



111 Contact Code Response to Emerging Views Paper

Taylor Broadband is a rural telecommunications provider based in Hawkes Bay. We operate a network that delivers modern communications services beyond the reach of copper and cellular network capabilities.

We do this on tight budgets and slim margins.

We would like to make the following points or statements in relation to the proposed 111 contact code:

1. We broadly agree with the points that Spark has made in their submission regarding overreach beyond the legislation.
2. Equipment and cost recovery should be via grant funding from the Ministry of Social Development, or an extension of the Telecommunications Development Levy.
3. Definition of a vulnerable user or person should be more specifically defined as per legislation, rather than the broad interpretation currently proposed.
4. It should be noted that small network operators, such as ourselves, have a customer base heavily weighted to rural areas where alternative networks are not available – hence our presence in these areas.
We would like clarification around copper network suitability and the subscriber responsibility to choose technologies or networks that suit their needs.
Eg. The burden should not be on us to provide a backup solution for a voip based service, when a more suitable copper service can be subscribed to and has a proven track record of high reliability.
5. There are limited battery backup products available on the market that suit our unique client premises equipment, of which we have a significant investment in and no plans to change that equipment. Our technicians have assessed various battery products which claim to be suitable, but we have determined the products are badly designed and present a fire risk. Our buying power is too small to warrant custom-designed battery backup systems.

Others in the industry are talking about conventional desktop computer UPS systems as part of a solution. For various reasons we do not see these as a viable option either.

The reasons include

- Cost
 - Unstable rural power supply and voltages
 - Loud beeping during power cuts or times of unstable supply voltage
 - Very limited backup battery time (typically less than one hour)
6. Assessing subscribers should not be the responsibility of the ISP.
We believe there can be a serious concern around privacy rights and believe it should be up to the subscriber to present a medical certificate. A GP or family doctor can produce a certificate without releasing any information that may breach the subscriber's privacy.

7. What options would a service provider have to decline service if the customer is cost prohibitive to take on?

Currently we are able to decide which subscribers we wish to accept on to our network which has allowed us to expand faster into hard-to-reach areas for a greater good, resulting in modern services being delivered to more households than otherwise would have.

Being held back by a combination of unprofitable subscribers, slim margins on those that are profitable and such universal service obligations would have slowed our network growth. Many households that we currently service would otherwise be missing out on any modern connectivity. I expect this would be the same for all small network operators around the country.

An industry association to which we are a member (WISPA NZ) will be making a submission on behalf of its membership. We concur with any further points or statements they wish to make.

With Kind Regards,

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