



DETAILED SUBMISSIONS ON THE SERVICE DESCRIPTION

SECTION/CLAUSE of the VODAFONESTP	COMMENT
<p>General Comments</p> <p>Please note that the numbering used in this submission corresponds to the numbering in the Vodafone Mobile Co-location STP Service Description.</p>	<p>Telecom supports Vodafone's Service Description for the Mobile Co-location Service. The Mobile Co-location Service Description should focus on the nature of the service. The Service Description should not cover operational matters and processes used to deliver the service. These processes are dealt with by other Schedules of the Mobile Co-location Terms, including the Mobile Co-location Operations Manual and the Mobile Co-location Interference Management Plan.</p>
<p>1 The Mobile Co-location Service</p>	<p>The Mobile Co-location Service is subject to the availability of space, interference restrictions and capacity restrictions within and associated with the Relevant Facilities. A new clause 1.4 should be inserted into the Mobile Co-location Service Description to reflect these restrictions:</p> <p style="padding-left: 40px;">1.4 The Mobile Co-location Service depends on availability of space and capacity, and compliance with interference limitations at Relevant Facilities.</p> <p>This clause is consistent with the limits on the Access Principles set out in the Telecommunications Act 2001, the amendment made to clause 7.3 of the Mobile Co-location Operations Manual and the Mobile Co-location Interference Management and Design document. The Mobile Co-location Service cannot be provided if these conditions are not satisfied.</p>
<p>2 Relevant Facilities</p>	
<p>3 Mobile Co-location Service Assistance</p>	<p>Section 3 is broadly consistent with what was agreed in the TCF.</p> <p>The following changes should be made to the Mobile Co-location Service Description in order for it to be consistent with Telecom's proposed changes to other documents in the Standard Terms Proposal:</p> <ul style="list-style-type: none"> • the phrase "if required" should be inserted at the end of sub-clause 3.1.4; • sub-clauses 3.1.5 and 3.1.6 should refer to the "Preliminary Site Approval" rather than the "Conditional Site Approval"; and • sub-clause 3.1.7 should refer to a "Preliminary Notice". <p>Telecom supports sub-clause 3.1.6. Both the Access Seeker and the Access Provider have obligations in order for the Mobile Co-location Service to be supplied. The Access Seeker and Access Provider should be responsible for the parts of the process that they can control. This will facilitate the efficient and timely delivery of the Mobile Co-location Service.</p>

SECTION/CLAUSE of the VODAFONESTP	COMMENT
<p>4 Mobile Co-location Service Exclusions</p>	<p>Telecom agrees with Vodafone's drafting in sub-clause 4.1.4 of the Mobile Co-location Service Description which, as agreed in the TCF, does not include the words "to be used" because:</p> <ul style="list-style-type: none"> • The Greenfields process agreed in the TCF and included in the Mobile Co-location Operations Manual deals with future services. • In any event, Access Providers have incentives to use all the Relevant Facilities they build because acquiring suitable suits is time consuming and expensive. <p>The exclusion of the phrase "to be used" from sub-clause 4.1.5 of the Mobile Co-location Service Description was not agreed by the TCF. Telecom agrees with Vodafone's drafting that excludes the phrase "to be used" because:</p> <ul style="list-style-type: none"> • The specification of mobile co-location in Schedule 1 of the Telecommunications Act 2001 specifically refers to existing facilities only. • The Access Seeker should not be able to reserve space at Relevant Facilities under the Mobile Co-location Terms for equipment it may use in the future. This would be unfair for Access Providers and other Access Seekers. <p>The other provisions of section 4 are consistent with what was agreed in the TCF.</p>
<p>Appendix A</p>	<p>Appendix A provides an indicative diagram of the Mobile Co-location Service. The TCF agreed that a diagram should be included in the Mobile Co-location Service Description. However, the TCF did not consider a specific diagram.</p> <p>The diagram provided in Appendix A does not show all possible co-location options. Three diagrams should be included:</p> <ul style="list-style-type: none"> • A diagram showing the Access Seeker with its own building within the Relevant Occupation (the Access Seeker and Access Provider may share utilities). • A diagram showing the Access Seeker and Access Provider sharing a building and utility services within the Relevant Occupation; and • A Diagram showing the Access Seeker with its own building outside the Relevant Occupation (the Access Seeker and Access provider may share utilities). <p>The diagrams proposed are indicative and show a range of options for the delivery of the Mobile Co-location Service.</p> <p>These diagrams should also be included in the Mobile Co-location Operations Manual. This is consistent with other Standard Terms Determinations.</p>

TELECOM MARKUP OF THE VODAFONE
STANDARD TERMS FOR THE CO-LOCATION ON
CELLULAR MOBILE TRANSMISSION SITES
SERVICE

SCHEDULE 1
CO-LOCATION ON CELLULAR MOBILE
TRANSMISSION SITES SERVICE DESCRIPTION
PUBLIC VERSION

~~28 April 2008~~ 23 May 2008

Table of contents

1	The Mobile Co-location Service.....	1
2	Relevant Facilities	1
3	Mobile Co-location Service Assistance.....	1
4	Mobile Co-location Service Exclusions.....	2
	Appendix A.....	3

1 The Mobile Co-location Service

- 1.1 References to clauses or sections are references to clauses or sections in this Co-location on Cellular Mobile Transmission Sites Service Description (**Mobile Co-location Service Description**) unless expressly provided otherwise. Defined terms are denoted by the use of capital letters. The definitions set out in this Mobile Co-location Service Description apply to the extent that they are not expressly modified by or inconsistent with the definitions set out in the Mobile Co-location Terms, otherwise the definitions set out in the Mobile Co-location Terms shall apply.
- 1.2 The Mobile Co-location Service is a service that enables the co-location of Access Seeker Equipment on or with the Relevant Facilities.

~~1.3~~ ~~An illustrative diagrams~~ of the Mobile Co-location Service ~~is~~ are attached as Appendix A.

~~4.31.4~~ The Mobile Co-location Service depends on availability of space and capacity, and compliance with interference limitations at Relevant Facilities.

2 Relevant Facilities

- 2.1 The Relevant Facilities which are able to be co-located are defined and described in clause 1 of the Mobile Co-location General Terms.

3 Mobile Co-location Service Assistance

- 3.1 Mobile Co-location Service assistance provided by the Access Provider to enable the provision of the Mobile Co-location Service is as follows, all to be provided in accordance with the Mobile Co-location Operations Manual:
- 3.1.1 to enable access by the Access Seeker to a Common Format Database to include the Standard Site Types;
- 3.1.2 to provide a Provisioning System to enable the Access Seeker to make Applications in relation to the Mobile Co-location Service;
- 3.1.3 to provide a Site Data Pack in response to a Site Data Pack Application in order to assist the Access Seeker to assess the suitability of a Relevant Facility for the Mobile Co-location Service;
- 3.1.4 to participate in a Detailed Site Design Visit in order to provide the Access Seeker with additional information in advance of providing a Full Site Application if required;
- 3.1.5 to assess a Full Site Application and, if approved, to issue the ~~Conditional-Preliminary~~ Site Approval;
- 3.1.6 to provide the Access Seeker with reasonable assistance if reasonably requested by the Access Seeker for the purpose of fulfilling the conditions in the ~~Conditional-Preliminary~~ Site Approval;
- 3.1.7 to assess the Access Seeker's ~~Conditional-Preliminary~~ Notice and, if approved, to issue the Final Site Approval; and
- 3.1.8 to assess the Project Plan submitted by the Access Seeker and, if approved, to issue the Approval to Build.

4 Mobile Co-location Service Exclusions

- 4.1 The Mobile Co-location Service specifically excludes, without limitation:
- 4.1.1 housing of Access Seeker Equipment (including any necessary supporting equipment) that is not approved by the Access Provider in accordance with the Mobile Co-location Operations Manual, the Mobile Co-location General Terms, and the Mobile Co-location Access Terms;
 - 4.1.2 co-location in relation to the unbundled copper local loop (UCLL) service;
 - 4.1.3 backhaul service;
 - 4.1.4 access to any part of the Access Provider's network that is not used by the Access Provider in association with its Cellular Mobile Telephone Network;
 - 4.1.5 housing of Access Seeker Equipment that is not used to support a Cellular Mobile Telephone Network; and
 - 4.1.6 the location of Access Seeker Equipment in proximity to an Access Provider's Site (colloquially referred to as "co-siting") in a manner which does not otherwise come within the definition of the Mobile Co-location Service in this Schedule 1.

Appendix A

Illustrative diagram of the Mobile Co-location Service

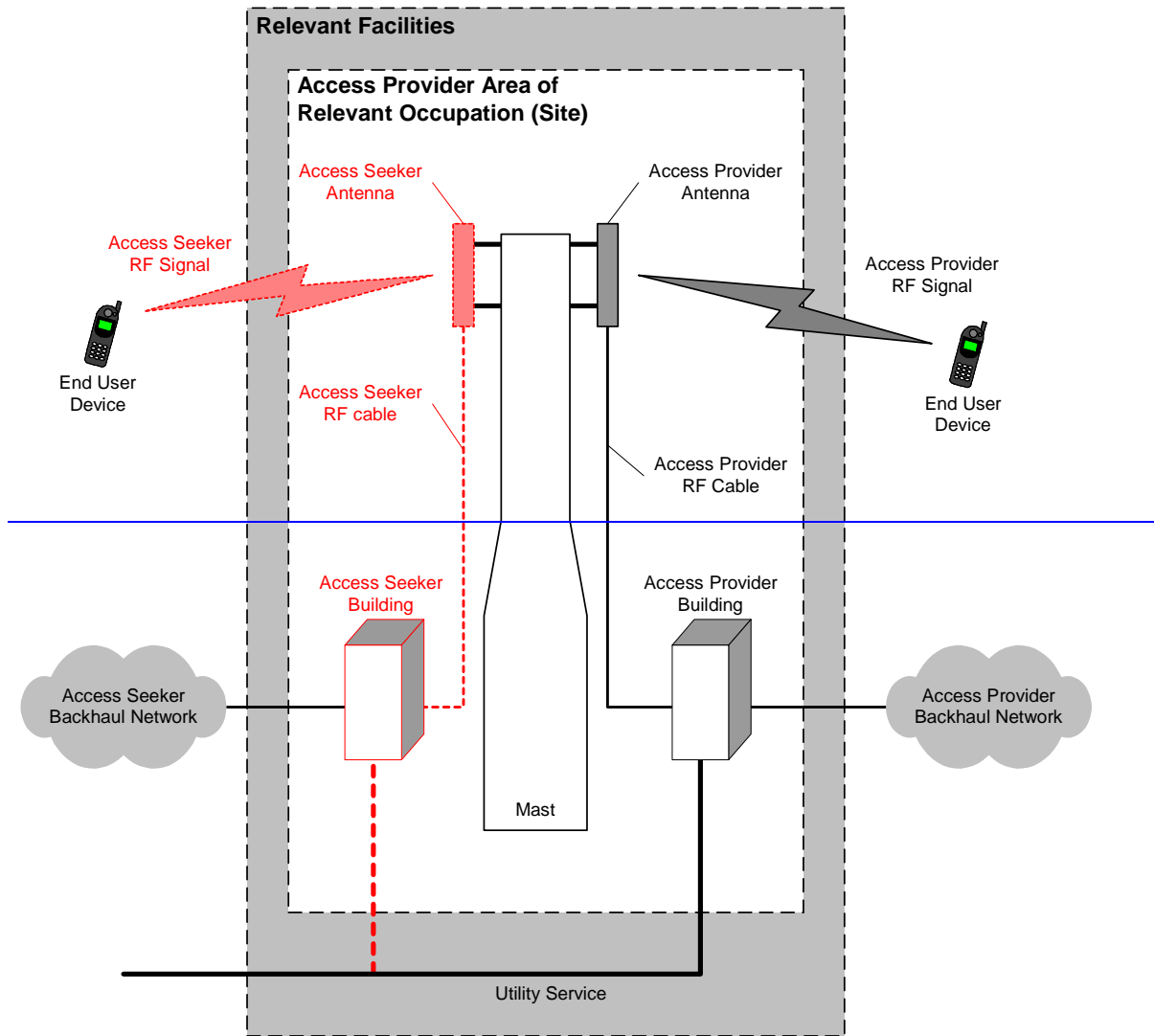


Diagram (a) – Access Seeker uses own utility services

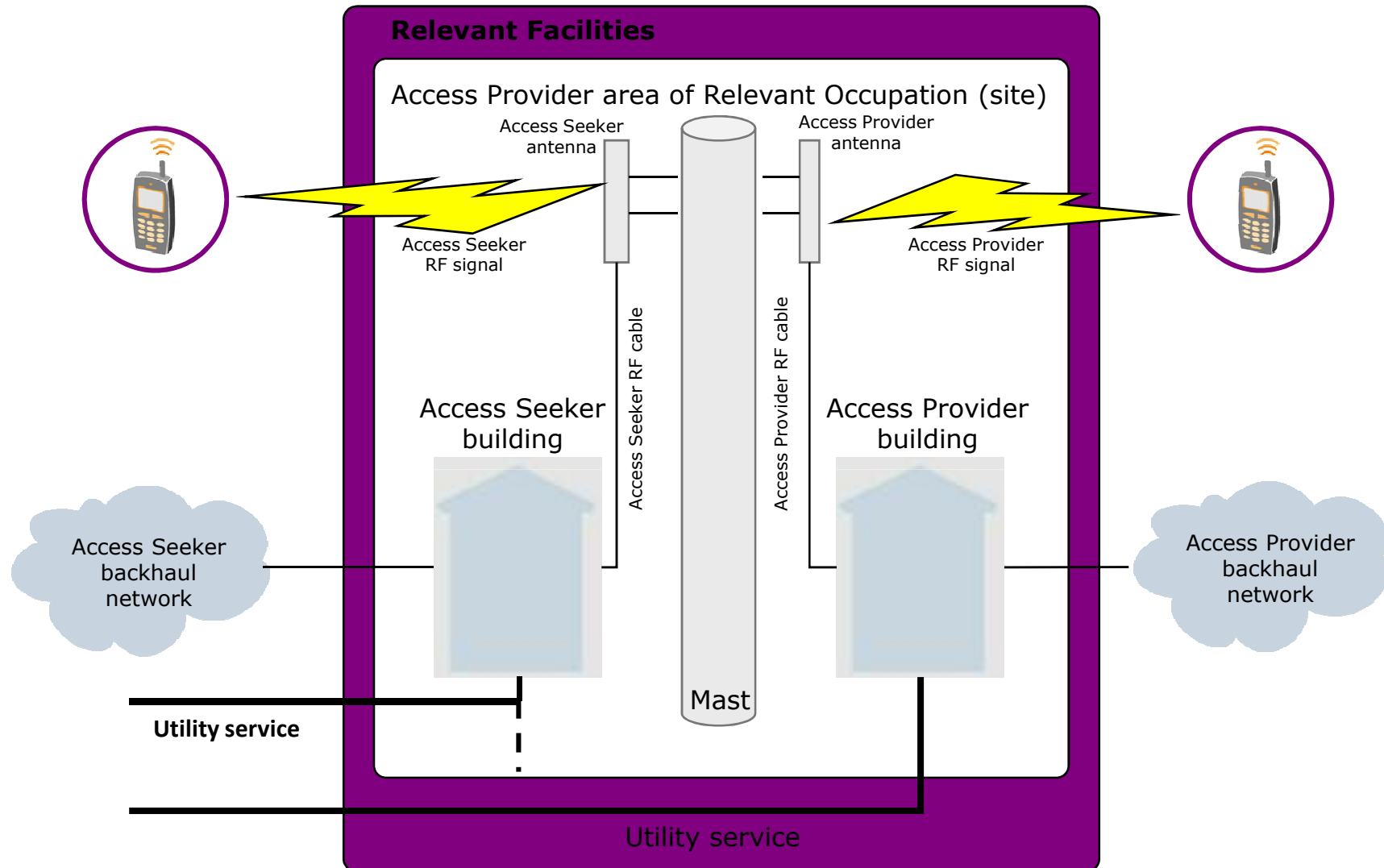


Diagram (b) – Access Seeker equipment housed within Access Provider structure

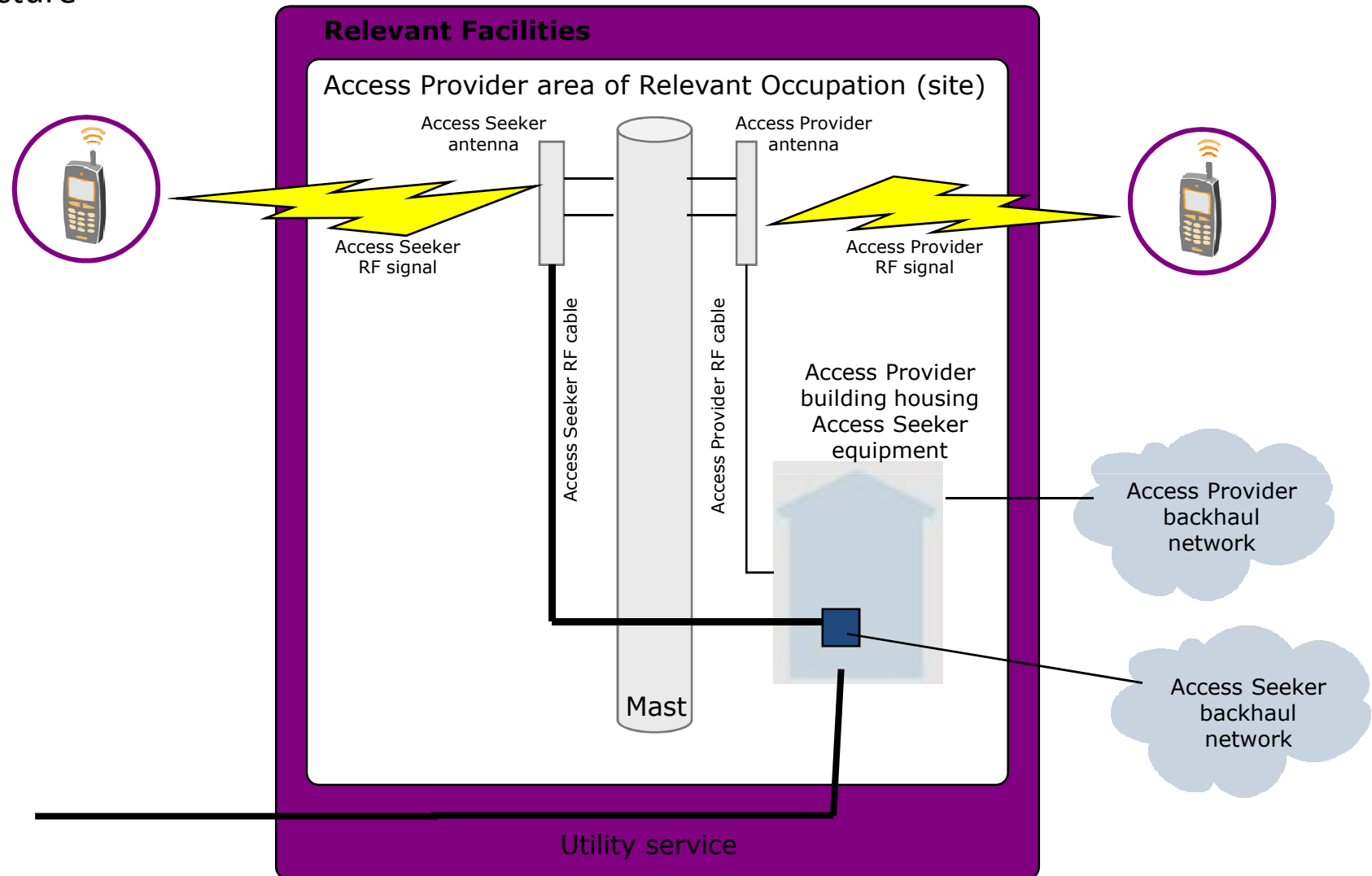


Diagram (c) – Access Seeker building outside of Access Provider site

