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7 July 2010

Daniel Vincent
Commerce Commission
WELLINGTON
By email: telco@comcom.govt.nz

Dear Daniel,

Re: UCLL and UBA Backhaul competition reviews - Information request

This letter is Vodafone's response to the Commerce Commission's (the **Commission**) letter of 2 June 2010 requesting information in the context of the Unbundled Copper Local Loop Backhaul and Unbundled Bitstream Access Backhaul competition reviews (**Information request**).

As a general comment, Vodafone does not have any information to provide that would be relevant to the competition review for the backhaul links. We trust that the Access Provider as well as other Access Seekers will be in a better position to contribute to the review.

However, we would like to reiterate our suggestion regarding a simplified process of backhaul regulation. We refer to our response to the Consultation over the market definition and competition assessment on the 20 April 2010.

In addition, our recent experience shows that some of the latest wholesale prices offered for backhaul links are now lower than the regulated price.

We believe that the initial competition review process has delivered the intended benefits to the Access seekers and that, given the evidences outlined in our response, the time has come to bring some improvements and changes to that process.

Vodafone would welcome further and wider discussion on the proposed approach.

Please feel free to contact me in relation to this submission if any clarification would be helpful.

Yours sincerely,

Celine Hugues
Industry Affairs Manager
Vodafone New Zealand Limited