

4 Aug 2025

Toni Shuker
Manager, Regulatory Rules and Compliance
Telecommunications

New Zealand Commerce Commission
44 The Terrace
Wellington 6011
New Zealand

By email Telecommunications@comcom.govt.nz

Dear Toni,

Re: Support for the Draft Decision on the Review of Local and Cellular Telephone Number Portability Services.

Symbio Holdings welcomes the opportunity to express our support for the Commerce Commission's draft decision that there are no reasonable grounds to commence an investigation into the removal of Local and Mobile Number Portability (LMNP) from Schedule 1 of the Telecommunications Act.

Through our New Zealand operations, Symbio Wholesale NZ Limited and Symbio Networks NZ Limited, we support a wide range of local and international service providers, with a strong focus on the business market. Our services include supplying New Zealand geographic numbers to unified communications-as-a-service (UCaaS) platforms, enabling their users to make and receive calls to and from the NZ Public Switched Telephone Network (PSTN), as well as terminating international voice traffic into New Zealand.

We view LMNP as a fundamental enabler of competition in both fixed and mobile telecommunications markets. The availability of regulated number portability allows end-users to retain their phone numbers when switching providers, thereby reducing the cost, complexity, and disruption of changing service providers. In doing so, it plays a vital role in lowering switching barriers and supporting a competitive environment that benefits end-users through improved service quality, innovation, and pricing.

There are currently no wholesale or retail alternatives to the regulated LMNP services. Without regulation, providers may be incentivised to make porting commercially difficult or costly, creating barriers to switching. This could lead to poorer consumer outcomes and reduced market competitiveness—particularly for new entrants or smaller providers looking to grow.

Removing LMNP regulation could also lead to significant friction for customers, especially those who rely on long-standing numbers for business continuity or identity verification (e.g. two-factor authentication). Porting delays or limitations would create frustration and discourage switching altogether.

We support the Commission's view that the continued regulation of LMNP remains essential to ensure customers can switch providers easily and fairly, and to promote sustainable competition in the telecommunications sector.

Thank you for the opportunity to provide our input.

Sincerely,

Fionola O'Keeffe
Stakeholder Liaison Manager
Symbio Holdings Limited