



18th May 2005

The Telecommunications Commissioner
The Commerce Commission
P O Box 2351
Wellington

Attention : Douglas Webb

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Dear Sir,

RE: Submission – Revised Mobile Termination Service Description

WorldxChange has prepared this brief response to the revised Mobile Termination Service Description.

Responses to questions:

Question 1:

Will the service description achieve the effect of regulating the termination of 2G voice calls while excluding from regulation all 3G voice calls? If not, why not?

If the intention of the Commission is to ensure that all voice calls that terminate to either 2G or 3G mobile handsets via the voice channel are to be included in the service description and all voice calls that terminate to 3G handsets via IP over the data channel are to be excluded from the service description, then we agree with the intention of the revised Mobile Termination Service Description.

However, as the distinction between what will and won't be regulated seems to rely solely on the term "voice air interface" then we believe that this term needs to be spelt out in greater detail as it is presently fairly ambiguous.

Question 2:

Could the service description be improved? If so, how ?

Yes.

We would like to see a more specific description along the lines of a full technical description of the actual channels available on a 3G network and associated handsets – ie a specific voice channel for the delivery of audio calls and a data control channel for the delivery of enhanced voice and/or data services via the IP protocol etc.

Once the actual capabilities are spelled out in detail, the Commission would be in a better position to explicitly identify what services will be included in any subsequent determination on Mobile Termination.

Regards,

Paul Clarkin
Director, Operations & Carrier
WorldxChange Communications Limited