



Vodafone New Zealand Limited
Corporate Affairs
20 Viaduct Harbour Avenue
Private Bag 92161
Auckland, New Zealand

Reception +64-9-355 2000
Facsimile +64-9-355 2006

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Susan Wells
Forum Administrator
Telecommunications Carriers' Forum
By email: submissions@tcf.org.nz

Submission on Proposed Governance Arrangements for Telecommunications Numbering and Draft Code

Dear Susan,

Vodafone supports the proposed new Governance Arrangements for Numbering and considers them a valuable contribution to industry self-regulation. The new governance structure will certainly help with better management of a scarce resource: numbers.

We anticipate that the implementation phase will pose a few challenges:

1. **Membership:** all NAD members are not currently TCF members and, whilst it makes sense to encourage them to become TCF members, some hesitations can be voiced, especially in relation to the cost of joining the TCF.
2. **Voting:** during the November 2009 workshop, some NAD members voiced some concerns regarding how the TCF Board will vote on the NMG recommendations for changes to the Principles and potential conflicts (Page 8 of the Report: TCF Board can only reject and send the Code back to the NMG if the Board can reasonably establish that the changes would contravene the Principles). The proposed voting rules are fair and consistent with the current regime. We suggest that the TCF Board monitor closely how any changes to numbering Principles proceed and how they are voted on for the first year after the new governance is put in place in order to ensure that there is no conflict between the NMG's role and TCF Board rules.
3. **Financial penalties:** the report makes reference to an enforcement regime where financial penalties would be considered. When needed, all TCF codes include a compliance regime where the "name and shame" principles have always been the preferred option to deal

with potential breaches. From our experience, all TCF members have always been supportive of this compliance regime and we don't see any benefit in moving to a financial penalties regime. In fact, it could even be detrimental to the success of the new governance regime as it will impose additional costs on the numbering members. We encourage the TCF to use the current TCF compliance regime as the risks/benefits analysis does not show substantial benefits from imposing a financial penalties regime.

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

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C. Hugues', with a long horizontal line extending to the right.

Celine Hugues
Industry Affairs Manager
Vodafone New Zealand Limited