealand

Reception +64-9-355 2000
Facsimile +64-9-355 2006

23 December 2005

Anthony Morris
Commerce Commission
PO Box 2351
WELLINGTON

Dear Anthony,

Mobile Termination Reconsideration Draft Report

I refer to the Commerce Commission's Mobile Termination Reconsideration draft report dated 22 December 2005.

I am writing to request an extension of the closing date for written submissions on the draft report, which is presently 31 January 2006.

The draft report has arrived after a number of the key Vodafone staff and advisers who would work on the response have left for the Christmas break, and many of these people will not be returning to work until 16 January (and some after that date).

Many of these same people will be involved in the Vodafone response to the Commission's 2003/04 TSO draft determination that came out today, and on which submissions are due on 3 February (the same week as the due date for MTR submissions).

We appreciate that the Commission is keen to bring its investigation on termination rates quickly to a close. But we believe that the Commission's process is unreasonable in that, given the time of year and the pressure of other Commission deadlines, it does not give Vodafone sufficient time to provide a full response to the draft report.

As you know, the issues raised in the MTR investigation are of critical significance to Vodafone, especially the recently proposed regulation of our new 3G network. We request an extension of the closing date for written submissions on the draft report for a further week or two weeks until 7 or 14 February 2006.

I look forward to hearing from you.

Yours sincerely,

Hayden Glass
Public Policy