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Monday, 10 May 2010

Tom Forster
Manager – Telecommunications Operations
Commerce Commission
Wellington

By email: tom.forster@comcom.govt.nz

PUBLIC VERSION

Dear Tom,

Re: MTAS investigation –information regarding new retail plans

Thank you for your letter of 6 May in which you sought some additional information on our You Choose Your Time 200 add-on.

In response to your questions I can inform you that:

- [] **VZNRI** You Choose customers had the Your Time 200 add-on as at 6 May.
- We had [] **VNZRI** customers on You Choose, [] **VNZRI** customers on non-business On Account plans, and [] **VNZRI** customers on all On Account plans as at 30 April.

We are still working on determining the average bundle usage by customers with this add-on. As I have mentioned to Shane Kinley, this information is not part of our standard reporting and therefore requires some additional effort to retrieve. I will send it your way once it is available.

As I mentioned in my email, I am not clear on why the Commission wants this information or what it intends to use it for. We are providing this information only for the purposes of assisting the Commission's analysis for its reconsideration draft report.

I want to make one further comment. With the release of Telecom's results last week, we can confirm our previous estimates of 2degrees' market share as at least [] **VNZAPI**.¹ The 2degrees customer figure does not count 2degrees customers who only call or text on-net, or cross-net only to

¹ Telecom reported 1.407m prepay customers as at 31 March, and Vodafone's equivalent is [] **VNZRI**.

Telecom - only customers who have interacted with the Vodafone network are counted. Adding 20% to 2degrees' customer count to reflect those customers gives a prepay market share of just over [] VNZAPI.²

Feel free to contact me either by email on hayden.glass@vodafone.com or by phone on 021 689 176 should you wish to discuss this further.

Yours sincerely,



Hayden Glass
Public Policy
Vodafone New Zealand Limited

² In our experience between [] VNZRI and [] VNZRI of our prepay customers only call/text other Vodafone mobiles. The difference between these two figures depends on whether the denominator is just based on domestic mobile use, or whether it counts all usage (domestic mobile, domestic landline, and international).