



30 June 2008

Broadband Investment Fund Submission  
ICT Regulatory Team  
Ministry of Economic Development  
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## **CityLink Submission: BIF Draft Criteria and Proposed Process Consultation**

Thank you for the opportunity to review and comment on this document. Our comments are limited to the Urban Criteria and follow with any relevant clauses and/or pages referred to.

### **General Comments:**

Generally we feel the proposed process is a robust and sensible methodology. However we are concerned that the Full Application submission period of 5 months would seem much too long for many potential Applicants.

### **Specific Comments**

Page 12 Questions on Urban Criteria

1. Yes, there should be sufficient time for most organised Applicants. Applicants that are able to organise Full Applications earlier than the proposed 5 mth period should be considered earlier (perhaps as soon as full applications are submitted).
2. *no additional comment*
3. Creating a sustainable business entity with only a relatively narrow focus at infrastructure may be a substantive barrier for some Applicants. Any Applications Services, as long they are delivered in an open access, non-discriminatory or equal equivalence basis, must be allowed.
4. See following comments.
5. See following comments
6. Application Assistance: the decision maker(s) should be fully available to Applicants during the Full Application stage to allow for Q&A.
7. The lengthy Indicative Timetable outlined in the document may actually delay some investment decisions. An exploration of a streamlines or priority process for some Applicants should be considered.



Annex Two: BIF – Full Application

- Section A Eligibility Criteria
  - General Comment: All criteria seem to be sensible requirements.
  - Clause 3.3 (a) Consideration of purchasing (or project based) volume or quantity is a normal pricing consideration. Thus a purchaser of 1 item should not expect the same prices as (say) 10 items.
- Section B Assessment Criteria
  - Criteria Weighting : The breakdown seems suitable (although we note that Project Benefits should include a consideration of Entity Sustainability).

I am available for specific questions or to provide any specific additional information if needed.

Yours sincerely

A handwritten signature in black ink that reads "Neil de Wit". The signature is written in a cursive, flowing style.

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