

15 October 2007

TSO Review
Information Technology & Telecommunications policy
Ministry of Economic Development
POBox 1473
Wellington

by email: tsoreview@med.govt.nz

**Telecommunications Service Obligations Regulatory Framework
Discussion Document – August 2007**

Submission by CallPlus

Public Version (there is no confidential version)

1. CallPlus welcomes the opportunity to comment on the above-mentioned TSO Discussion Document.
2. CallPlus is the largest independent and 100% New Zealand-owned telecommunications company in the country.
3. This document covers a very wide range of current and possible future aspects of the TSO regime in New Zealand. Accordingly, we believe that prioritisation for the important topics will be a key element to the development of a comprehensive, workable solution. We understand that MED is comfortable with this approach.
4. CallPlus supports the TCF proposal to consider many of the TSO matters referred in the discussion document by way of the formal Working Party structured process on an industry-wide basis.
5. CallPlus is very supportive of the general concept of contestability for the delivery of relevant telecommunications services to groups of Customers that are deemed uneconomic by the incumbent TSO Provider.
6. There are a number of significant extensions to the TSO regime proposed in this document that would have a prohibitive impact on the sector as a whole if the requirements were applied to all Customers. CallPlus is generally supportive of the concept of “targeted” solutions for particular Customer groups. We understand that MED is also comfortable with this approach.
7. Bundling of retail telecommunications products/services has already begun in earnest and will increase significantly over the coming years. This means that specific pricing for particular elements of a bundled service may not be easily identified. The ongoing TSO regime needs to be mindful of this when requirements to compute pricing are prescribed for the future.

For further information please contact:

Graham Walmsley
General Manager – Regulatory and Wholesale
CallPlus Group
CallPlus Business Centre
Level 4, 110 Symonds Street
POBox 108-109 Symonds Street
Auckland

Tel: 021 246 0005
Tel: 09 919 6028
Fax: 09 919 6029
Email: GrahamW@Callplus.co.nz

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G. Walmsley', with a large, sweeping flourish at the end.

Graham Walmsley
General Manager – Regulatory and Wholesale