



25th January 2008

Operational Separation Submission
ICT Regulatory Team
Ministry of Economic Development
PO Box 1473
WELLINGTON

By email: operational.separation@med.govt.nz

Submission on Amended Telecom Separation Plan

Public Version (there is no confidential version)

CallPlus thanks the Minister for the opportunity to make this submission on the amended Telecom Separation undertakings. Due to the tight timeframe for response we have been unable to make a detailed submission. However, given the importance of operational separation to creating a 'level playing field' for competition, we would like to register our support of the points raised in the InternetNZ submission of the 25th of January 2008.

In particular we have serious concerns that the proposed changes to the Wholesale division manager incentive structure. In our view these will seriously undermine the proposed separation plan and will produce the opposite behaviour to that which is required.

CallPlus hopes that this and other aspects of the amended plan will be reconsidered after reviewing submissions from parties.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'G. Walmsley'.

For further information from CallPlus please contact:

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