

29 July 2011

Dr Ross Patterson
Commerce Commission
PO Box 2351
Wellington



Via Email

Dear Ross

Unbundled Copper Low Frequency Service (UCLFS) STP

Introduction

Representatives of the industry recently met to review and discuss the draft UCLFS STP documents, drafted by Telecom in response to the Standard Terms Determination process initiated by the Commerce Commission under the Telecommunications (TSO, Broadband and Other Matters) Amendment Act 2011 (Amendment Act). The purpose of this letter is to advise the Commerce Commission of the outcome of the industry review of the draft UCLFS STP documents.

Background

As part of the Amendment Act there was a requirement that a new designated service - Chorus's UCLFS be added to Subpart 1 of Part 2 of Schedule 1 of the Telecommunications Act 2001. The Amendment Act further requires (under section 74) that the Commerce Commission make reasonable efforts to make a standard terms determination (STD) under section 30M of the Telecommunications Act for the UCLFS Service before separation day.

Telecom has proceeded to draft the UCLFS STP documentation and has, via the Telecommunications Carriers' Forum (TCF), sought initial industry feedback before the UCLFS STP documentation is submitted to the Commerce Commission.

As part of the TCF process to date the following parties have participated: Airnet, CallPlus, Chorus, Commerce Commission, Enable Networks, Kordia, Telecom, TelstraClear, Vodafone, Woosh, Compass Communications.

Draft UCLFS STP

On 1 July Telecom and the Commission briefed TCF Members on the changes required by the Amendment Act and the proposed approach for developing the UCLFS STP. The working party met by audio on 11 and 19 July 2011 with the aim to provide feedback to Telecom on the following UCLFS STP documents:

- UCLFS General Terms
- UCLFS Implementation Plan
- UCLFS Operations Manual
- UCLFS Price List
- UCLFS Service Description
- UCLFS Service Level Terms

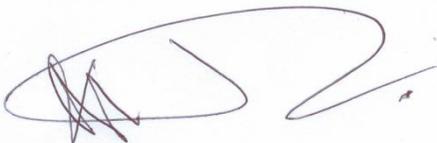
A final meeting was held on the 22 July 2011 for TCF Members to review amendments made by Telecom in response to earlier working group feedback, with the view that documents would then be finalised by Telecom and submitted to the Commerce Commission. It was agreed at that meeting that Telecom confirm resolution of a few minor residual issues after which the STP documents could be endorsed by the working group.

Telecom has subsequently confirmed resolution of those issues and the working group now endorses the draft UCLFS STP documents.

The TCF invites the Commerce Commission to note the consultative process co-ordinated by the TCF and the working party's endorsement of Telecom's draft UCLF STP documents.

The TCF also notes that due to the compressed timeframe of this process further comments may be made throughout the STP and STD consultation process by the TCF and/or by individual members of the working party.

Yours sincerely



David Stone
Chief Executive
Telecommunications Carriers' Forum