



7 February 2005

Number Portability  
Commerce Commission  
PO Box 2351  
WELLINGTON NZ

Attention: Chris Abbott

By Email: [chris.abbott@comcom.govt.nz](mailto:chris.abbott@comcom.govt.nz)

Dear Chris

#### **ALLOCATION OF COST OF DELIVERING NUMBER PORTABILITY**

Woosh considers the introduction of number portability, of the current regulatory issues, as the one most key to creating a competitive voice services market.

We support the conclusions of the Commission with respect to each of the four elements of cost.

With respect to per line set-up costs we believe it is appropriate, to avoid the likelihood of further delay in requiring agreement between the industry members, for the Commission to set these rates in the Final Determination.

Those rates should, we believe, reflect the following considerations:

- International experience has shown that lower rates has increased the success of number portability
- It is in the best long-term interest of end users to reduce, as far as practical, the barriers customers face when considering changing operators.
- To set the right incentives, rates must be reciprocal between operators
- To best achieve the purposes of the Act, the Commission should, in setting the charges, err on the side of being below, rather than above, cost.

With this in mind we believe, that it would be appropriate to set the per-line set-up charges at "nil" or, if charges are to apply, a maximum of \$10 should be set to avoid raising an unnecessary hurdle in consumers' minds when considering changing suppliers.

Yours faithfully  
**For Woosh Wireless Limited**

Nick Clarke  
Commercial & Legal Manager