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**RE: Consultation on Commerce Commission Telecommunications Sector Monitoring**

Unfortunately CallPlus has been unable to make detailed comments on the Commissions questions with respect to Telecommunications Sector Monitoring. In the timeframe available we have been unable to give the matter sufficient consideration, however this is not indicative of the importance with which we view the monitoring function. Accordingly we wanted to note our support of a continuation and expansion of monitoring activity as critical in the modern regulatory environment. In particular:

- CallPlus strongly supports a continuation of the Commerce Commissions quarterly and annual reporting. Statistics are critical to monitor the state of competition in the market and our effectiveness relative to other geographies. Furthermore they help to focus regulatory attention where needed.
- Given the rapidly changing telecommunications sector information is required on a regular and ongoing basis in order that problems are identified quickly trends are understood.
- OECD benchmarking is vital to monitoring our competitiveness as a country. To attract overseas investment and to ensure international competitiveness we need to improve our performance in key telecommunications services relative to other countries.
- In the mobile market Vodafone, given their dominant position, should also be required to make relevant disclosures in a similar manner to Telecom.
- Consideration should be given to more focus on the practices of bundling and on-net pricing as the prevalence of these is rapidly increasing in the market. More specific information on the level of these practices and the impact is required.

In summary, given the complexity of the telecommunications environment and the criticality to our economy CallPlus supports, and uses, the Commissions monitoring information. Most importantly it highlights market failures. Prior to the Commission



undertaking a monitoring function the incumbents were the only ones able to monitor the true picture and, understandably, the information was used selectively to maintain the status quo.

Thank you for the opportunity to make this submission. For further information please contact:

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