

PUBLIC VERSION

21 October 2025

Toni Shuker
Manager, Regulatory Rules & Compliance, Telecommunications
Commerce Commission
55 Shortland Street
PO Box 105-222
AUCKLAND 1143

By email: market.regulation@comcom.govt.nz

Dear Toni Shuker,

Commerce Commission Review of the Co-location Specified Services

Thank you for the opportunity to comment on the Commerce Commission's *Review of Co-location on Cellular Mobile Transmission Sites, Draft decision on whether to commence an investigation under clause 1(3) of Schedule 3 of the Telecommunications Act, 23 September 2025* (the 2025 Mobile Co-location Review).

As the Commission is aware, the specified mobile co-location service has been an important regulation, including regulatory backstop to 2degrees commercial negotiations, over time.

2degrees agrees there have been a number of developments impacting this market since the Commission's last review, including that Spark, One NZ and 2degrees have sold tower assets to specialised asset management companies (TowerCos).

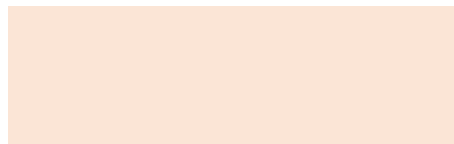
2degrees agrees that if co-location regulation is maintained, the Commission would likely need to investigate amendment of the service description of Mobile Co-location to ensure TowerCos, which now provide the majority of these services to the market, are captured.

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Please let us know if you have any questions regarding this response.

Yours sincerely



Sara Lipanovic
Head of Regulatory

