

# ISPANZ *update*

April 2007

## ISPANZ files operational separation submission...

ISPANZ submitted on the Government's operational separation plan, making three key points: Firstly, that LLU, enhanced UBS and Naked DSL are priorities; secondly, that equivalence is the focus with decisions around operational separation predicated on that; and thirdly, that full Equivalence of Inputs may take time and can be delivered in stages rather than waiting for the ability to deliver it in full.

It was noted that the access network division should use Equivalence of Inputs for all its services not just those regulated under the access regulation regime, and that there needs to be a full disclosure and consultation process around Telecom's Next Generation Network.

## ... and prepares structural separation submission

Telecom chose to make a proposal for structural separation into two companies rather than respond in detail to the Government's operational separation proposal involving three divisions.

The Government responded to that by seeking submissions on Telecom's proposal. ISPANZ is preparing a submission on that proposal for deadline of Tuesday 15th May.

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## Telecom operational support

Telecom Wholesale advised at a recent meeting that it has implemented the move location process and encourages all ISPs to start using it if they haven't already.

However, they have also identified that the move location process only works for residential customers so they need to re-visit the process for business customers. There is no timeline on that as yet.

In terms of other meetings Telecom is having an industry meeting on validation rules and processes on May 22, and ISPANZ is in the process of organizing a meeting with industry members on the Transfer Code and details around that.

If anyone is interested in attending the Transfer Code meeting please email Jenny Longhurst at: [jenny.longhurst@iconz.net](mailto:jenny.longhurst@iconz.net).

## ISPANZ posts position paper

A position paper has been prepared on Equivalence and Operational Separation, which has been posted to the ISPANZ website.

This paper is in line with the submission made to Government in response to its Operational Separation proposal.

It is recommended that members read both documents so as to put themselves in the picture on the this key aspect of telecommunications reform and ensure a thorough understanding of the concept of Equivalence of Inputs.

## Inbound communications

ISPANZ directors have adjusted the Communications Policy so as to clarify that ISPANZ will not ordinarily handle commercial approaches to the membership.

All ISPANZ members are listed on the website and commercial approaches should be directed to each individual member. This does not count out future exploration of consolidated buying opportunities or other combined business benefits if that proposed working group can attract enough members. So far it has one potential member but no leader.

# ComCom advises STD dates

## Telecom modifies peering proposal

Following its consultation process, Telecom is preparing a further proposal to ISPs in respect to peering, expected by the end of May.

Telecom initially proposed bilateral connections with ISPs at 29 points around New Zealand to exchange local data, but there were issues around who would be allowed to connect, what it would cost even if costs were "shared", and whether Telecom would connect to exchanges.

Jamie Baddeley has provided a report of a recent conversation with Telecom to the members list. Some points from that are that Telecom will provide a list of the 29 locations mid-May with maps by the end of the month. Each point will have access to up to 120,000 local customers and a "National Transport" service will be available from each point.

There will be a minimum port connection speed of 1Gbit/s and other technical requirements that are similar to other exchange points. Interconnection will be available as an Interconnect agreement (ICA) outside of WSA agreements.

Meanwhile, InternetNZ's external peering group led by Dr Murray Milner is preparing a report in a similar timeframe after meeting with stakeholder groups including ISPANZ, telcos, content providers and Government agencies. That group is seeking to find industry solutions to peering issues and produce a Code of Practice if necessary.

The Commerce Commission has issued indicative timelines for Standard Terms Determinations around unbundled bitstream access (UBA), unbundled copper local loop (LLU) and unbundled copper loop co-location.

The standard terms determination process is also underway for bitstream backhaul and LLU backhaul with scoping workshops for planned for May 25.

### Indicative timelines:

UBA	Start	Duration (working days)	End
Telecom prepares Standard Terms Proposals (STP)	4 April		11 July
Parties submit on STP	12 July	10	25 July
Commission prepares draft STD	26 July		28 August
Parties submit on draft STD	29 August	20	25 September
Parties cross submit on draft STD	26 September	10	9 October
Conference	18 October	1	18 October
Commission prepares final STD	19 October		5 December

LLU, LLU Co-lo	Start	Duration (working days)	End
Telecom prepares STPs	4 April (LLU), 16 April (LLU Co-lo)		12 June
Parties submit on STPs	13 June	10	26 June
Commission prepares draft STDs	27 June		30 July
Parties submit on draft STDs	31 July	20	27 August
Parties cross submit on draft STDs	28 August	10	10 Sept
Conferences	19 Sept (LLU), 21 Sept (LLU Co-lo)	2 (LLU), 1 (LLU Co-lo)	20 Sept (LLU), 21 Sept (LLU Co-lo)
Commission prepares final STDs	24 September		9 November

## Working groups

The revised workplan will be an agenda item at the next ISPANZ council meeting, so now is the time to get involved in the working groups. Groups that don't attract a leader and members will simply not be constituted, representing lost opportunity for the ISP industry.

If you have any queries on the information above or actions for ISPANZ to consider please contact the directors individually, or jointly at [directors@ispanz.org.nz](mailto:directors@ispanz.org.nz)