

# SUBMISSION

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Submission on: Revised undertakings on mobile termination access services

From: Federated Farmers of New Zealand

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**SUBMISSION TO THE COMMERCE COMMISSION ON:  
THE REVISED UNDERTAKINGS ON MOBILE TERMINATION ACCESS SERVICES**

**1. INTRODUCTION**

- 1.1 Federated Farmers welcomes the opportunity to comment on the revised undertakings on mobile termination access services.
- 1.2 Federated Farmers has a vital interest in ensuring reliable supplies of telecommunications and other utility services are supplied to rural consumers at reasonable prices. Our interest in telecommunications is illustrated by the large number of submissions and other engagement the organisation has had with Government at all levels.
- 1.3 Federated Farmers is part of the “Drop the Rate, Mate!” campaign. This a public campaign launched in August of this year to support the Commerce Commission’s draft recommendation to regulate mobile termination access services (**MTAS**).

**2. RECOMMENDATIONS**

- 2.1 *Federated Farmers endorses the submission of the Drop the Rate, Mate! campaign.***
- 2.2 *Federated Farmers recommends that the Commission reject the current undertakings put forward by Vodafone and Telecom.***
- 2.3 *Federated Farmers requests that the Commerce Commission recommend that the Minister regulate MTAS.***

**3. ABOUT FEDERATED FARMERS**

- 3.1 Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers.
- 3.2 The Federation aims to add value to its members’ farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- Our members may operate their business in a fair and flexible commercial environment;
  - Our members' families and their staff have access to services essential to the needs of the rural community; and
  - Our members adopt responsible management and environmental practices.