

7 April 2005

Chris Abbott
Commerce Commission
PO Box 2531
Wellington

BY EMAIL

Dear Chris

Number Portability Functions and Standards: Termination of International SMS

We refer to Telecom's letter to you dated 30 March 2005, in which Telecom provides further comments on Vodafone's recent submissions on the issue of the appropriate process for terminating international SMS messages.

We don't think it was appropriate for Telecom to provide further comments prior to the Draft Determination, when cross-submissions have not been called for.

Further, we are strongly of the view that Telecom is simply endeavouring to leverage off Vodafone's agreements with international operators, which is not appropriate. Vodafone will be meeting with Telecom's technical team next week and we hope that we will see some progress on this issue at that meeting.

Please let us know if you would like to receive our views on the comments Telecom has made prior to issuing the Draft Determination.

Yours sincerely
Vodafone New Zealand Limited



Celine Hugues
Commercial Advisor
Service Interoperability