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**From:** Michael Wigley [mailto:michael.wigley@wigleylaw.com]  
**Sent:** Monday, 27 July 2009 5:04 p.m.  
**To:** Jonathan HOPE; Airihi.Mahuika@telecom.co.nz; ken.ginn@mgfwebb.com;  
Paul.Mathewson@minterellison.co.nz  
**Cc:** Shane Kinley  
**Subject:** Submission by Woosh, CallPlus and Kordia as to treatment of confidential information:  
Commission request of 21 July 2009

This email deals with your 21 July request, as opposed to the 22 July request.

As Nominated Counsel the position is unusual as the Commission already has the information.

Additionally, it is unusual as the Commission is considering submissions which I, as nominated counsel, would wish to see before certifying. (Ideally I would also see the Commission's decision on those points before certifying).

Therefore the best approach is to indicate an initial view on appropriate treatment.

Our clients (Woosh, Kordia and CallPlus) would have their information treated as RI, with one exception.

That exception is the names of carriers with which our clients have agreements. Tentatively, this would be COI. This is sensitive commercial information as it is effectively a client list which can be targeted. Therefore greater confidentiality than RI is appropriate.

Having noted that, the solution proposed in our letter of today's date, relating to appointment of separate counsel by Vodafone and Telecom to handle information, would enable treatment as RI.

Regards

Michael

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