



17 October 2008

Tom Forster
Commerce Commission
44-52 The Terrace
PO Box 2351
Wellington

Dear Tom

Review of the Concept Economics paper "Incentives for mobile co-location in New Zealand"

Thank you for the opportunity to comment on the concept economics paper "incentives for mobile co-location provision in New Zealand."

Telecom has reviewed the paper and has decided not to comment on it on the basis that it is not relevant to any of the issues that were being discussed at the mobile co-location conference. Telecom's understanding is that the conference was about finalising the terms and conditions of supply of the regulated mobile co-location service and yet the Concept Economics paper focuses on the potential uses for regulation of the National Roaming service, and re-examining the question of whether and why mobile co-location should be regulated. Telecom does not consider the paper adds anything to the questions of service design which were canvassed by the Commission at the conference, such as what level of allowable interference best meets the Telecommunications Act 2001 s18 purpose statement.

If the Commission does want comments from Telecom on the merits or otherwise of regulation of National Roaming, or Mobile co-location more generally, Telecom would be happy to provide it. If this is the case however Telecom would ask that the Commission provide some indication of how it is to be used to assist Telecom with its analysis.

Please contact me if you have any further questions.

Yours sincerely

A handwritten signature in blue ink, appearing to read "JWS", is written over a light blue rectangular background.

John Wesley-Smith
Head of Regulatory Affairs