



14th September 2005

The Telecommunications Commissioner
The Commerce Commission
P O Box 2351
Wellington

Attention : Douglas Webb
Copy: Paul Armstrong

**WorldxChange
Communications Limited**

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Dear Douglas,

RE: Change of eligibility status under Decision 554

After reviewing the recent final determination on Number Portability, WorldxChange became aware of the requirement to notify the Commission if any company's eligibility status was to change under Decision 554.

We believe that the eligibility status of at least four service providers has changed since the Commission's initial snapshot of the industry was undertaken and request that the Commission revisit this issue immediately in view of the pending cost allocation calculations related to the IPMS system.

WorldxChange is one of the providers whose status has changed for both fixed and mobile eligibility.

WorldxChange now has its own local number service that is live on the PSTN and we are no longer exclusively using TelstraClear's reassigned number ranges in our network. We are therefore still both an access-seeker and an access-provider of local services.

According to the final determination, the 027x number range currently allocated to WorldxChange is deemed to be a "Mobile Number" for the purposes of mobile portability.

This 027x Non-Geographic number range is live within the Telecom fixed PSTN as well as the Telecom Mobile network

WorldxChange is using this number range to provide mobile (as in non-fixed) services throughout New Zealand via a number of different wireless technologies.

We therefore believe that we now qualify as both an access-seeker and access-provider of mobile telephone services and request that the Commission formally changes our status to reflect that we seek access to the mobile number portability service under this determination.

Please advise if/when these changes will take effect as they will impact the cost allocation calculation methodology.

Regards,

Paul Clarkin
Director, Operations & Carrier
WorldxChange Communications Limited