

30<sup>th</sup> September 2010

**Commerce Commission**

44-52 The Terrace  
PO Box 2351  
WELLINGTON - 6140

Attn. Dr Ross Patterson:

**Re: Revised Draft Review - Unbundled Copper Local Loop Backhaul  
Standard Terms Determination**

Dear Ross,

Christchurch City Networks Limited (trading as Enable Networks) is pleased to provide the following response to your above document.

Specifically you have asked for submissions on paragraph 52 in regards to the new framework for assessing 'near entrants' in the UCLL Backhaul market to which this submission will discuss.

Enable Networks experience to date suggests that there is very limited demand for the UCLL Backhaul service in Christchurch and past discussions with potential users of this service have resulted in very poor investment economics with virtually zero up-take.

While it may appear appropriate to simplify the decision criteria in determining whether an exchange has 'limited' or 'not limited' competition to a single measure of distance, this approach does not reflect commercial reality.

Essentially the business case for the investment in providing this service is usually not viable, at best marginally viable, with service providers taking a very short term outlook and partnering to share exchange based equipment thereby limiting backhaul requirements.

Therefore, Enable Networks has no current intentions to provide UCLL Backhaul services at the following exchanges;

Avonhead  
Canterbury Technology Park  
Fendalton  
Islington

Middleton  
Belfast  
Kaiapoi  
Linwood  
Shirely  
St Albans  
Burwood  
Mount Pleasant  
New Brighton  
Sumner

Regards



**STEVE FULLER**  
CEO  
Christchurch City Networks Limited

Ph: 363 2965  
Mob: 021 997 679  
Email: [steve.fuller@enablenetworks.co.nz](mailto:steve.fuller@enablenetworks.co.nz)