

TeamTalk Ltd
84 Tory Street
P.O. Box 9345
WELLINGTON



Phone 0800 101900
DDI: 04 802 1495
Fax: 04 802 1490

8 September 2008

Commerce Commission
Attention Tom Forster
P.O. Box 2351
WELLINGTON 6140

Dear Sir,

Cross Submission on Draft Standard Terms Determination for the specified service Co-location on cellular mobile transmission sites

The various submissions have been studied and the following cross submission is made;


1. In their submission, Vodafone have assumed that “Antenna solely dedicated to the provision of Emergency Services” (ref 3rd bullet point of Clause 242 of the Draft Terms) is an antenna on a cellular system in which calls can be made by cellular handset to an Emergency Service. This is understandable given that the definition of Antenna describes it as being in a cellular telephone network.

However, we had assumed that the reference to an antenna solely dedicated to the provision of Emergency Services referred to antenna that was supporting services operated by Emergency Services. Clearly, no Emergency Service operates a cellular network. We therefore support Telecom’s submission that the phrase “in a Cellular Mobile Telephone Network” be removed from the definition of Antenna in the General Terms.

2. TeamTalk also supports Telecom’s submission that the definition of Existing Co-locator should be: "means any other Access Seeker and any other third party who has installed and operates equipment on or with the Relevant Facilities." There are many other services presently co-located on masts and structures supporting cellular antennas and these services need effective protection.
3. The definition of Emergency Services needs to be widened as there are other parties, not listed, that also provide emergency services. These would include Ambulance NZ, Civil Defence, NZ Surf Lifesaving, Coastguard, Maritime Safety, just to name a few.

4. It needs to be recognized that some Emergency Services radio networks are actually operated by commercial operators such as TeamTalk and these services also require protection. TeamTalk provides radio network service for Ambulance NZ, some services for the NZ Fire service and services for private security companies, all relying on the performance of the network for safety purposes. The level of loss experienced by Emergency Services and other commercial operators should be changed to 0.5dB from the present proposed 0.2dB (ref clause 6.2.1(c) of Schedule5).
5. TeamTalk supports the submissions of both Telecom and Vodafone that the Unacceptable Performance Degradation should not be greater than 0.5 dB for all co-location requests by Access Seekers because of the Performance Degradation in terms of coverage and data speed that any losses above this threshold would cause. (ref clause 6.2.1(b) of Schedule5). Telecom's proposed change to clause 6.2.1(b) is supported.

Yours Faithfully,

A handwritten signature in black ink that reads "Bruce Harding". The signature is written in a cursive, flowing style.

Bruce Harding
Chief Technology Officer
TeamTalk Ltd.