



Serious Broadband

CityLink Limited

Daniel Vincent
Regulation Branch
Commerce Commission
Date 28th September 2010

By email: Daniel.Vincent@comcom.govt.nz

Dear Daniel,

RE: UCLL and UBA Backhaul competition review - Information Request

This letter is CityLink's response to the Commerce Commission's request for information regarding the extent to which CityLink might provide any competitive constraint on Telecom related to UCLL network backhaul.

CityLink does not directly compete in this market area. The nature of our network deployments are effectively focused beyond the UCLL based demands and requirements, for which we are highly regarded for value. Furthermore, in cases where CityLink is within the 1-2km areas of an exchange, the costs for establishing such network links compared to pre-existing Telecom supplied options make it uneconomic for the prospective customers. CityLink has no specific planned intentions to build network extensions into such locations unless there are customers wishing to contract such links based on the standard CityLink installation rates. The CityLink business approach to the construction of its fibre optic network is quite well understood.

In summary, CityLink does not consider itself to be a competitive constraint on Telecom in regards to UCLL backhaul service.

Yours Sincerely,

John Heard

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