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TelstraClear Bitstream Application – Statement for Consultation
Commerce Commission
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WELLINGTON

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Submission on the TelstraClear Bitstream Application - Statement for Consultation

Rural Women New Zealand (RWNZ) is the leading rural women's organisation in New Zealand. We represent the interests of approximately 4000 members from more than 250 branches from North Cape to the Bluff. Since 1925 we have been providing rural women with a national voice on rural issues and a local framework for social and educational opportunities.

RWNZ provides the following submission in response to the Commerce Commission's Statement for Consultation on the Bitstream Application by TelstraClear.

RWNZ recognises that access to broadband is important not only for the productivity and competitiveness of New Zealand businesses globally but also as an important tool for the development and education of both New Zealand's workers and children.

Sustainable rural communities are crucial to the overall success of New Zealand. Initiatives such as the government's Project Probe have seen broadband access provided not only to New Zealand's rural schools but also the surrounding towns and communities making working and educating at home a possibility.

RWNZ would in general support any move the Commission makes to lower the price and increase the speed of broadband services to New Zealanders, but we have serious concerns that the Commission's Statement of Consultation has inadvertently marginalised the needs of rural communities by effectively cutting off access to broadband services to those already at the outer limits of Telecom's network.

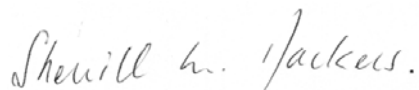
Unconstrained Download Speeds /Reach

It is disappointing to note that the Commission considers that the potential benefits to competition of an unconstrained bitstream service should come at the expense of those that are at the edges of Telecom's network. It is not clear to us how the Commission has made that trade off. The Telecommunications Act talks about the long term interests of end users. RWNZ represents many of those end users. We already face many challenges with dial up internet that is significantly less reliable than that enjoyed by those in the cities. We would be very concerned to see just such a digital divide emerge with broadband.

We are not in a position to comment on the technical issues involved. We understand, however, that there is a significant risk that the overall effect of providing unconstrained broadband speeds will result in reducing the overall reach of broadband services. We are concerned that this will significantly affect more people than the Commission has considered. We do not want to compromise the education of children in rural communities or the efficient operation of agricultural business vital to the New Zealand economy.

We believe that it was not the intention of the Commission to have a detrimental effect on rural communities and RWNZ would therefore strongly urge the Commission to look more closely at the downstream effects their determination will have on rural New Zealanders. Broadband is becoming an essential tool for business and education and it would be disappointing to see the drive for more speed for some New Zealanders override the desire to have reasonable broadband for those on longer copper lines.

Yours faithfully,

A handwritten signature in cursive script that reads "Sherrill Dackers".

Sherrill Dackers
National President