



## Brief Submission

on the

Standard Terms Proposals for

LLU and LLU Colo

28 June 2007

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**InternetNZ**  
**Internet Society of New Zealand (Inc)**

Dear Osmond

1. InternetNZ has not reviewed in any great detail the Standard Terms Proposals for LLU and LLU Colocation, submitted by Telecom to the Commission and published for consultation earlier in June.
2. Much of the material in these Proposals has emerged from the TCF Industry working groups, which have in InternetNZ's view been making very good progress on developing the technical and operational standards of the services. Other elements have been drawn from Telecom's standard wholesale contract, with which the industry is also very familiar.
3. It is in the interests of prospective access seekers to review these documents in detail and in depth. We are confident that they have done so.
4. InternetNZ reminds the Commission that industry pressure for rapid finalisation of the Standard Terms Determinations must be considered in light of the very serious need to ensure the Determinations are of adequate quality. If time is needed by the Commission to get these Determinations right, then that time should be taken. This might include workshops to have the industry jointly consider any issues where the Commission feels further concise discussion might be useful.
5. InternetNZ concurs with other submitters that the proposed implementation timeframe for the services seems unnecessarily long. We understand Telecom's concern to agree to minimal legal requirements and to overshoot them, but the proposed timeline seems unnecessarily lax. We suggest the Commission aim for realistic timeframes that will challenge Telecom but will not be unachievable or unreasonable.
6. A similar point applies to the timeliness of imposition of the SLAs for the services. Telecom proposes that these not come into effect for some time after the introduction of services. InternetNZ notes that one of the biggest difficulties with the LLU rollout in the United Kingdom was poor quality of service by BT in the early days of the service. Consumer and access seeker confidence will best be promoted by a quality service rollout; and this can best be encouraged by SLAs being imposed from the time the service is available. In addition, the comments of other submitters about the stringency of the proposed SLAs should be considered favourably, as they need to be structured in a manner that, while reasonable to Telecom and to access seekers, provides strong incentives for compliance on the part of the access provider.
7. Thank you for considering this submission.

Yours sincerely

Keith Davidson  
**Executive Director**

For further information please contact:

Jordan Carter, Deputy Executive Director  
+64 4 495 2118, [jordan@internetnz.net.nz](mailto:jordan@internetnz.net.nz)