

Wendy Fenn

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Commerce Commission  
New Zealand  
PO Box 2351  
Wellington 6140

Attn: Savaia Stevenson

Re: Draft Copper withdrawal and 111 contact code feedback

Dear Ms Stevenson

Further to our telephone discussion of 14 July 2020  
I wish to submit my thoughts regarding the above  
copper withdrawal and 111 contact codes.

1/ Notice period.

The six month period before Chorus can withdraw copper  
appears to be appropriate. However I would like to  
suggest that this is done at 6 months initially, 3 months,  
1 month and at 20 days. This would ensure people have  
a more timely reminder of the impending withdrawal than  
a 3 month gap and then nothing.

2/ Information Ehorus should provide consumers

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I think clarification regarding fibre and non fibre network would be valuable. It would be helpful if this was in plain english as not every person, especially, the elderly or sick, are able to comprehend highly technical information regarding copper or fibre options.

3/ Notification to Consumers.

This should be done by mail and should include a follow up telephone call to ensure the relevant post was received. NZ Post are notorious for losing mail especially in the rural sector.

4/ Who needs to be informed?

Along with the landlord in a rental situation, it would also be appropriate that the tenant is contacted. It should be a pure disclosure consideration especially if there has been a communication breakdown between tenant and landlord.

## 5/ Functionality of copper services

The code should include additional protections for consumers that rely on copper connections which cannot be used over fibre.

For those people who are disabled or have a medical condition or simply can't afford the initial and ongoing cost of fibre connection will be left out in the cold.

The gap between those people who can afford devices and those who can't was made abundantly clear during covid lockdowns. Hundreds of households in a lower income bracket were left high and dry without support.

Was there no thought from the Government as to what would happen to those people who are unable to afford the costs of fibre technology. And clearly no thought given to the vulnerable nature of our country in regards to increasing adverse weather events that impact on electricity outages.

What was the back up plan when the power goes out when the fibre network is in place? Nothing?

The Draft III code is especially relevant to us. We rely on our copper telephone line for all calls and don't own a computer or laptop.

My husband is 82 and suffers from otogenic vertigo <sup>and severe hearing loss</sup> due to a medical misadventure. Due to this his mobility is severely impeded, and the risk of falls is great. We live in an isolated community on the Coromandel Peninsula and I am his sole support person.

Our telephone is an important means of communication, as Geoff finds it easier to use the speaker phone on the telephone as the voices are clearer. Mobile phones seem to distort voices and make listening more difficult.

We are located in the small community of Kuaokuna which is 17 km from our main town of Whitianga. The Coromandel Peninsula often suffers from severe storms in both summer and winter and we are frequently cut off by slips and flooding. Power outages are a common occurrence and can last between 4 hours to several days.

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In small rural isolated communities such as ours there are elderly, disabled or sick people who are unable to use a computer and in some cases a mobile phone.

There are varying reasons for this, ~~and~~ maybe that they are not technically savvy, the capital expenditure of a computer and printer is too great. As is, the ongoing monthly cost of fibre services. These people are often on a very limited income and in their view costs of such upgrades for something that they do not require is unaffordable.

You must also remember that due to a sickness or disability people do not have the energy or will to learn a whole new skill set.

On a personal level we have lived in Kuaituru for 20 years and paid a monthly telephone rental of approx \$28. To upgrade to a fibre package we would be required to purchase a laptop and printer/scanner the cost of which is anywhere between \$600 to \$2600. Our monthly communications cost would increase to approx \$100 at a minimum.

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We would just prefer to keep the status quo and retain our landline. My husband is not interested in spending time on Facebook and Google, he has enough difficulty getting through the day. And I, as a fulltime everything, do not have the time to be bothered.

I note clause F21b Definition of a vulnerable customer

Due to Geoff's disabilities I would consider he would fall under the category of a "vulnerable consumer".

We do have a mobile phone, however, the Vodafone tower 5km away is unreliable. In fact all our neighbours struggle with reception in the house and are required to stand in their driveways close to the main road to receive calls or texts.

To this end if the copper landline is withdrawn some form of more reliable equipment should be provided by Chorus to ensure continuation of communication in a power outage.

Refer 12.4 of Draft III contact code:

Could this be amended to a longer period as per the mobility passes for disabled or impacted mobility. These have a maximum of 5 years and require a Doctors Certificate. People such as my husband

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hold one as he is unable to walk long distances and at 82, this situation is unlikely to improve.

So to be asked potentially to renew a certification on a 12 month basis would appear to be onerous.

Thank you for the opportunity of making some suggestions and giving us a voice to make you aware that not all people want the copper network to be withdrawn. I think too much reliance is being placed on the fibre network without so much of a hint of a back up plan in the event of a major weather bomb or natural disaster or hack by an outside organisation. Hopefully this may never happen but they thought the same about a global pandemic.

Yours faithfully



Wendy Fenn