

10 June 2005

Chris Abbott
Chief Advisor
Network Access
Commerce Commission
PO Box 2351
WELLINGTON

Dear Chris

Telecom, TelstraClear, Vodafone and WorldxChange joint submission in response to the Number portability Functions & Standards Draft Determination

We refer to the Commission's Number Portability Functions & Standards Draft Determination of 12 May 2005 ("**Draft Determination**"), incorporating the LMNP and Network Terms. As members of the Telecommunications Carriers' Forum Working Parties that prepared the Draft LMNP and Network Codes, on which the Commission has based its Draft LMNP and Network Terms, Telecom, TelstraClear, Vodafone and WorldxChange ("**the Parties**") have agreed to submit:

- A joint submission on those changes made by the Commission to the Draft LMNP and Network Codes which the parties have common views on; and
- Separate submissions on all other issues.

Many of the changes proposed by the Commission to the LMNP and Network Terms are of a technical nature, and could have unintended consequences for Access Seekers, Access Providers and the design and operation of the IPMS. Where this is the case, the Parties have endeavoured in the attached submission to:

- Propose an amendment to the relevant clauses of the LMNP or Network Terms which avoids any adverse unintended consequences; and
- Provide an explanation to the Commission of the Parties' concern and the rationale behind the suggested amendment.

We would be happy to meet with the Commission together to discuss any of the issues raised or amendments proposed in this joint submission. If the Commission is minded not to accept the suggested changes, or to propose variants of them, the parties would request that the Commission consult with them jointly or with the TCF number portability working parties to discuss the issues further.

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