



Telecommunications Branch
Commerce Commission
Wellington

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UBA Competition Review: Cross Submission

CallPlus thank the Commission for the opportunity to make this cross-submission. CallPlus would like to briefly make the following points: -

1. Market Share – CallPlus continues to support a market share test based on all broadband lines in the ESA.
2. Product dimension – In our 6th of July joint submission with Kordia Group we noted our concern that the inclusion of cabinetised lines was predicated on Telecoms current practice of not price discriminating between cabinetised and non-cabinetised UBA within an ESA. The Commission in its draft indicated that if the situation changed the Commission would “need to review the market definition and competition under section 30R of the act”. CallPlus’ understanding was that Telecommunications Amendment Act limited the Commissions power for three years from separation date with respect to a s30R review. If this is the case then either an undertaking, or some form of assurance, is required from Telecom or we would have concerns including cabinetised lines for the reasons outlined in our previous submission.

For more information please do not hesitate to contact us:

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