

# Summary of consumer feedback on the draft 111 Contact Code

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## About this document

This document summarises the feedback we received from consumers on our draft 111 Contact Code. We published the draft Code on 11 March 2020 and invited consumers to tell us their views, including by completing an online feedback form that asked questions about some key aspects of the Code. Feedback closed on 17 July 2020 and overall 118 New Zealanders provided us with feedback.

This document includes:

- A foreword from the Telecommunications Commissioner;
- A summary of the key themes from the feedback we received;
- A copy of the information provided to consumers and the questions on the feedback form; and
- A copy of each completed feedback form.

We note that some of the feedback was marked as confidential, so we have removed these from this document, however all feedback has contributed to the key themes.

# Foreword

Kia ora,

Ngā mihi mo to whakaaro.

Thank you for submitting your views on the draft 111 Contact and Copper Withdrawal Codes.

These draft Codes are important for consumers:

- The draft 111 Contact Code ensures that vulnerable consumers, or persons on their behalf, have reasonable access to an appropriate way to contact the 111 emergency service in the event of a power failure.
- The draft Copper Withdrawal Code includes the minimum protections for consumers required by law that need to be met before Chorus can stop supplying copper phone and broadband services. The Code cannot stop the phasing out of the copper network, as New Zealand moves to fibre, but will help ensure a smoother transition between networks.

We received over 280 items of feedback from individual consumers, and 47 submissions on these two draft codes. We are delighted with the level of interest the quality of responses.

We are particularly grateful to the community, voluntary and consumer advocacy organisations who reached out to their members about the code and encouraged their members to give feedback. We appreciate the personal insights and experiences shared with us by so many New Zealanders of what matters to them and why.

Our team is now reviewing this feedback and will use it to shape and refine the Codes. This will ensure they support people who need them now and in the future.

We aim to publish the final version of the Codes in September 2020.

Ngā mihi nui.

Tristan Gilbertson

**Telecommunications Commissioner**

# 111 Contact Code feedback form

## Summaries of the code and questions to aid feedback

### 1. Information provided to customers

The draft code proposes that telecommunications companies must inform their home phone customers on new technologies, like fibre and fixed wireless, that these services may not work in a power cut at home.

Providers must inform their customers of the need for a backup to call 111 in a power cut when they move to home phone service on new technology and at least once a year.

Providers must also make this information easily accessible to consumers, eg, on their websites.

**What do you think of the information requirements? Is there anything else that should be specified?**

### 2. Process for people who need further support

The draft code states that home phone customers, who have no other way to contact 111 and who are more likely to need to call 111, can apply to be considered a vulnerable consumer under the code and are eligible for extra support at no cost.

The code does not specify criteria for being a vulnerable consumer. Instead consumers who believe they may be vulnerable, or someone on their behalf, must complete an application. As part of the form, a “person of standing” is asked to make a declaration to certify that the consumer is of a greater risk of needing to call 111.

**What do you think of the process for people who need further support?**

### 3. Who can certify?

A "person of standing" will assess whether a consumer is at particular risk of requiring the 111 emergency services. The following professions are listed in the code as persons of standing. They can certify on behalf of a customer applying for extra support as a vulnerable consumer under the code:

- lawyers (with a current practising certificate)
- chartered accountants
- university lecturers and professors who know you outside of university or in the capacity of an employer
- senior staff of organisations that provide a social service (such as Women’s Refuge)
- elders or pastors from a church, temple, mosque or synagogue
- justices of the peace
- serving members of the armed forces
- serving police officers
- senior government officials

- members of Parliament
- currently registered:
  - authorised financial advisers
  - marriage celebrants
  - pilots
  - dentists
  - medical doctors
  - engineers
  - nurses
  - teachers
  - legal executives
  - physiotherapists
  - mental health workers, including psychologists
  - veterinary surgeons
  - social workers
  - occupational therapists.

**What do you think of the list?**

#### **4. Solutions for those who need extra support**

It is the responsibility of the provider to supply a solution to their home phone customers who are vulnerable under the code, to enable them to contact 111 in a power cut at home.

- The solution must be provided at no cost to that consumer.
- The draft code does not specify what the solution must be. Providers must work with their vulnerable consumers to determine the best solution for their needs.

A mobile phone could be a good solution for many. However, some customers may not be able to use a mobile phone because of poor coverage at their home or due to medical, social or other reasons.

**What do you think of this proposal and what if any other solutions could be offered?**

#### **5. Regular contact from providers**

The draft code also requires that providers contact their vulnerable customers once a year or if they move house to confirm that the solution provided is suitable and still working.

Providers may ask vulnerable consumers once a year to re-certify that they still require this extra support under the code.

**What do you think of this proposal?**

#### **6. Any other feedback**

**Do you have any further feedback about the draft code?**

# 111 Contact Code: Consumer feedback

## Summary

118 consumers fed back on the 111 Contact Code.

The majority of feedback on protection for vulnerable consumers was positive. But they want us to pay more attention to:

- Definition of vulnerability
- Options for extra support
- Who can certify someone as vulnerable
- Information provided and the delivery

"Don't overthink it and make too many check boxes for 'vulnerable' people to get support."

"...please remember the elderly who may not embrace change and struggle with it."

## Who can certify?

Consumers had mixed views on the person of standing (PoS) certification requirement.

Many felt that having to get someone to certify vulnerability would be a barrier.

"a lot of these people will charge for services provided and the vulnerable people cannot afford to pay"

There was also concern that the list of PoS included people who were not qualified to assess vulnerability

Some agreed with certification and thought the list be widened to include family members, emergency services and support services

"Many of these have no qualifications to assess a person's needs".

## Alternative solutions

Most consumers agreed that the alternative solution must work for the consumer's needs.

However there was concern that many would be left with mobile phones that they could not use or with solutions that are not easy to maintain.

"...work with the individual to assess their needs"

"A 'vulnerable' person will end up a 'confused' person in an emergency if they need to go and hunt down a device that they never normally use to ring for help."

Consumers said back-up options must be available upfront and the provider must talk to the consumer on how to use it and any maintenance required.

## KEY THEMES

## Regular contact from providers

Consumers agreed with the requirement for providers to regularly check in with vulnerable consumers to ensure the solution is working for them.

However, they thought this should be more often than once a year. Ideally every 3-4 months because situations can change quickly.

"Remove the requirement to re-certify, just let the consumers make their own assessments."

"Great idea! That's why the Provider should be able to address needs and implement without the need to fill in forms and have 'someone' sign it."

Consumers overwhelmingly rejected the idea of annual recertification of vulnerability. Instead they thought consumers should be considered vulnerable under the Code until they opt out.

## Information provided

Responders generally agreed that information should be provided that their phone would not work in a power cut and what back up options are available.

Want the information to be accessible. Including plain English, visual infographics, multiple languages and through different channels like phone rather than all online.

"Website information is not sufficient and can in no way shape or form be considered 'easily accessible'"

"No one ever told us that we would not be able to dial 111 when there is a power failure."

Many felt that online information was inappropriate as the people the Code needs to reach are not likely to have access to the internet.

## Process for extra support

Some consumers felt the definition of a vulnerable consumer should be widened so that anyone without access to 111 in a powercut be deemed vulnerable.

Many consumers agreed that the ability to self-identify was best but felt the process may be onerous to very vulnerable people who don't have access to help or information.

"Don't make the process so complicated that vulnerable people will not apply."



**Ref: 111-1**

**Date: 1/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

No one ever told us that we would not be able to dial 111 when there is a power failure - we were given the opportunity to go on to fibre because it was a lot quicker for our internet. We have just found out after reading this that we can not dial 111 when there is a power out.

**What do you think of the process for people who need further support?**

We need the service to be able to dial 111 at any time - while there is a power out we feel more vulnerable.

**What do you think of the list?**

A lot of these people will charge for services provided and the vulnerable people can not afford to pay.

**What do you think of this proposal and what if any other solutions could be offered?**

A lot of older people find mobile to technical or too complex to use. The providers of the services must find an easy solution to this problem.

**What do you think of this proposal?**

Yes - the provider should check once a year at least and update the information they hold about the vulnerable client.

**Do you have any further feedback about the draft code?**

Typical making changes but not giving us the full story.



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-2**

**Date: 1/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

it is also up to the person to ask their [provider and i have a cell phone and most neighbors would be happy to help out

**What do you think of the process for people who need further support?**

not much tell them to get a phone

**What do you think of the list?**

not that much were are the disability service providers

**What do you think of this proposal and what if any other solutions could be offered?**

text messaging an alarm

**What do you think of this proposal?**

customers must also let the providers know if they change house city country

**Do you have any further feedback about the draft code?**

no apart from testing it out





## Draft 111 Contact Code: Consumer feedback

Ref: 111-3

Date: 3/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Information needs to be available in various languages and use infographics with less writing

**What do you think of the process for people who need further support?**

Should state the criteria, contact and how they apply as a vulnerable consumer

**What do you think of the list?**

Good

**What do you think of this proposal and what if any other solutions could be offered?**

Examples of options should be listed clearly from each provider as a requirement along with the contact and how and in various languages with infographics

**What do you think of this proposal?**

A process from each provider should be in place and clearly promoted, contact, infographics and language

**Do you have any further feedback about the draft code?**



**Ref: 111-4**

**Date: 5/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I think this message should be included/linked with all Power providers to dwellings. This should be part of the Providers community service to alert the new home owner/renter of their individual needs in cases of emergencies.

**What do you think of the process for people who need further support?**

I feel this identifies the need for a new style of phone, one that is old technology for the 'vulnerable' user. But has a built in capability to call 111 in cases of emergency in power outages. So a dual purpose phone, cordless hand piece, with a emergency dialing capability on the main cradle.

A 'vulnerable' person will end up being a 'confused' person in a emergency if they need to go and hunt down a device that they never normally use to ring for help 111.

I think we all acknowledge that a 'vulnerable' person will be elderly and have little or no knowledge of a unused mobile phone. I know my elderly mother never knew where her mobile phone was, she ended up having Dementia, but that wasn't apparent when she 'didn't want to use the mobile'!

**What do you think of the list?**

I would hope that a person from the Network provider could also identify a person that needs assistance 'vulnerable'. Rather than going through the 'distress' of that vulnerable person needing to make contact with one of the many people on the list. Obviously you are looking at a form trail, but I would like to think that it could be expedited a lot easier than that.

Again, a 'vulnerable' person tends to be a elderly and should be supported with a easier process to apply common sense!

**What do you think of this proposal and what if any other solutions could be offered?**

Yes it is the Providers responsibility.

Again the best solution would be a multi purpose telephone that allows 111 calls to



be made from the fixed base of the landline phone (have a SIM card fixed into the phone for emergencies). So any 'vulnerable' person can easily use it.

Maybe the Providers can sell these to the home owner at the outset to re-coup costs. A cost that can be charged through to a Agency to claim back if needed.

I think all dwellings should have this capacity, as a parent you teach your kids to ring 111 in a emergency. What happens if a child is visiting a 'vulnerable' person and needs to call for help? How will the visiting child know where another phone is, or why the 'vulnerable' persons phone isn't working.

### **What do you think of this proposal?**

great idea! THAT's why the Provider should be able to address needs and implement without the need to fill in forms and have 'someone' sign it.

### **Do you have any further feedback about the draft code?**

Get it right the first time please. Don't over think it and make too many check boxes for 'vulnerable ' people to get support.



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-5**

**Date: 5/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

Very Good

**What do you think of this proposal and what if any other solutions could be offered?**

Very Good

**What do you think of this proposal?**

All Good

**Do you have any further feedback about the draft code?**



## Draft 111 Contact Code: Consumer feedback

Ref: 111-6

Date: 5/6/2020

### What do you think of the information requirements? Is there anything else that should be specified?

I think it should be up to the provider to notify all customers if their service could be affected due to power cuts. Many including myself did not know this.

### What do you think of the process for people who need further support?

I believe anyone that cannot access 111 due to a power cut is vulnerable. Many people have cell phones but what if your phone is not charged and a power cut happens. It is unlikely but still a risk people may not know they could be taking.

### What do you think of the list?

I think family members should be included on this list. It is crazy that a vulnerable person needs to go to someone else to prove they are. This is about a service that is not being provided to people when they think they have it. The phone companies should be notifying all customers of this issue and not leave the onus on the customers themselves. Many will not know that this could be a problem.

### What do you think of this proposal and what if any other solutions could be offered?

It is a good idea to work with the individual to assess their needs.

### What do you think of this proposal?

I don't think they should have to re-certify as the phone company is obliged to provide a working service

### Do you have any further feedback about the draft code?



**Ref: 111-7**

**Date: 5/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

Someone needing further support"... maybe anyone who is in trouble and not able to ring due to electricity out or no cell phone coverage...not necessarily someone with some illness or disability .....

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

Maybe more cell phone towers could assist here....we live in an area Where we don't get cell phone coverage although most of those around us do, so we often go under the radar with phone companies who consider we get coverage.....if we are in trouble and can't get to the second floor place on a window sill where we can sometimes get coverage...we are vulnerable!

**What do you think of this proposal?**

Again...what is vulnerable...this sounds like it only applies to people who are in some way affected by a disability!

**Do you have any further feedback about the draft code?**



**Ref: 111-8**

**Date: 7/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Many of us have cancelled our landlines because of high monthly cost. But, as the copper network is in place there should be just a minimal fee for continued usage in times of emergency, rather than isolating many of us during an emergency, particularly those of us who live in rural areas and live long distances from emergency services.

With the copper network in place, it is at no cost to the provider.

The providers must not only inform customers of the need for backup but provide alternative emergency access.

**What do you think of the process for people who need further support?**

This is fine but don't make the process so complicated that vulnerable people will not apply.

**What do you think of the list?**

Ridiculous lengthy list.

A medical person, JP, Police officer would cover necessary details.

**What do you think of this proposal and what if any other solutions could be offered?**

Mobile phone would not be the answer in many of our rural areas.

**What do you think of this proposal?**

Don't think annual recertification is practical.

Every two years.

**Do you have any further feedback about the draft code?**

The providers are the people who have taken away emergency facility. They should provide the solution, particularly with the copper network already in place. Many of us have dial up phones that we can plug in suitable for that network .



**Ref: 111-9**

**Date: 7/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

This should have happened when the changes were made some years ago. I heard a radio programme about it on National radio some years ago. I thought there was a possible attachment to the fast broadband box.

My preference is to keep the copper wire landline until the system is more secure of all users urban and rural.

Even driving from Dunedin to Temuka I find some areas have no service on my mobile. Ten minutes towards the coast from Temuka near Clandeboye there is no mobile service at times.

**What do you think of the process for people who need further support?**

Given our earthquake risk and other natural disasters that effect the power supply in New Zealand most people need a reliable system for emergencies.

**What do you think of the list?**

Rather broad. Have these people been asked? It should be available to all people if the plan is to remove the copper wire system.

**What do you think of this proposal and what if any other solutions could be offered?**

An attachment to a fast broadband box outside or other solution would be useful and give security.

**What do you think of this proposal?**

I believe providers should develop a solution if they wish to replace the copper system. Electricity providers have a system for vulnerable people with medical equipment . There must be a better solution than an annual re certification.

**Do you have any further feedback about the draft code?**





**Ref: 111-10**

**Date: 7/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I think it is high time that there is a draft code as we have been moved from the old copper network to a wireless phone despite not having cell phone coverage where we live. Spark were hell bent on getting us off the copper as we had BB that was not fit for purpose. It was speed mostly less than 1 mostly about .5 and in order to have functioning BB it needs to be at minimum 5 and we never could achieve that speed. Sparks solution is WiFi which gives us much better BB although for no reason it just goes off even when the power is still on but mostly it is okay. However I was very anxious about not having an ordinary copper landline but I was assured that the new landline would be fine. It wasn't and no one could hear us if we walked around on our phone. Spark eventually after months of complaints sent a technician who sorted the telephone however if the power goes off at all then we do not have a landline. This was what I had feared right from the outset and had asked Spark if we could still have a landline on the reliable old copper network which was possible but if we did that we had to pay another complete monthly landline fee of approx \$90.00 which was simply unaffordable. I asked what happens if the power goes off and they assured me that the wifi landline phones had backup which would kick in if and when the power went off and this would last up to 2 hours. As most power cuts are less than 2 hours we decided it should be okay and by this time we have a tome of emails and correspondence and I was "over it". Of course there is no such thing as a battery back up we found when we had a power cut and this has made me very anxious as we have had two 111 call outs for medical matters in the last year. We live remotely, have no close neighbours and we have not been offered any back up for an emergency in the event of a power cut - which we do have. The new phone system is NOT AS GOOD OR AS RELIABLE AS OUR OLD PHONE SYSTEM OVER COPPER. admittedly we have BB that is fit for purpose (mostly) but to not have a phone in an emergency is ABSOLUTELY TERRIFYING. We believe our safety had been sacrificed for expediency by Spark - they could have given us wifi BB and kept us on the copper network for our landline until they put enough towers up to give us cellphone coverage.

**What do you think of the process for people who need further support?**

I did not know this and I think every rural person who is remote should make application. We should do this. ANY PERSON REGARDLESS OF AGE WHO LIVES IN A REMOTE RURAL AREA WHERE THERE IS NO ALTERNATIVE FORM OF COMMUNICATION WHEN THE POWER GOES OUT IS VULNERABLE.

NO problem getting a person of standing in our rural areas organisations such as Rural Women NZ and Federated Farmers members are all "persons of standing" and there can be forms that can be filled and signed. NO PROBLEM \_LETS GET ONTO THIS ASAP -

**What do you think of the list?**



**What do you think of this proposal and what if any other solutions could be offered?**

The old copper net work that they are trying not use was reliable for the last 100 years so lets keep it up to date until we have full mobile coverage around the whole of NZ

**What do you think of this proposal?**

Sound great to check in - but waste of time to recertify until they have provided widespread reliable mobile coverage throughout NZ

**Do you have any further feedback about the draft code?**

This situation whereby consumers have been left worse off with telephone communication in order it get adequate BB is a disgrace. I have been lobbying on this for several years and I am quite heartened that at last there may be some assistance to unsure we do not have a situation whereby any persons are disadvantaged or worse due to not being able to access emergency services.



**Ref: 111-11**

**Date: 10/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

Because the main telephone connection through the country is fibre which requires power input to operate.

Without power the telephone will not work and also the cellular network which also requires power, although the cell towers do have a battery backup, there is still the fibre connection to other cell towers with no line of sight connection therefore no possibility of contact to the 111 system in an emergency.

**What do you think of the list?**

ok

**What do you think of this proposal and what if any other solutions could be offered?**

The assumption that the mobile phone is the answer is a myth and a satellite connection like the emergency beacon is perhaps the obvious answer.

**What do you think of this proposal?**

A contact with those deemed vulnerable customers should be at least quarterly.

**Do you have any further feedback about the draft code?**



Ref: 111-12

Date: 10/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

May sure the person understand the situation

**What do you think of the process for people who need further support?**

Sound Ok

**What do you think of the list?**

Good

**What do you think of this proposal and what if any other solutions could be offered?**

Good

**What do you think of this proposal?**

Yes agree

**Do you have any further feedback about the draft code?**

Not at this time It is interesting the new technology did not allow for this situation. I was recently without the internet connect so no landline either, have a cell phone and good coverage.



Ref: 111-13

Date: 16/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Needed.

**What do you think of the process for people who need further support?**

How long is this process? If there is a backlog how many people are at risk?

**What do you think of the list?**

Thorough

**What do you think of this proposal and what if any other solutions could be offered?**

A solution is needed otherwise the above is useless. Also, backlog timeframes?

**What do you think of this proposal?**

Good idea.

**Do you have any further feedback about the draft code?**

Fix the holes and be ready for more people needing resources than realised or expected.



**Ref: 111-14**

**Date: 16/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Elderly customers who use their landline for calls. What is in place for them? They may not have internet connection.

**What do you think of the process for people who need further support?**

I personally don't think anyone really cares as the older more vulnerable people are such a small number. I think we need to look after these people better than we are. At 90 years old my Mum and others in her age bracket struggle with change at a time when we should be looking after them, making life as easy as possible and not causing stress to these people that as a whole have done so much and been through so much for our country and society.

**What do you think of the list?**

I think it is disappointing you do not list Career Firefighters as a "Person of Standing" as they are the most trusted profession. Yet, you have lawyers on there when many have committed fraud such as money laundering and you have engineers, social workers, vets, lecturers etc.

**What do you think of this proposal and what if any other solutions could be offered?**

Provide up-to-date medical alarms that can be utilised without battery back-up.

**What do you think of this proposal?**

I think this needs to be monthly if not quarterly as a lot can change in a year.

**Do you have any further feedback about the draft code?**

All I ask is please remember the elderly who may not embrace change and struggle with it as a younger person who may just be in a poor reception area would. These people are older and vulnerable and changes cause them great stress. It is not just advising of change but solutions need to be delivered personally by a very personable person who can explain things. Just sending them information or calling doesn't cut it, all it does is cause absolute distress and anxiety.



**Ref: 111-15**

**Date: 20/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I believe it is also important to mention that many vulnerable people such as the elderly rely on copper phone lines for their monitored medical, burglar and fire alarms. Before the copper connection is cut off, either alarms that use the cellular network to contact emergency services should be installed by their relative provider or a battery back-up should be provided to the Optical Network Terminal. In my previous job as a Fibre communication installer for Ultra Fast Fibre I had heard of battery backups being provided in Australia. Many of the people that rely on medical alarms are not technically literate so great effort should be made to get them to understand what revering their copper connection entails.

**What do you think of the process for people who need further support?**

Good idea, maybe a set of criteria could be created and given to Fibre installers/contractors so they can use their discretion before cutting off a vulnerable persons copper service

**What do you think of the list?**

Fibre contractors and internet service providers should play their part in identifying vulnerable persons. Us Firefighters and Ambulance officers should also be added to the list

**What do you think of this proposal and what if any other solutions could be offered?**

Good idea, battery backups should be considered

**What do you think of this proposal?**

Agree

**Do you have any further feedback about the draft code?**



Ref: 111-16

Date: 21/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Is informing enough? Should there be a website or something where all this information is consolidated and viable alternate options are listed, rather than 10 different sites with 10 differing versions of how to solve this issue. with easy-to-understand instructions on how to go about getting these other options. And brief explanations of why it is needed/important.

Could UPS's or the like be offered as a possible solution for short-term power cuts? or should it be up to providers to supply these if they encourage consumers to buy into these newer technologies?

**What do you think of the process for people who need further support?**

As long as the process can't be taken advantage of I like the idea of this

**What do you think of the list?**

looks fine

**What do you think of this proposal and what if any other solutions could be offered?**

The issue with many who are considered vulnerable is it is often associated with disabilities or mental health issues. A large portion of these I imagine might have difficulty using or adjusting to use mobile devices, as they can be fragile and can easily be lost.

I don't know how medic alert necklaces work but could this be expanded to work in this context? an agency monitors alarms and if an alert is sent, some form of communication can be opened between the two ends and if a genuine emergency is happening the appropriate authorities can be alerted?

Or as previously stated small Battery back ups or Uninterrupted Power Supplies (UPS) might offer a solution for brief powercuts.

Or a simple version of a mobile which has limited use beyond its purpose

**What do you think of this proposal?**

how is this contact going to be made?  
phone, personal visits, emails. Some vulnerable people may not be switched on





enough for likes of a better term to fully be able to re-certify this.

**Do you have any further feedback about the draft code?**

n/a



**Ref: 111-17**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Agree - this should also perhaps be required to be specifically acknowledged by the customer to ensure the information is not buried.

**What do you think of the process for people who need further support?**

“person of standing” is what, it should not be who you know that matters so the person should have some sort of statutory status and not just community prominence. Police, medical etc. Location could also be a factor, a community should perhaps have at least one accessible way of calling 111 even if no individual has a specific need.

**What do you think of the list?**

no - many of these have no qualifications to assess a persons needs and could be just 'doing a favour'. The persons involved should have a direct responsibility/involvement in an area where 111 would be considered an essential service - medical, police, fire - most of the others are unqualified and have no direct interest in the reasons for calling 111. Would these have to be pre-authorised or will they self assess? This list would make a joke of the process. Also potential risk of manipulation for gain.

**What do you think of this proposal and what if any other solutions could be offered?**

The solution could be difficult or expensive if outside mobile coverage areas, one reason not to make it too easy to get the service. What options are envisaged, it's pointless to have a code which has no viable resolution, so these should be spelled out (but not restricted to the options listed) to avoid created an nonviable code.

**What do you think of this proposal?**

Once a year is not often enough, the key issue is to have an emergency service available, annual checking is inadequate - the system should ideally be automatic and signal failure quickly.

**Do you have any further feedback about the draft code?**

Your examples should offer viable solutions to each scenario - at what stage does satellite phones or similar technology become necessary?



**Ref: 111-18**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Simple language should be used, and this should be pointed out to customers who change providers, and checked regularly by the company, not the customer.

**What do you think of the process for people who need further support?**

Everyone who is not able to call 111 in an emergency is a vulnerable person. This should not require the declaration from a person of standing

**What do you think of the list?**

This is a wide range, but as stated earlier, anyone who cannot call 111 is vulnerable

**What do you think of this proposal and what if any other solutions could be offered?**

Everyone should have mobile coverage. This is a basic requirement - like access to clean water

**What do you think of this proposal?**

Yes

**Do you have any further feedback about the draft code?**

Anyone who cannot contact 111 is a vulnerable person.



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-19**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I think they should not only inform customers but provide an alternative way to contact 111 free of charge in case of power failure where we do not have cellphone coverage at home

**What do you think of the process for people who need further support?**

It is imperative to save lives

**What do you think of the list?**

It is a satisfactory list

**What do you think of this proposal and what if any other solutions could be offered?**

It is satisfactory but must be implemented properly

**What do you think of this proposal?**

It is fair

**Do you have any further feedback about the draft code?**



**Ref: 111-20**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Provide an understanding how people can access 111 without fibre

**What do you think of the process for people who need further support?**

Problem with 111 it is for emergencies. How can you know if you will need it? Each 111 can be life threatening and many people are endangered by this issue be it from a medical emergency or violence

**What do you think of the list?**

Plenty on list but too much room for companies to assess and dismiss. I still don't think it should be singled out only for frequent users. I think an alternative for emergencies should be available for all. My partner may have a heart ache or fall down the stairs and be in a life threatening situation more so than someone who gets asthma (for example) regularly, also life threatening but not more important than the one off emergencies

**What do you think of this proposal and what if any other solutions could be offered?**

Who trains the at risk to maintain a mobile phone.

**What do you think of this proposal?**

Still focuses only on vulnerable group I still think it applies to all

**Do you have any further feedback about the draft code?**



**Ref: 111-21**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

We have just changed to Fibre two weeks ago and have not been told that our home phone won't work without power - we rely on a cellphone booster which also requires power so now with no power we have NO land line phone and no cellphone - we have children in the home and live semi rural. This information should not be expected to be read on their website - I rang and asked about Fibre so should of been told this or it should come with your installation pack.

**What do you think of the process for people who need further support?**

I think the process seems fair and reasonable for people who need support for access on a cellular network but our communities issue is that we have no cellular network even though we are in Auckland. So not sure how the process would actually help anyone in our community.

**What do you think of the list?**

A huge list - I expected just your GP would be able to do it.

**What do you think of this proposal and what if any other solutions could be offered?**

I think as we are in a diverse community with elderly and young children our whole community is at risk with power cuts and no phone lines - maybe in poor cellular coverage areas either a cell tower needs to be considered or a phone box in a central point.

**What do you think of this proposal?**

Yes that is fair and reasonable as it is a expense that may become irrelevant due to the persons personal situation so the provider should make contact and verify all is still working.

**Do you have any further feedback about the draft code?**

We live in a semi rural community with no cellphone coverage even though we are still in Auckland our area seems to be overlooked for cell towers. This would solve the problem of power outage issues and no phone lines. We have children and it concerns me that I don't have access to 111 when the power is out - that is when you do stupid things to improvise in cooking or activities - so risk of accidents is much higher. We also have a high power outage rate in our area as on the 'Piha line' so power outages occur half a dozen times at least a year.



**Ref: 111-22**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Nice factual approach. WE keep a corded old style phone on copper, and intend to continue to do so.

Quiz is too fiddly, jumping forward and obscuring the answers with too much 'heading' often before entry is completed

**What do you think of the process for people who need further support?**

**What do you think of the list?**

A bit 'Uncle Tom Cobley and all' - hard to see who is excluded!

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

AGREED

**Do you have any further feedback about the draft code?**



**Ref: 111-23**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I think the information is adequate but there is little choice but the inevitable move to fibre. Without a UPS, generator and Vodafone sure signal all working, I'll have no ability to connect and have a 5 month old baby. It's not fair to be forced into this situation especially living in Auckland.

**What do you think of the process for people who need further support?**

This focussed on health, what about fire or police where I'd have to run 5 minutes up the road to find reception if my house was on fire and the power cut out?!

**What do you think of the list?**

It is better than having the service provider make the decision. It is not nice for an individual to have to give sensitive information potentially to that service provider with information security breaches all too common

**What do you think of this proposal and what if any other solutions could be offered?**

I think there is a duty for at least every house that is on mains water or pays their council for refuse collection to have cell phone coverage.

**What do you think of this proposal?**

Let's hope we don't have a 10 day power cut like 2019 and rely on the providers to do their word

**Do you have any further feedback about the draft code?**

It's not just vulnerable people, a lot of Aucklanders, especially out west, where theft is frequent as are prowlers, they have monitored alarms that the alarm companies now want to charge \$90 for equipment then \$30 a month extra for the cellular/wifi alarm monitor but again only working when the mains are on. The second gangs realise that after 6 hours without power most UPS devices will be off and that every house without power is then unmonitored there will be chaos, especially if the people at their homes don't have coverage to call the police





**Ref: 111-24**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

This is a reasonable requirement for a consumer to make an informed decision.

**What do you think of the process for people who need further support?**

I don't believe this burden should sit with the provider. This should be the responsibility of the consumer to put in place what they need for their own circumstances. If additional support is required government support services should provide this as part of wrap around services.

**What do you think of the list?**

This list seems very broad. I refer to my previous answer where government agencies should complete this assessment as part of wrap around services.

**What do you think of this proposal and what if any other solutions could be offered?**

Once again, this seems like a solution for a symptom and not the underlying issue. Responsibility should not sit with the provider but with government agencies who can work closely with the consumer to provide complete wrap around support services

**What do you think of this proposal?**

Burden should rest with the consumer to confirm their solution is working. If additional changes are required this should be address by government agencies providing wrap around services

**Do you have any further feedback about the draft code?**

The proposed solution places a bandaid over the issue. Just proving an additional communication method does not solve the problem. End to end support through wrap around government services is required.



**Ref: 111-25**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I think a fairly detailed explanation of the homeowner/occupiers situation should be mandatory along with information, &/ or help to allow for power outage circumstances. I currently have my landline connected via the fibre optic system and this appears to be connected to the power. I have no idea if the phone will work without electricity, and have received no explanation from Spark about this. I note I am still charged line cost for this connection even though the old phone line is disconnected. I would expect that to be illegal, but do not really know, and don't expect to get any sense out of Spark.

**What do you think of the process for people who need further support?**

Since most of those who are in a position to need this support are most likely to be unaware of the problem, I would suggest the process is sadly lacking in many areas. I would suggest ALL people who cannot use their landline when the power is off need to be informed of their position by their telephone provider, together with the information necessary for them to decide if they meet the criteria for further support. This seems to be a case of new technology being brought in without any thought to the consequences to (Mostly) older people who cannot keep up with the changes. I am certainly in this position.

**What do you think of the list?**

Seem complicated.

**What do you think of this proposal and what if any other solutions could be offered?**

I am 68, live alone, have no close family or friends, and currently have several health issues, so I guess this is quite a relevant topic for me. I have no idea what technology is available to suit this problem, but I agree it is one that would be better to be resolved than not.

**What do you think of this proposal?**

seems reasonable - if providers can be trusted to follow the rules. (Doubtful)

**Do you have any further feedback about the draft code?**

Very interesting problem. Sadly I have no helpful suggestions as it is way out of my scope.



## Draft 111 Contact Code: Consumer feedback

Ref: 111-26

Date: 22/6/2020

### What do you think of the information requirements? Is there anything else that should be specified?

We live in a semi rural area and we have limited cell phone coverage. We would most likely not be able to ring 111 without a land line. Also our internet only works across the old telephone lines still. We do not get enough reception for wireless access.

### What do you think of the process for people who need further support?

Having to get a declaration from someone outside of the family just adds more time and difficulty to this process

### What do you think of the list?

Fine however we shouldn't need to do this.

### What do you think of this proposal and what if any other solutions could be offered?

We do not get enough reception in certain places on our farm to warrant the mobile being a valid "back up"

### What do you think of this proposal?

Ridiculous

### Do you have any further feedback about the draft code?

Always make things difficult for those who do not get central city service .. and we only live 25 mins from Auckland Central!



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-27**

**Date: 22/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

It seems to be missing:  
- kuia, kaumātua, and tohunga

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



**Ref: 111-28**

**Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

It's important but it's be important to know what options cover that back up option. Also ensuring the elderly in particular are clearly informed and not lost in technical jargon

**What do you think of the process for people who need further support?**

I don't think you can group people into those who may need 111 more often! It only takes 1 accident or 1 medical event and it's not always obvious. So I believe EVERYONE should have the option of further support.

**What do you think of the list?**

See previous: I wouldn't be on that list but what if my child had a life threatening accident, or I had a heart attack out of the blue??

**What do you think of this proposal and what if any other solutions could be offered?**

We have this exact issue, no mobile coverage during a power cut. To be perfectly honest I'm not technically minded enough to know what else is out there, but there MUST be a solution or alternative otherwise people are at risk and that's just not good enough.

**What do you think of this proposal?**

Helpful for the vulnerable or elderly

**Do you have any further feedback about the draft code?**

As stated previously I don't believe ANYONE should be without the ability to use the 111 service so if it can't be done (taking power cuts into account) then it shouldn't be done



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-29**

**Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

We have no way of contacting 111 if we have a power cut. Also don't have a landline our internet doesn't go at the best of times.

**What do you think of the process for people who need further support?**

Without power we are all vulnerable.  
If something happens to me at home how is my child going to call 111 with no internet or power.

**What do you think of the list?**

It's good

**What do you think of this proposal and what if any other solutions could be offered?**

Yes we have poor coverage a Mobil is not ideal

**What do you think of this proposal?**

Yes

**Do you have any further feedback about the draft code?**

No



**Ref: 111-30****Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Once a year seems too long for people who rely on 111 and are technologically ignorant.

**What do you think of the process for people who need further support?**

The definition of "Person of Standing" will need to be clear and extensive.

**What do you think of the list?**

Good.

**What do you think of this proposal and what if any other solutions could be offered?**

Mobile phones will stop working in a power cut, either due to overloading or flat batteries in the cell tower.

**What do you think of this proposal?**

1 year is too long. Maybe 3-6 months would be better.

**Do you have any further feedback about the draft code?**

No



**Ref: 111-31**

**Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

The provider should also provide copperwire phone access where customers do not have reliable cellphone coverage

**What do you think of the process for people who need further support?**

All customers who have no way of contacting 111 are 'vulnerable customers' as its likely that someone could die or be seriously injured without the ability to call for help

**What do you think of the list?**

Everyone is vulnerable who cant access emergency services from their home. Why make a special category when we would all be vulnerable

**What do you think of this proposal and what if any other solutions could be offered?**

The copperwire network must be left in place for those of us with patchy mobile reception or the provider beef up the mobile reception. The providers seriously dont care about whole communities that have awful Mobile reception and maybe this is the kick in the pants they need to improve it

**What do you think of this proposal?**

Providers should test the back up solution once a year for ALL customers that advise that they dont have mobile access in an emergency

**Do you have any further feedback about the draft code?**





Ref: 111-32

Date: 23/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Take care around the requirements. For example - does a footnote on the monthly bill suffice? (I am not commenting on the answer to that question, simply raising it as a point to consider. I see valid arguments for both possible answers.)

More awareness of the availability and limitations of battery backup units is also a must. Aside from Spark's no-longer-available unit, I'm not aware of any that are widely advertised. Most battery backup systems seem to be marketed towards enthusiast or business customers. I don't believe ISPs should be responsible for the supply of these outright, but perhaps they should be required to inform customers that such units exist and where they can obtain one (this could be as simple as naming a suitable retailer).

**What do you think of the process for people who need further support?**

While well-intentioned, this kind of open criteria is open to abuse. There is always a "person of standing" who will sign anything off either for personal gain, as part of some political / social agenda, or simply to "be nice". Similarly, there's always some factor that can be exaggerated or taken out of context to justify declaring oneself "high risk".

I suggest instead, one option is having some formal, but fairly open, criteria. This could start with the question of who's most likely to need to contact emergency services - home users are all pretty equal as far as needing to contact Fire goes, but those in high-crime areas or with known abusive partners etc might have a higher need to call Police, while the elderly or those with chronic medical conditions might have a higher need to call Ambulance. I'll leave it to an expert to figure out the finer details.

The other option is to abandon the "more likely to need to call 111" altogether and simply make it an objective "doesn't have any other way to contact 111" test, no further criteria apply. I suspect that this is what the current proposal would become in practice anyway, due to - as mentioned - the fact that there's always someone willing to sign off and always some excuse to claim the need.

In all honesty - I think the latter is the more sensible idea. When a 111 call becomes necessary, it isn't really relevant how likely the person was to need to make that call - only the fact that, right now, they need to make it.

**What do you think of the list?**



Lawyers, accountants, professors, senior staff of social services, JPs, police, government officials, MPs sound good.

Religious elders / leaders, hell no. That's going to be a prime source of abuse of the system.

Armed forces, and most of the stuff listed under "currently registered", doesn't really have the same standard in regard to this kind of thing, and I suspect many would be comparable to religious / cultural leaders in terms of willingness to abuse it. Some of them seem outright ridiculous - why would a vet or a pilot be a suitable person to sign off a hardship declaration?

### **What do you think of this proposal and what if any other solutions could be offered?**

Battery backup units!!!

"Social reasons" should not be accepted as an argument against a solution. Those who need hardship support should not be fussy about how it comes, as long as it's in a form that addresses their issue and is suitable to use. However, medical / disability is a valid reason to ask for another option.

Keeping copper should of course be an absolute last resort.

Perhaps it would be wise to, from some date in the future, to require ONTs / 4G modems to have their own battery backup? This would resolve a significant portion of the issue altogether.

### **What do you think of this proposal?**

Checkup (and customer re-certifying) is good idea after a house move.

Periodic re-checking seems overkill. Perhaps every 2 or 3 years; or specifically "when they have reason to believe that circumstances may have changed" (eg. a new mobile to

### **Do you have any further feedback about the draft code?**

Nope - but it'd be great to see Chorus compelled to either keep copper network maintained and up to latest standards (ie: VDSL capable, or at least full-speed ADSL2+ - no ADSL1), or replace it with fibre. Some areas have no options other than poorly-maintained copper that Chorus refuse to even acknowledge issues with, let alone fix.



**Ref: 111-33**

**Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

The people you are trying to protect probably are not going to consider that information on websites is “easily accessible”. And probably not accessible at all in the event of an emergency, when it may be needed.

**What do you think of the process for people who need further support?**

Its crap. A “person of standing”. What's that . I reckon I'm a person of standing. And why should they have to have “greater need”. The actual issue is that in the event of a disaster, if Mr Smith is trapped or injured, and needs to call for help, but he has a working cellphone, he can use that. Miss Jones, however, in the same situation , does not have a cellphone. So she is left to die. Its not a matter of having greater need to call 111. They both have the same need. Its that one has an alternative to the landline, the other does not

**What do you think of the list?**

Class discrimination, much. Interesting that you include “elders” and “pastors”, but not priests.

**What do you think of this proposal and what if any other solutions could be offered?**

Whistling in the wind. The only workable solution is battery backup for the infrastructure

**What do you think of this proposal?**

Way to go, make it as difficult as possible. People are not going to jump through these bureaucratic hoops. So, they'll die.

**Do you have any further feedback about the draft code?**

Its a total waste of time, and completely unworkable



**Ref: 111-34**

**Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

A lot of people have this technology without knowing it, or how to use it. Especially the elderly. Needs to be clear, on paper bills not just on a website.

**What do you think of the process for people who need further support?**

It needs to be simple and easy to do. Vulnerable people need a process quickly

**What do you think of the list?**

Fine

**What do you think of this proposal and what if any other solutions could be offered?**

This is why the old copper network should remain in place. Having no phone due to companies pushing people onto VoIP when they don't even understand the impact. Until a consistent and universal option is available then they should be able to use the copper network.

**What do you think of this proposal?**

Sufficient

**Do you have any further feedback about the draft code?**

Needs to be clearer around solutions and regulated, providers have difficulty doing their current job let alone being responsible for the vulnerable.



**Ref: 111-35**

**Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Absolutely this needs to be a priority for everyone. In an emergency every should be able to contact emergency services. Vulnerable people are anyone living alone, or with a medical condition or for any other reason they are vulnerable. When technology moves ahead it should be mandatory that services are still available to all that might need them which in retrospect is everyone. Power supply is not guaranteed so this is a must. Could be a field day for any person with dishonest intentions. I cant believe this even needs to have a conversation. What do these overpaid consultants, bureaucrats, people in management positions, politicians, Councils actually do ? Should this not be deemed necessary for the good of the people?

**What do you think of the process for people who need further support?**

How would you know if you were going to need an emergency service, presumably that can not be foreseen. I live alone and would expect to be able to do that as of right. I wouldn't know what might happen to me, but do know that I would only be able to help myself by calling an emergency service or someone who could then do it. Without that ability I am at greater risk. Should it not be done for everyone as part of providing a communication service and as part of govt. who presumably make sure the services are available and make the legislation.

**What do you think of the list?**

Terrible, what makes this list of people able to assess anything outside of their field? I wouldn't trust some of them to do their job let alone give them extra responsibility. It is a strange thing with no criteria and people like this able to assess. What is this based upon?

**What do you think of this proposal and what if any other solutions could be offered?**

Very loose. I am unsure of the point of this unspecified criteria. Why not change the technology to cope with no power! I am sure is within capabilities. Just another white elephant with no accountability.

**What do you think of this proposal?**

Can't see it happening. If it worked for all it would simplify it for everyone. Codes are only words on paper- in my experience they will make it so complicated that no one will understand it and it will fail in real time.



**Do you have any further feedback about the draft code?**

Why would we not expect that we should all be able to call emergency services



**Ref: 111-36**

**Date: 23/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Emergency contact should be available

**What do you think of the process for people who need further support?**

Locks a bit long winded

**What do you think of the list?**

Don't they trust the ordinary man

**What do you think of this proposal and what if any other solutions could be offered?**

A basic device that a person wears round their neck that can be pressed to summon assistance

**What do you think of this proposal?**

Logical necessity

**Do you have any further feedback about the draft code?**

N/a



**Ref: 111-38**

**Date: 24/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Please consider the merits of the following:

1 To mandate that in-house telecommunication equipment supplied by the Telecommunication company meets a standard to allow that equipment to be connected to an external power source.

2 That Points of Presence (POPs) have back-up power sources that are capable of functioning for a minimum period of time without power source.

3 That mitigation for power surges from any source be included in the design of POPs.

Thank you

**What do you think of the process for people who need further support?**

Would this support extend to the provision of household Uninterrupted Power Supplies for highly vulnerable persons?

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

The practicality of this will be dependent of the definition of vulnerability and how wide the net is cast.

Essentially this is a couple of mail merges a year and electronic contact and/or online support.

**Do you have any further feedback about the draft code?**





**Ref: 111-39**

**Date: 24/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

The free alternative should be included in the information.

**What do you think of the process for people who need further support?**

FENZ personnel, Ambulance personnel, and Police should have a simple referral system so that vulnerable people can be referred for the alternative service

**What do you think of the list?**

FENZ personnel and Ambulance personnel should be added to this list

**What do you think of this proposal and what if any other solutions could be offered?**

Those who can't use a cell phone should be provided with one of the satellite systems either an EPIRB or a satellite-based texting unit, the text unit would be preferable as an EPRB activation may result in excessive responses, whereas a text service can be targeted to the appropriate response for that person.

**What do you think of this proposal?**

That sounds reasonable but maybe a 3 monthly test of any system would be more appropriate.

**Do you have any further feedback about the draft code?**

There are areas in the country where there is neither good cell service nor good VHF radio reception, Possible the emergency services should also be provided with a satellite option so that when called to there areas contact with base is still possible wh



**Ref: 111-40**

**Date: 24/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

As an engineer for a large Fibre and Telco wholesaler, whenever we raise a fault with residential or business we only ever operate with mobile phone info not landline. Could something be added to show the amount/ percentage of 111 calls made by land line vs mobile phone. It would be an interesting comparison as I know a lot of telcos provide naked broadband only three days too.

**What do you think of the process for people who need further support?**

Everything servicewise is covered in the terms and conditions on the providers websites. I know pamphlets were passed out and videos shown on how fibre works etc. However that being said there is still a huge misunderstanding and lack knowledge on the end-user part (from my 6 years experience)

**What do you think of the list?**

Certification is fine, however it only means something so long as the company responsible knows how to act on it. I.e with training and a precise instruction "what to do incase of ..." I've seen a lot of processes change over time for medical and emergency services as well as schools when it comes to faults however it doesn't impact the fault resolution any better, meaning no matter how much something is escalated the techs can only drive at 50ks

**What do you think of this proposal and what if any other solutions could be offered?**

I think this needs to be done by the govt personally, having something like this is most likely to get distorted by the individual ISPs and RSPs. Something along the lines of awareness ads like checking smoke alarms, don't drink drive ads etc

**What do you think of this proposal?**

Regular contact means a txt alert as calling is costly per person when a batch of txt messages can be sent at the same time. This could be a good time also to mention medical alarms, home monitored alarms and home businesses in general. As there is a larg

**Do you have any further feedback about the draft code?**



## Draft 111 Contact Code: Consumer feedback

Ref: 111-41

Date: 24/6/2020

### What do you think of the information requirements? Is there anything else that should be specified?

not all consumers will have either access, or familiarity with the internet - the elderly in particular, so postal contact should be made if no access to the net or email

### What do you think of the process for people who need further support?

The “persons of standing” should have a list of guidelines to assist in making this decision

### What do you think of the list?

wide-ranging - good,

### What do you think of this proposal and what if any other solutions could be offered?

A pager type device, as used by elderly who have falls etc.

### What do you think of this proposal?

Sensible - is it possible to have a testing setup that they, or the provider, can test the device periodically?

### Do you have any further feedback about the draft code?

No



**Ref: 111-42**

**Date: 24/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

They should not “push” consumers to change from the copper network if they don't have to

**What do you think of the process for people who need further support?**

Needs definition of “person of standing”

**What do you think of the list?**

Can't see the reason for some - eg accountants (you don't dial 111 for a financial problem), university lecturers, members of the armed forces (an army private?) MP's, financial advisors, pilots, occupational therapists. Most people would not consider these professions relevant to deciding who needs to call 111

**What do you think of this proposal and what if any other solutions could be offered?**

Keep copper where there is no mobile phone coverage

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



**Ref: 111-43**

**Date: 24/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

what about a copper line, that has a disconnection tone on it, but when 111 is dialed, it goes through as normal without any interruptions

**What do you think of the process for people who need further support?**

great idea

**What do you think of the list?**

seems fine

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

good idea. what about every 6 months for vulnerable

**Do you have any further feedback about the draft code?**

nope



**Ref: 111-44**

**Date: 24/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

So far the idea of the information requirements are good. The once per year contact should be a leaflet followed up by a phone call to check that people have received it, understand it and if they have other questions.

**What do you think of the process for people who need further support?**

I think it is good, however this should be included in the new technology shift and the once yearly contact aswell, as circumstances may change on a yearly basis, or people may not have though that they could be affected. eg make contact explaining that the system the person is using may not work during a powercut and have a follow up questionnaire regarding vulnerability

**What do you think of the list?**

so far the list is good, however i believe serving members of fire and ambulance service should also be included aswell. As both these services (along with the police) are out in the community each day, have regular contact with people on all ranges of the social spectrum, know who they deal with (some on a regular basis), what their personal situation maybe/or is like. Also Police Fire and Ambulance are the ones directly affected if someone is unable to contact them for their urgent service.

**What do you think of this proposal and what if any other solutions could be offered?**

There are many options out there its just finding the best one for that client however More clarity needs to be sought on this as it needs to be a fail safe robust solution, that meets the needs of the client, that shouldnt require client maintenance eg relying on the client to have to remember to regularly charge a battery (as this will be neglected or forgotten about), that is quick to hand and readily available in an emergency. eg a mobile phone for “emergency use” will get chucked in a drawer and forgotten about, or buried underneath all the other junk that gets thrown ontop of it, something that is fixed inplace to prevent it from being lost, removed, damaged or tampered with

if going for the mobile phone option then all it needs to be is a “dumb phone” otherwise poeple will just get a free phone that will probably not be used for its intended emergency purpose. the phone is to have 2 functions, to be able to Call 111 or Text 111. with the ability to call or text a predertemined number eg 10 pre programmed set of cellphone or landline numbers for emergency use only, like direct family members incase of a civil



defence emergency. if the phone was on the cell network this could have one benefit with civil defence being able to send emergency notifications to the phone.

**What do you think of this proposal?**

yes this seems fine, providers should also contact everyone who uses that companies service each year aswell to tell them about the possible downfalls of their home installed system and ask questions to see if they meet the/a vulnerable customer criteria

**Do you have any further feedback about the draft code?**

not that i can think of at the moment



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-45**

**Date: 25/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Because I live in a Rural Area and we have many Power Cuts I have for many years paid to telecom (Spark) for a land line to enable me to to call if an Emergency arose.

**What do you think of the process for people who need further support?**

It reads very well.

**What do you think of the list?**

Good.

**What do you think of this proposal and what if any other solutions could be offered?**

A Mobile phone always needs to be charged for that you need electricity.

**What do you think of this proposal?**

Vulnerable people need guarantee of service.

**Do you have any further feedback about the draft code?**

No.





**Ref: 111-46**

**Date: 25/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I don't think it is enough to inform people of the risks, I think they should be provided with a mobile handset for emergency use if the copper service has been disconnected.

**What do you think of the process for people who need further support?**

Provide them with a mobile handset for emergency use.

**What do you think of the list?**

The list is too long and basically means anyone could sign anyone off as being at risk. I don't think the following have any reason to be on this list:

lawyers (with a current practising certificate)

chartered accountants

university lecturers and professors who know you outside of university or in the capacity of an employer

justices of the peace

serving members of the armed forces

serving police officers

senior government officials

members of Parliament

authorised financial advisers

marriage celebrants

pilots

engineers

teachers

legal executives

veterinary surgeons

**What do you think of this proposal and what if any other solutions could be offered?**

a monitored alarm or panic button.

**What do you think of this proposal?**

Good idea

**Do you have any further feedback about the draft code?**

NO



Ref: 111-47

Date: 25/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

I live and work rurally. I am also a rural volunteer firefighter. I know people who rely on the fact that if the power goes out, they can still hook up a telephone. Some rural people have made a point of holding onto, or acquiring a phone suitable for this purpose, which they store for emergency use.

I have begun perusing the documentation, but must now move on to other tasks. Yet I have probably perused the documentation MORE than many of the people who will be directly affected.

So, while the information requirements seem reasonably robust, a concise, but not condescending or patronising summary would be useful to many consumers. It can be done. I can guarantee that I could do it - based on extensive experience boiling huge amounts of information to useful abstracts. If I can do it, it can be done, and I would expect people who can do it to be out there.

**What do you think of the process for people who need further support?**

Per my first comment, on the whole, the process for people needing further support looks robust.

But again, while detail is necessary, a synopsis may be of use. Not only will many vulnerable consumers be unaware of the process, but many of the people of standing who could help them, will also be unaware of the process at this stage. And many of those people are busy: they don't make a living by devising or reading documents of this nature, but they are not stupid either - just overloaded at times.

I worked for 13 years as a prison psychologist in [REDACTED]. During that time, I was involved in many projects, including reviewing and revising various policies. For a couple of these policies, I devised A4 page flowcharts which gave an overview of the process. It was an absolutely excellent exercise, because it enabled me to boil the procedures down to something that could be grasped quickly. I tested them on coalface staff, with good results. I devised these flowcharts on a very large whiteboard, facilitating development to a point that I was satisfied would work on A4-sized paper.

Perhaps you could do a similar thing. REMEMBER: excessive detail favours process resistors (i.e. parties who'd rather not facilitate the process if they can get away with it), not process facilitators.

**What do you think of the list?**



The list looks comprehensive enough. In any given community, there should be one or more such people. And importantly, they are all accountable to their governing bodies.

**What do you think of this proposal and what if any other solutions could be offered?**

On the face of it, the proposal looks okay. In the realm of solutions, one may make suggestions to facilitate idea generation, but it is not possible to specify all possible, practical solutions. There is no reliable way to know what solution may be practical for any given situation.

However, some general solutions can help. For example, in areas with a rural fire station, why not have a contact device (I don't know what they're called - an intercom device) such as is found outside some country police stations for for out-of-hours contact with the communications centre. In any given area with a rural fire station, there would be at least a handful of residents who would be nearby, and who could (a) benefit themselves, and (b) render assistance to others

**What do you think of this proposal?**

Seems reasonable

**Do you have any further feedback about the draft code?**

No further feedback at this stage



Ref: 111-48

Date: 25/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**

I grew up with this , [REDACTED] , NZPO [REDACTED] Engineer , Transmission Section.

NZ were World Leaders in Communications. “ Telephones are like Water , a Human Right “ “and Damn Good for Business “

The original design model of the NZ Telephone System was that all phones had an independent power supply and could operate in emergencies.

Telephones were treated as an essential public service and almost every house ( and farm ) had a phone, 50 years ago ! ..

Unlike say - Coronation St where there was a shared phone box in the street.

This changed when NZPO Comms Division became Telecom and privatized , and services have been reduced to high density areas , with multiple carriers with no public responsibility.

<http://www.wordworx.co.nz/KiwitelcoTimeline.htm>

1965: New Zealand was now third in the world in telephone density with 35 percent of the population subscribing. Around 77 percent of all phones were on automatic exchanges.

1970: the New Zealand Post Office had begun offering its Datel (data/telephony) service sending computer and telex data over dedicated lines at 2400bits per second.

1971: The first satellite station is opened at Warkworth. There are now more than a million phone subscribers. The first overseas on-line link was created by American Express to connect into its hotel booking network. The government, through the Vice Chancellor's Grant's Committee made an arrangement to purchase five brand new Burroughs 6700 (later Unisys) mainframes for the



country's university's with a view to having them networked.

1976: Telephone users were given increasing autonomy with the shift from the old party line, operator-based system, to STD (subscriber trunk or toll dialing) which was available in most centers by 1976. International subscriber calling, without having to go through the operator, was also introduced as were push button and speaker phones. A substantial upgrade of the national telecommunications network took place in March. The Tasman 1 cable between Auckland and Sydney came into service in a joint venture between the New Zealand Post Office and Australia's OTC (Overseas Telecommunications Commission).

Sorry , I could go on , at 64 and fair time in IT , it amazed me how the accountants were always involved in the technical design !



## Draft 111 Contact Code: Consumer feedback

Ref: 111-49

Date: 25/6/2020

### What do you think of the information requirements? Is there anything else that should be specified?

I agree with this. I myself still have a landline as I have underlying medical issues and worry my mobile won't always be charged.

### What do you think of the process for people who need further support?

I support this.

### What do you think of the list?

This is a good comprehensive list and provides sufficient options that everyone should find somebody to help them.

### What do you think of this proposal and what if any other solutions could be offered?

If the only option is a mobile what happens if the phone hasn't been charged, or the power is out for several days as has happened in the past when there have been big storms.

### What do you think of this proposal?

I like this proposal

### Do you have any further feedback about the draft code?



**Ref: 111-50****Date: 25/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

What appears to have been overlooked is the fact that a major power cut may also cut power to the cell tower thereby rendering a mobile phone inoperable. In some areas the mobile coverage is limited to one tower and if that goes out then there is no way of calling emergency

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



## Draft 111 Contact Code: Consumer feedback

Ref: 111-51

Date: 26/6/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Having information on the website is not helpful for many especially older people 65+

**What do you think of the process for people who need further support?**

It should be compulsory for the consumers to be assisted and given the information

**What do you think of the list?**

The list is good.

**What do you think of this proposal and what if any other solutions could be offered?**

Ok

**What do you think of this proposal?**

Every 6 months would be better.

**Do you have any further feedback about the draft code?**





**Ref: 111-52**

**Date: 26/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Information should be provided in a range of languages and different formats - advertising of all kinds - radio, newspapers, tv,

**What do you think of the process for people who need further support?**

Make the process as easy as possible - If people don't know the service is available - how will they know to complete the paperwork?

**What do you think of the list?**

Good

**What do you think of this proposal and what if any other solutions could be offered?**

Knowing large providers - I doubt their ability to provide solutions to their vulnerable customers.....and it really worries me that so many vulnerable people will fall through the cracks through no fault of their own.

I do agree that the solution must be provided at no cost to the consumer.

**What do you think of this proposal?**

Yes that sounds reasonable - again, my only concern is people falling through the cracks.....not knowing this service would be available to them and to make sure they are contacted annually.

**Do you have any further feedback about the draft code?**

Thank you for the opportunity.



**Ref: 111-53****Date: 26/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**

The 111 service is not only necessary for vulnerable or at risk people. These services need to be available to everyone, and at all times. This should be mandatory. A service does not exist if it cannot be contacted.



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-54**

**Date: 26/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Sure. Recently we had a power outage at home and we used our mobile phone to contact the power provider. The telecommunications companies should provide power back up.

**What do you think of the process for people who need further support?**

**What do you think of the list?**

Good and inclusive list

**What do you think of this proposal and what if any other solutions could be offered?**

Back up power is ideal

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**

no



**Ref: 111-55**

**Date: 26/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Good. It is recommended symbols are used the various technologies and access.

**What do you think of the process for people who need further support?**

There are so many aspects to this problem when viewed from either the user or provider. Simplifying the problem has been achieved by what must be required from each provider. Put further requirements in place that cover all user circumstances.

**What do you think of the list?**

You have to be joking. No offence to such trusted people in your lists, but the majority would not know A from a bulls foot. Start considering people who are certified or registered in associated trades or those that supervise or control them.

**What do you think of this proposal and what if any other solutions could be offered?**

Bloody wrong again. The providers determining what is acceptable. You have to be joking.

**What do you think of this proposal?**

Monthly reports via internet or posted billing.

**Do you have any further feedback about the draft code?**

Too many aspects/problems need to be addressed here. I hold the impression you are playing about with this.



**Ref: 111-56**

**Date: 27/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Basically ok

**What do you think of the process for people who need further support?**

I hope the draft code does not actually have a comma after customers, as this question has, because it alters the meaning to include all customers, rather than just those 'who are more likely' etc.

More likely is also an incomplete comparison, so empty of meaning. More than whom? This is an unsound basis for specifying the people entitled to this consideration. The same applies to the wording 'of greater risk'. Greater than what? The idiom is 'at greater risk', and to make sense here would need to be followed by 'than' plus some kind of quantifying expression. Greater than average risk? High risk? Life-threatening risk? Needs to make sense.

**What do you think of the list?**

Many of them would seem to have no specific professional competence regarding the assessment of risk.

**What do you think of this proposal and what if any other solutions could be offered?**

Unclear whether it has been determined that alternatives to a mobile phone exist for this purpose. Has this been looked into? Don't like the prospects of vulnerable customers 'working with' providers successfully in this instance - the customer needs to know what is possible, and to be able to insist upon it if necessary. This vagueness puts the customer at the mercy of the provider for information and willingness to fund an alternative solution if a mobile is not suitable.

**What do you think of this proposal?**

This seems sensible

**Do you have any further feedback about the draft code?**



## Draft 111 Contact Code: Consumer feedback

Ref: 111-57

Date: 27/6/2020

### What do you think of the information requirements? Is there anything else that should be specified?

Could the info also appear on invoices online/paper so that older people are frequently reminded.

### What do you think of the process for people who need further support?

I think there should be a simpler way of endorsing who a person in need is. Some elderly may not even have a family member to do this for them so it would fall to a GP, caregiver etc who are already very busy. I wonder about having a person in GP clinics, libraries. Retirement complex who check up on a person's holistic wellbeing with each individual and signs as the 'person of standing'.

### What do you think of the list?

Forget my answer to number 2. You have identified a huge range of people if standing

### What do you think of this proposal and what if any other solutions could be offered?

Definitely puts the onus on the provider!

### What do you think of this proposal?

OK I guess

### Do you have any further feedback about the draft code?



**Ref: 111-58**

**Date: 27/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

These requirements at the very least. My landline offline has not worked correctly since I had fine connected. Offline was previously opposing perfectly on copper... now, on fiber, I can never be sure if it will work. Incoming and outgoing calls are affected.

**What do you think of the process for people who need further support?**

Yes... it's fine as long as the hurdle suggested is not to high.

**What do you think of the list?**

Way too long. Some of these people are thieves and rogues. The list should be of people who are "treating" the applicant... doctors, nurses, physiotherapists, mental health support workers and maybe they should be certified / authorised for good-standing and honesty.

**What do you think of this proposal and what if any other solutions could be offered?**

The customer must have had a 100% operating 111 service prior to the change that compromised their service.

**What do you think of this proposal?**

Yes. Good.

**Do you have any further feedback about the draft code?**

As touched on in my opening words...

Phone service providers must match the existing phone service, to at least the "pre-change" level of service... not only with 111 service. My landline is virtually unusable now as it cannot be trusted to work at any time. They tried.. a little bit, but lost interest very quickly.



**Ref: 111-59**

**Date: 27/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I live in a location where I cannot get cell phone coverage on my phone. A copper land line is the only alternative. Without the copper line I cannot make any phone calls including 111 calls or a call to the electricity provider to notify them of the power outage. Some of the outages we have in this rural location are local. I would also lose access to the internet without a copper land line.

**What do you think of the process for people who need further support?**

How does one know if they are at greater risk? On a farm there is always the risk of an accident even for a healthy person that could require a 111 call.

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

It doesn't appear there is any solution offered to customers who cannot use a mobile phone. How does anyone who lives in an area not covered by the mobile network keep in contact with the outside world if they cannot use a cell phone and do not have access to a copper land line?

**What do you think of this proposal?**

I think this proposal has the potential to cause extreme stress for some people.

**Do you have any further feedback about the draft code?**





**Ref: 111-60**

**Date: 27/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Many of those who are at risk are computer illiterate or do not have a computer, therefore requiring the providers to have the information on their websites is pointless.  
Notices sent out with invoices would be more reliable

**What do you think of the process for people who need further support?**

Looks good until you consider a small group of people who for whatever reason have a distrust of authority. Who is going to create successful and productive communication with them

**What do you think of the list?**

The list looks good but an intermediary may be needed. Is there any allowance for that intermediary

**What do you think of this proposal and what if any other solutions could be offered?**

Looks good. But whose going to monitor the performance of those 'providers' ?

**What do you think of this proposal?**

Recertification must be made very simple

**Do you have any further feedback about the draft code?**

What is in place to ensure that the providers meet the requirements. Law works, regulation is an environment for corporate slipperiness, guidelines are simply ignored



**Ref: 111-61**

**Date: 29/6/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

If the companies swap your technologies and services, there should be an alternate provided. They should also not be able to proceed until you have agreed, or at least be given time to sort out an alternate provider i.e. there should always be an acceptable choice.

**What do you think of the process for people who need further support?**

How is a person who is housebound expected to get a person of standing to make a declaration Also why can this criteria be extended to every one. There will be cases in emergency situations where you need to be contacted or need to contact the emergency services without being considered a vulnerable consumer.

**What do you think of the list?**

not every one may have access to these professional people due to circumstances or location.

**What do you think of this proposal and what if any other solutions could be offered?**

A simple choice should be made available from the start of a contract and all providers must make the available choice easy to activate. It should be remembered that in the Christchurch earthquakes the mobile system was the first to go down.

**What do you think of this proposal?**

This service choice should also be provided to close relations and carers.

**Do you have any further feedback about the draft code?**

The way that many service providers conduct them selves they make it very hard to change or indeed not change what they offer.



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-62**

**Date: 2/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

There should be option for people to purchase or be made aware of a battery back up for new technologies.

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

Sounds good

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



## Draft 111 Contact Code: Consumer feedback

Ref: 111-63

Date: 3/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

will this information be available in our Pasifika languages?

**What do you think of the process for people who need further support?**

as long as the application form is simple to use by our elderly etc, then its good

**What do you think of the list?**

good list

**What do you think of this proposal and what if any other solutions could be offered?**

yes it comes down to the Provider to do whats best for their consumers. Get a device that when you press 111 it goes straight to emergency services.

**What do you think of this proposal?**

Or vice versa, let the consumers make contact if something has changed .

**Do you have any further feedback about the draft code?**

overall this draft code is well thought of.



**Ref: 111-64**

**Date: 6/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

If there is a crisis which affects the power then only copper lines will work. If it is a major outage lasting for days then everyone's backup devices will be flat, no internet, etc so people's lives will be at risk. Copper must stay !

**What do you think of the process for people who need further support?**

In a crisis every one becomes vulnerable. No one should have to apply to be considered vulnerable. A fit young healthy person could be seriously hurt and need urgent medical help in a hurry, lots of ways people can become vulnerable. I am 70, live alone, live rural and my safety and security rely on being able to ring 111. Copper lines must stay !

**What do you think of the list?**

Total rubbish. As said, there are many instances that make a person vulnerable. It is an insult to have to get someone to "prove" you qualify. Every New Zealander has the right to get urgent help when it is needed without reliance on having power. For instance it is a proven fact that if you have a stroke you need to get to a hospital within an hour to avoid permanent damage to the brain.

The copper lines must stay or lives will be lost !

**What do you think of this proposal and what if any other solutions could be offered?**

There are no solutions if there is no power for any length of time. The copper lines must stay.

In a rural situation, power outage , there could be a big car accident which takes out the boundary fence and a herd of cows are on the road, police are needed, ambulance needed, a reliable source of communication is imperative. The only one is the copper phone lines.

**What do you think of this proposal?**

It is not just aged and infirm that are vulnerable. That is where your criteria for vulnerability is majorly flawed. For instance, I am advised my power will be off all day, my fencing is electric, how do I contain my stock ? I do not have solar units whi

**Do you have any further feedback about the draft code?**

The code is not going to do anything to save lives, it has too many flaws and is only designed for those medically



challenged. It does not take into account any lifestyles, accidents, emergencies, weather, volcanic events, earthquakes, etc, etc that can and will happen and endanger lives. All the alternative means of communication are power reliant and once batteries are flat will not be able to be recharged until the power is back on which realistically could be days , weeks or months.

All the communication providers rely on power to run the devices. Consumers rely on and pay for the services. It is not the consumers responsibility it is the providers responsibility to ensure they work.

Look what happened in the Christchurch earthquakes, the only means of communication were the copper lines and analogue phones not reliant on power.

The copper lines **MUST** be maintained or people will die. No one should have to 'prove'; they need it or are vulnerable.



**Ref: 111-65**

**Date: 6/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Website information is not sufficient and can in no way, shape or form be considered “easily accessible” for those who actually need it. We are presently going through accessibility of information problems with our elderly grandmother, regarding withdrawal of services to her by her bank, electricity provider and telephone company, which has left her traumatised, belittled, and scared. Every single one of them keeps referring her to their website or to use a smartphone app, when they have been categorically advised that she does not have the internet or a computer, and while she owns a mobile phone it is pointless because her [REDACTED], swollen, arthritic fingers simply cannot operate it. The corporates need to get off their arses, out of their offices and actually see for themselves who their customers are and why they can't just be fobbed off onto websites and apps.

**What do you think of the process for people who need further support?**

The vast majority of people who are vulnerable will not admit to it, let alone ask for assistance. Have you ever met an elderly person who will willingly pipe up and say “I don't understand”, or “I need help and support”? This ties in with the need for providers to actually visit the customer and see for themselves, not just rely on some tick-the-box call centre phone call from Delhi - and not just some part-time uni student without any life experience either, but senior managers who can place themselves on the couch and imagine “what if this was my grandmother/grandfather/brother/sister/mother/father?” The code really needs to include a sunset clause - that the provider must continue to provide the copper service until the account is closed and no attempt shall be made to compel the customer into a pre-emptive change in service.

**What do you think of the list?**

Next of kin and/or in-home caregivers. This list is far too prescriptive and irrelevant given those who are most at need are the most unlikely to actually ask for help, whereas those who are immediately involved in vulnerable customers care and support are those best placed to understand their needs.

**What do you think of this proposal and what if any other solutions could be offered?**

The code should specify that the primary alternative is to supply a universal power supply at no cost, that the secondary alternative is a mobile phone, and failing that, an alternative to be determined with due regard to the customers best interest. This is one part that needs to be prescriptive so as to mitigate the provider taking the cheapest



and/or easiest (for them) route that is not necessarily the best for the customer. I believe a UPS to be the best primary alternative as it is “set and forget” - the customer can still use a familiar device (i.e. corded handset with familiar buttons) whereas a mobile phone introduces a whole new piece of unfamiliar technology and from experience, when people are in high stress circumstances that necessitate calling for help, no matter how much “playtime” they've had with a piece of equipment, they default to what they are most familiar with and cannot figure out what to do without it.

**What do you think of this proposal?**

Regular contact is good - and that needs to be in-person or by phone. Not just defaulting to emails and automated messages. However, the onus most certainly should not be on vulnerable people to continue proving they are vulnerable - how humiliating is th

**Do you have any further feedback about the draft code?**

I think I've effectively covered the points I'd like made - I apologise if my answers have been a bit abrupt and not particularly polished but you can probably gather from the very first question that it's something of a raw point for my whanau and I right at this very moment. In fact, we were not even aware of the code and consultation until I happened to accidentally see something about it today, on the intranet of an organisation I have not belonged to for over 4 years! Actually, I think this is such an important thing that the consultation should be extended a month or two and some serious advertising put in place to get feedback (and not just Facebook or Stuff ads but on the radio and TV, where those who it affects stand a chance of actually hearing/seeing it).

The code ties in with wider questions our society needs to be asking itself as it becomes increasingly digitised and physically disconnected at an exponential rate - we think we're making progress but we are quite literally abandoning our elderly, disabled and anyone challenged by the pace of change. Businesses must be held accountable through social licence to operate and the cost of business cannot be paramount to the cost of life, hence why I make suggestions such as prescribing supplying a UPS as the first alternative rather than leaving open ended solutions for providers to weasel out with something that suits them and their profits most.



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-66**

**Date: 7/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Hopeless

**What do you think of the process for people who need further support?**

Lousy

**What do you think of the list?**

So you don,t take the word of an individual who would have to go and locate somebody to do a verification it,s a bloody joke

**What do you think of this proposal and what if any other solutions could be offered?**

Crap

**What do you think of this proposal?**

Oh please this is a joke

**Do you have any further feedback about the draft code?**

No



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-68**

**Date: 9/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

Sounds onerous

**What do you think of the list?**

Seems complete - maybe highlight GPs and Pastors as those are likely to be more accessible

**What do you think of this proposal and what if any other solutions could be offered?**

Alert bracelet

**What do you think of this proposal?**

Quarterly as health can change rapidly

**Do you have any further feedback about the draft code?**



**Ref: 111-69**

**Date: 9/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

They also need to inform customers that a power cut that does not affect the customer can affect their telecommunications.

Power cuts can affect ISPs and cellular networks but not the power the end user is dependent on, and the customer may be off grid for power (as I am).

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



**Ref: 111-71**

**Date: 10/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

As well as explaining that 111 wont be availabel in a power cut should give solutions other than a mobile phone that also wont work with a sustained power cut in the case of the CHCH earthquake.

**What do you think of the process for people who need further support?**

Consumers should not need to apply for the status of a vunerable consumer, it should be a right,due to the fact that some time in the future they may have a guest who is vunerable and in many rural areas dont have a reliable mobile phone service as a back up

**What do you think of the list?**

the list should be greatly expanded

**What do you think of this proposal and what if any other solutions could be offered?**

The provision of an “ Unteruptable Power Supply “ and a 12 volt supply ie 240 V and or 12 Volt plus an UPS power back up should be manditory

**What do you think of this proposal?**

They should not need to recertify

**Do you have any further feedback about the draft code?**

Ther also needs to be a solution or option to replace the use of Fax ability. as a Fax is able to be used for prescriptions and laegal documents and not able to be “Hacked “ . A scan sign and resend via the internet is too easy to forge.



**Ref: 111-72**

**Date: 10/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

Who on earth qualifies as 'a person of standing'. I would consider myself to be a vulnerable consumer. In my house in Tomahawk, Dunedin there is virtually no cell phone coverage. Text messages sometimes work but not always. It is impossible to make a phone call on a mobile phone. I live by myself on a benefit due to a long term chronic illness. I can not afford to pay extra for battery back ups for a fibre based land line nor can I afford to pay for an expensive cell phone or cell phone plan. I want to keep my copper line.

**What do you think of the list?**

So the only person I personally could go to would be my GP, I have no contact with anyone else.

**What do you think of this proposal and what if any other solutions could be offered?**

It is not remotely clear enough or detailed enough. Providers will look for the cheapest and easiest way out of doing this. I for one, because of my chronic medical condition, am not in a position to go into battle with a provider looking for the cheapest, easiest way out.

**What do you think of this proposal?**

ok.

**Do you have any further feedback about the draft code?**

If the copper line will be kept in place for people who have no option of fibre, it means it could still be kept in place for other people who need it too. The cell net work is a total joke. As already stated, I live in Tomahawk, (Ocean Grove) Dunedin.



Ref: 111-73

Date: 10/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Providers must also provide their customers with information about what backup options there are and how to access them.

**What do you think of the process for people who need further support?**

it is very vague, and i can imagine that chorus and other providers will do everything possible to deny such applications except in extreme circumstances. this will leave a lot of vulnerable people feeling very anxious.

**What do you think of the list?**

pretty comprehensive

**What do you think of this proposal and what if any other solutions could be offered?**

a mobile phone seems to be the ONLY solution being offered - but this is obviously not a good solution. as well as those who live in areas with poor mobile coverage, there are many other situations such as age or disability that could mean a mobile phone would not be a viable option. my mother is [REDACTED] and technophobic; she easily becomes distressed when talking about digital technologies, and does not want to engage with computers, mobile phones, tablets etc at all. if she was in a crisis situation, she would not be able to use a mobile phone to call 111.

furthermore, even with a back up power supply for a mobile phone, there is no guarantee. i often travel with a back-up power supply for my mobile phone, and nearly every time i need to use it, i find that the charge has run down. you need to pretty much keep the things plugged in & charging all the time to ensure that, when you need them, they are going to work, and this is impractical to expect people to manage.

in a serious emergency, for example a major earthquake, power could be out for a significant time, long enough for mobile phone batteries to run down. or the emergency might occur at a time when the phone battery is already low. if an emergency requires someone to stay on the phone with a 111 call centre for some time, this can also quickly lead to a phone battery running down. we can't be expected to have a full battery and back-up power supply at all times.

i have long been concerned about the move to digital telecommunications meaning that in a power cut, phones will not work, and have always held on to a corded phone for exactly that reason. in a country that is prone to earthquakes, we should keep the copper network for emergency calls until an appropriate alternative is developed.



### **What do you think of this proposal?**

i'm not sure; i can imagine that my elderly mother would probably find it irritating & a bit confusing, but probably most vulnerable people would appreciate it. providers would need to be very clear in this call that they are not trying to sell anything,

### **Do you have any further feedback about the draft code?**

it's very important not to force change on vulnerable people, and it's very important to maintain the copper network for 111 calls until a better solution than mobile phones can be found.



Ref: 111-74

Date: 10/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

There is insufficient time to consult with the major at risk group (retirees and lower socioeconomic groups).

These people do not all have access to internet, or have computer capabilities. They have just experienced the isolating effects of the COVID 19 virus, with only the copper line as a main security and link to outside world.

Also there are people in urban areas that have intermittent cell phone coverage, as well as the rural areas with no internet at all or cell phone coverage.

It seems irresponsible for this consultation to be taking place with the background of COVID 19, many older people are trying to manage their day- to - day living activities without the stress of having to secure their access to emergency services.

**What do you think of the process for people who need further support?**

Please provide more details on what the options for 'extra support' are, as there is no detail provided in all of the information?

I am concerned that the most vulnerable customers are the very ones you will not hear from as they do not have access to the internet/ computers and often do not have computer skills.

I am advocating for two elderly people, in Northland, who did not receive the last " census forms, they eventually received them after I had made multiple calls for the forms to be dropped off, however, they were never picked up! These ladies do not have the internet, they live in a cell phone dead zone and are totally reliant on their copper land line with a St Johns alert system.

Many of the elderly are totally separated from family in different cities and even different countries, so to get a "person of standing" to certify that the consumer is at risk may be difficult, a further way of disconnecting these already isolated folk.

**What do you think of the list?**

Why is it a Senior Government official, when a Passport requirement is a Government Official, not necessarily a Senior one. ( They are all registered and have a number). Elders from the church is a bit vague.

**What do you think of this proposal and what if any other solutions could be offered?**





You tell me..... you are trying to dismantle access to emergency services with no plausible alternatives for the most vulnerable. How secure do you think you are making these people feel especially at this time with COVID 19. This group of people are also the most vulnerable to this disease.

This is a proposal from the industry, and this is extremely poor that solutions to the issues you will be creating have not been supplied. This leaves people feeling extremely vulnerable and distrustful.

### **What do you think of this proposal?**

How will customers be supported on a day to day if the solution is not suitable?

### **Do you have any further feedback about the draft code?**

1. Timeline for consultation needs to be extended and ensure identified vulnerable groups have had access to this information. I.e Elderly living alone especially in rural and semi rural areas or where cell phone coverage is poor.

2. serious clear options to meet the needs of the vulnerable, in order to give security to the 'change plan' needs to be posed before any action is taken.

So far you have successfully taken the sense of security away from the most vulnerable group that needs it the most, what are you going to do to restore the trust and faith of this group now?



**Ref: 111-75**

**Date: 10/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

We live in Marlborough up the Onamalutu Valley

We have a cooper based land line which in the event of a power cut I can use when I change my phone to one that doesn't require power.

We have no cell ph cover and our internet is only viable with a power supply as it is a transmitter system not based on fibre.

I would be very concerned if we had no way of communicating to a 111 service if this cooper wire system is removed .

Regards [REDACTED]

**What do you think of the process for people who need further support?**

Any body living rurally should have access to 111 in a power cut as accidents happen in remote areas ,especially in the dark and rain during storms .

**What do you think of the list?**

As I said we are all at risk rurally

**What do you think of this proposal and what if any other solutions could be offered?**

Not change the line from cooper .

**What do you think of this proposal?**

yes good

**Do you have any further feedback about the draft code?**

no



**Ref: 111-77**

**Date: 10/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Telecom companies should contact all relevant customers individually (by phone of course and/or by letter) not just put the information on a website. This information should explain the alternatives, particularly bnwo to phoen 111 during a power outage. Another important consideration is medical alert alarms.

**What do you think of the process for people who need further support?**

I think that a vulnerable customer is one who has a medical alarm and also those who live in areas that are more subject to power outages than other areas. Other vulnerable customers would include those are are elderly and/or not very mobile so cannot quickly get to a phone to dial 111.

**What do you think of the list?**

I am of the opinion that the list is adequate but could also include staff of community centers wh deal with elderly and/or vulnerable persons.

**What do you think of this proposal and what if any other solutions could be offered?**

I agree that a mobile phone is one solution. Another solution would be to require Chorus to keep on providing a copper phone line network.

**What do you think of this proposal?**

It is a reasonable requirement.

**Do you have any further feedback about the draft code?**

No more feedback.



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-78**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

Shouldn't be a person of standing. Any elderly person, or someone with a medical condition (I am an epileptic) should be able to opt in.

**What do you think of the list?**

OK

**What do you think of this proposal and what if any other solutions could be offered?**

Draft code MUST specify at least one, hopefully more solutions. One of the most stressful things is deciding on solutions for elderly - have a GOOD solution in place to start with. I have spoken with a number of elderly who have had to move back from wireless connection that has proved unsuitable and yet chorus/spark are targetting them to change to wireless.

**What do you think of this proposal?**

Does this not create stress for vulnerable people? They can opt-out.

**Do you have any further feedback about the draft code?**



**Ref: 111-79**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Providers should also offer information about reliable mobile phone reception in the customer's area. Despite being in a suburb, we live in a 'black spot' for Vodafone and 2degrees reception, and during power cuts (about 4/year) the fragile connection becomes overloaded.

**What do you think of the process for people who need further support?**

This just sounds like the telcos trying to save money and make it complicated to qualify.

**What do you think of the list?**

One more thing for busy people to do. Telcos should just believe their customers are telling the truth.

**What do you think of this proposal and what if any other solutions could be offered?**

We already pay a premium to have a landline, in the form of 'wiring and maintenance'. Mobile phone coverage is poor here. The draft code should offer clear options so that consumers can choose rather than relying on salespeople.

**What do you think of this proposal?**

Remove the requirement to re-certify, just let the consumers make their own assessments.

**Do you have any further feedback about the draft code?**



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-80**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

Backup power supply for landline

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



Ref: 111-81

Date: 11/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

In our instance my wife probably does not have the competence to learn how to use a cellphone, or any alternative technologies which may be provided. There seems to be a presumption people have the required cognitive and other abilities. She is familiar with using our current phone. Memory retention, especially in an 'emergency;' when she is flustered and perhaps confused, is a real issue.

Another feature is because of learning abilities my wife has not been able to learn how to use a computer - including an iPad or similar - she does not have the required capabilities. Hence information the web is totally inaccessible to her.

This would apply should no one be in the house at the time - periodically I am out and occasionally I go overseas to visit our family and can be absent for 6 weeks. Although she receives carer support that is for a few minutes once or twice a day.

I am aware of others who are in a similar situation.

As a comment householders would incur costs which are not incurred now e.g. battery replacements and the small amount of additional power consumed

there would also be the clutter of additional equipment.

There could also be issues arising from additional waste, e.g. consumption of batteries.

Has a full life-cycle assessment been done especially from the point of view of 'zero waste' and 'carbon zero'?

**What do you think of the process for people who need further support?**

The person may prefer to call someone else rather than '111' - and use of '111' given the particular circumstances e.g. distress rather than a real emergency '111' may be inappropriate.

My wife would not have the capacity to make such an application - she would need assistance/guidance.

Why should she need to make such an application, or someone on her behalf? And to seek out a so-called 'person of standing'? That aside a 'person of



standing' may not know her or anything about her - how could that person assess? The process could become a farce.

And would there be 'come back' on the person certifying the declaration - what would be the risk to him/her?

### **What do you think of the list?**

It's a nonsense.

### **What do you think of this proposal and what if any other solutions could be offered?**

A device which is similar to a push button analogue phone would likely be best as it requires no batteries or other equipment.

The other issue is cellphone towers can 'go down' because of lack of power supply and because of that may be less reliable than copper - realising of course those services can also be disrupted.

My understanding is telephone exchanges providing services by copper have back up batteries and/or onsite emergency generators.

### **What do you think of this proposal?**

It has merit, although the question of speaking to the right person could be an issue and in the context the person (customer) may have limited capabilities.

### **Do you have any further feedback about the draft code?**

Recognised the issues are neither simple nor straightforward.

Any replacement must suit the consumer/users rather than service providers. Consumers should not need to pay additional fees and charges - any costs incurred by service providers would be a cost of being in business.





**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-82**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Pointless unless it also tells us how we can get backup.

**What do you think of the process for people who need further support?**

Pointless. We don't know when we may need 111 assistance - that's the whole point of it. Everyone should have 111 access.

**What do you think of the list?**

Hopeless. Misses the whole point of an emergency service access requirement.

**What do you think of this proposal and what if any other solutions could be offered?**

OK, but it should be available to all.

**What do you think of this proposal?**

No - it should be available to all at all times.

**Do you have any further feedback about the draft code?**

Yes - it misses the point completely.



**Ref: 111-83**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

If there is a power cut people will also be unable to read information on their websites. It is unlikely that people will seek the required information until they have an emergency.

**What do you think of the process for people who need further support?**

Provision appears to be reasonable, provided that adequate publicity is given before the current access is terminated.

**What do you think of the list?**

Seems adequate coverage. Most people would know someone who qualifies to serve as a person of standing.

**What do you think of this proposal and what if any other solutions could be offered?**

Because the possible barriers to make communication with 111 during a power cut may vary extensively from customer to customer it is obvious that 'one solution fits all' will not be sufficient. The solution must equate to the method that would be used by the customer with the present system. Physical infirmities of the customer may need to be taken into account.

**What do you think of this proposal?**

Considered reasonable. What about customers who at any time may change to vulnerable for whatever reason? Should providers be required to make customers aware that they may apply for change of status by regular advertisements?

**Do you have any further feedback about the draft code?**

May be easier to leave the copper network in place.



Ref: 111-84

Date: 11/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Possible outages from causes other than power cuts need to be considered. Are the new services more or less vulnerable to technical outages in normal circumstances or outages in a range of natural or human caused disasters? Earthquake. Volcanic eruption. Flood. Tsunami. Extreme heat or cold. Electromagnetic pulse. And so on. It should be incumbent on providers to give information on the changed risk-scape.

**What do you think of the process for people who need further support?**

This approach is problematic and weighted too heavily in favour of the service provider. Service providers must be required to be proactive in identifying vulnerable customers. All customers must be considered vulnerable by default unless they opt out. You are clearly working on behalf of the businesses here and not the vulnerable citizens.

**What do you think of the list?**

It's a start but add the following:

- All presently employed public and state servants.
- All present members of registered trade unions.
- All members of the New Zealand Association of Scientists.
- All members of the Royal Society of New Zealand.

**What do you think of this proposal and what if any other solutions could be offered?**

This approach is not prescriptive enough. A minimum alternative must be defined. If that is not satisfactory, as determined solely by the vulnerable end-user, the service provider must provide a suitable alternative, as determined solely by the vulnerable end-user. "Working with" is a weak cope out phrase designed to favour service providers.

**What do you think of this proposal?**

Yes. This regulation is spot on.

**Do you have any further feedback about the draft code?**

Possible outages from causes other than power cuts need to be considered. Are the new services more or less vulnerable to technical outages in normal circumstances or outages in a range of natural or human caused disasters?  
Earthquake. Volcanic eruption.



## Draft 111 Contact Code: Consumer feedback

Ref: 111-85

Date: 11/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

I support this.

**What do you think of the process for people who need further support?**

I support this. But what is a “person of standing”? I see opportunity here for telcos to create bureaucratic hoops to jump through.

**What do you think of the list?**

I wonder what makes some of these relevant to the issue at hand?

**What do you think of this proposal and what if any other solutions could be offered?**

I support this.

**What do you think of this proposal?**

I oppose re-certification. Already disadvantaged people should not have to do additional work for a change in technology they did not ask for. Those who are obviously only in temporary need could receive a courtesy call to assess whether their situation h

**Do you have any further feedback about the draft code?**



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-86**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

It should be mentioned that it would be ideal to have the fibre and modem plugged into a UPS .

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



**Ref: 111-87**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Broadcasts on social media

**What do you think of the process for people who need further support?**

The nature of “further support” may also need to be defined

**What do you think of the list?**

OK

**What do you think of this proposal and what if any other solutions could be offered?**

Needs more work.

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-88**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Good idea

**What do you think of the process for people who need further support?**

Good

**What do you think of the list?**

Comprehensive

**What do you think of this proposal and what if any other solutions could be offered?**

Good up to a point.

For example a mobile phone has another limitation - it must be kept charged. The ability to charge relies on a live power supply.

I guess you could look at a solar power to battery powered fibre connection.

**What do you think of this proposal?**

Reasonable

**Do you have any further feedback about the draft code?**

No



**Ref: 111-89**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

Totally unnecessary and an infringement on people's privacy and dignity to have to call in hand to anyone on this list. I am an ex educator and I find this an invasive and repellent idea. Let's get this in perspective, a service needs to be provided for the fees we are paying for telecommunications. This proposed process is completely stacked in favour of the telcos. Flip the whole approach on its head and make the telcos tell the consumer why they can't provide this emergency service on demand!

**What do you think of this proposal and what if any other solutions could be offered?**

Surely there must be a technological solution to this issue? In Australia, for instance, Network Termination Devices (NTD) are built into fibre connections for use in emergencies. See this site for information - <https://infinitecommunications.com.au/power-outages-nbn/>.

**What do you think of this proposal?**

Totally unreasonable and again gives too much power to telcos.

**Do you have any further feedback about the draft code?**

New Zealand needs to lift its game with telcos and redress the power imbalance in the proposed process. Telcos should be forced to provide backup services for all Customers who need it in the event of an emergency. The client should decide and NOT be obliged to get an external person to verify their need.





**Ref: 111-90**

**Date: 11/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Its BS- we are on a rural with minimal mobile coverage (every second tuesday if you stand on one leg in the back garden on one leg with your tongue out). The landline is unusable due to the wires failing every time it rains. Chorus won;t fix the 2km between the first property on the road and the main road. We went to an internet phone because we were so fed up of having them out to fix it after every rainfall and being unable to hear anyone on the end of the phone. If the power goes out (every second time we get heavy weather) we have no internet and no phone. What are your suggestions for rural properties where chorus won't even fix the copper wires already there? Rubbish.

**What do you think of the process for people who need further support?**

How does a vulnerable person get a “person of standing” they are vulnerable- that implies they don;t have good contacts with people who count as 'person of standing’!

**What do you think of the list?**

That cuts out a lot of vulnerable people who don;t KNOW (or have access to ) anyone on that list.

**What do you think of this proposal and what if any other solutions could be offered?**

Maintain the existing copper network to a properly working standard.

**What do you think of this proposal?**

Once a year isn;t very often. They send a bill out every month, they could contact every month to ensure they are providing the service they charge for

**Do you have any further feedback about the draft code?**

It should be regulation not a “code” that providers will ignore



## Draft 111 Contact Code: Consumer feedback

Ref: 111-91

Date: 11/7/2020

### What do you think of the information requirements? Is there anything else that should be specified?

I think the information requirements definitely needed. I recently switched to a new broadband plan with Vodafone, which meant my landline won't work in a power cut now. I thought what's the point of having it - the reason I kept it was because in the event of a power cut I could still use it. I think the providers should find some way to keep the landline as it was - I'm 68 years old, and have a mobile phone, but would still like to be able to use my landline in an emergency.

### What do you think of the process for people who need further support?

Ridiculous. I think we should still have the option of landlines not depending on power.

### What do you think of the list?

Why can't it be a family member? If a person is at risk, how are they going to know who to contact out of these "persons of standing"?

### What do you think of this proposal and what if any other solutions could be offered?

As previously stated - bring back the old landline not needing power.

### What do you think of this proposal?

It should be at least once a month if the customer is really vulnerable.

### Do you have any further feedback about the draft code?



Ref: 111-92

Date: 11/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

For elderly and low intelligent people the requirement for yearly information is grossly inadequate. It needs to be at least 3 monthly for the first 2 years. Secondly the contact needs to be personal with a legal responsibility on the company to absolutely ensure that the person understands. Websites are useless to those who don't use them and there will be others with only a simplistic useage who will not be able to follow the sites. I think of my Mother in her last 10 years and there is no way she could have coped on her own. In this case my sister or myself could have helped her. A number of people live alone and a RELIABLE 111 service is essential.

Just merely talking of a website and yearly reminder is hopeless for certain categories of individuals and couples.

Again I stress that personal contact will be essential in a number of cases.

**What do you think of the process for people who need further support?**

Unless there are GOOD safeguards, I reckon a number of companies will - fall between the cracks - have excuses in their own minds for doing what others know will be a poor job - put their top salaries first - put profits second.

It needs to be VERY clear to companies that if there is any doubt as to whether or not a person is vulnerable then they get the extra support.

The concept of vulnerability itself is far too simplistic. Nobody knows when they will have a fall, when they will have a heart attack, when they will have stroke, etc.

The assistance needs to be automatic. And if not then for somebody who has fallen between a company's cracks, the company must be liable for all hospital and / or other and costs until they recover if failure to provide the 111 service has caused those costs (partially or fully).

**What do you think of the list?**

Needs to be as broad as possible.

Could possibly include office bearers of incorporated societies. (e.g. The Probus I am in is an incorporated Society and has an Almoner whose job it is to go and visit sick people (& I think check on people who have not been seen for a few months).



**What do you think of this proposal and what if any other solutions could be offered?**

Proposal essential. Good to see the company pays.

**What do you think of this proposal?**

May cause confusion to some vulnerable people.  
In many cases and probably most cases, the need will remain for the remainder of the person's life.

**Do you have any further feedback about the draft code?**

No.



Ref: 111-93

Date: 12/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

These are the minimum acceptable requirements. Telcos lack a sense of public service and are more committed to making a profit. Thank you for addressing this gap.

(I kept a corded phone for several years after I switched to fibre, but eventually grew tired of paying for the back-up. Your Plan B of keeping a power pack charged is better than nothing.)

**What do you think of the process for people who need further support?**

Good enough, although why do you require the declaration of 'a person of standing'? Why is the judgement of an adult not sufficient in itself? I can see why another person should be able to make the request on behalf of a person unable to do it for themselves, but why complicate matters in the usual case? Is this ageist?

**What do you think of the list?**

1 This requirement unnecessarily complicates matters for certain people, such as people with poor English, so I question its use at all. 2 Why make this list definitive? Why not use these as examples of people of standing, but leave it open?

I'm not certain what problem you are trying to solve here.

**What do you think of this proposal and what if any other solutions could be offered?**

Why not use a corded phone at the telco's expense? The actual cost of providing it for emergency use only is zero to the telco, surely.

**What do you think of this proposal?**

Reasonable.

**Do you have any further feedback about the draft code?**

No. Thanks for inviting feedback.



**Ref: 111-95**

**Date: 12/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Agree

**What do you think of the process for people who need further support?**

Looks good.

**What do you think of the list?**

Good

**What do you think of this proposal and what if any other solutions could be offered?**

Good. Concern providers will push back due to cost

**What do you think of this proposal?**

Good

**Do you have any further feedback about the draft code?**



## Draft 111 Contact Code: Consumer feedback

Ref: 111-96

Date: 12/7/2020

### What do you think of the information requirements? Is there anything else that should be specified?

Great requirements. I live in a rural area of Marlborough with marginal cell phone at best and was recently moved onto fibre. When I disputed this, they said that there was no way of moving back and never mentioned anything about my inability to dial 111 in a power cut. Several of our earthquakes in recent years have resulted in power cuts.

### What do you think of the process for people who need further support?

Seems clunky, for example, most people in remote rural locations as a group need to dial 111 reasonably frequently but individually may not need to do it very often and all of these people will suffer in a power cut. Who is a "person of standing"?

### What do you think of the list?

What about emergency response personnel? eg Fire, Ambulance

### What do you think of this proposal and what if any other solutions could be offered?

Good question.  
How about a dedicated copper wire to each vulnerable house for use as a phone line.

### What do you think of this proposal?

They should be able to re-certify without having to go through the whole process each time.

### Do you have any further feedback about the draft code?



**Ref: 111-97**

**Date: 12/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Consumers/customers should also be advised what alternatives are available to retain access to “111” during loss of power to their home. i.e. what mobile or other service is available.

**What do you think of the process for people who need further support?**

Some guidance as to what level of vulnerability is expected would be helpful to avoid wasted time with cases that are unlikely to succeed.

**What do you think of the list?**

Good coverage of people of standing.

**What do you think of this proposal and what if any other solutions could be offered?**

Devices could be developed (if not already available) that trigger “111” via a mobile network without providing full mobile radio service. This could overcome some of likely service provider objections.

**What do you think of this proposal?**

A good idea as the service could easily be forgotten and not be available when needed. This provides some protection.

**Do you have any further feedback about the draft code?**

Time may be needed for appropriate devices to be developed and made available.





**Ref: 111-99**

**Date: 12/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I agree with the proposal

**What do you think of the process for people who need further support?**

I agree with the above but also think those who live rurally, with no mobile cover, should also be somehow covered. While they might not be vulnerable according to the definition often they are near road accident hot spots e.g. Tauop-Napier Rd or responding to farm accidents.

Who decides on the person of standing?

**What do you think of the list?**

Looks good as a start. For rural areas need more of a local range:  
Fire /Rural service station head  
Ambulance service

**What do you think of this proposal and what if any other solutions could be offered?**

CB radio?

**What do you think of this proposal?**

I think to qualify you won't usually have a change that quickly. Plus the additional work of providing confirmation on a range of professionals with no pay for the inconvenience. I think the provider should check in with them every year - allowing the pers

**Do you have any further feedback about the draft code?**

Nope



## Draft 111 Contact Code: Consumer feedback

Ref: 111-100

Date: 13/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

Information must be provided accessibly in accordance with the Govt Web Standards/WCAG 2.1 level AA. Alternative format provision such as braille and large print.

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

Mobile phone seems reasonable in most cases. Some form of UPS would likely meet others although not sure how this would help in a widespread outage when power is off at the exchange too

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**



Ref: 111-101

Date: 13/7/2020

**What do you think of the information requirements? Is there anything else that should be specified?**

I was not told about there being no communication if a blackout occurred.  
I felt totally cut off from everyone and everything when that actually happened a short time ago. It was NOT a good feeling.

**What do you think of the process for people who need further support?**

You don't have to be a vulnerable consumer, even in the older age bracket it is frightening

**What do you think of the list?**

A mixed bag, but social and health workers are essential. However they are not always the class of people the average healthy or aged person may have easy contact with

**What do you think of this proposal and what if any other solutions could be offered?**

A mobile phone is not necessarily the answer. Coverage could be a problem especially if the consumer is not on internet.

**What do you think of this proposal?**

MAY ask????????????????????  
Must.....

**Do you have any further feedback about the draft code?**

Loopholes for provider responsibility



**Ref: 111-102**

**Date: 13/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

What sort of backups will work, exactly? There is no information on this and I can't help thinking that is because there aren't any, except the use of generators, say. Are we all to have a generator and diesel storage now?

Surely power cuts, which occur in civil emergencies are a time one may need to call 111 urgently and without first going outside, and getting the generator to work, assuming of course that it does.

This seems to be a problem that has arisen without anyone giving it enough thought. Removing copper lines until this is resolved is surely not in the public interest and may be the cause of deaths, possibly a significant number of deaths. Is this not a criminal negligence? And if not, why not?

**What do you think of the process for people who need further support?**

I think it is ridiculous. The 111 emergency service is not something one should have to be applying to be able to use. And who can say who will be vulnerable? Are we not all vulnerable in the event of, say, an earthquake affecting the whole country? Can you be sure that you yourself will not be vulnerable at that time?

Also, it is clear that, philosophically, the onus should be on the provider to provide an emergency service. Not on the public to apply for it. This 180 turnaround, treating an emergency service like an optional service one pays for, say, is repugnant to natural justice in my view.

**What do you think of the list?**

I think the writing of such a list indicates a complete lack of understanding of what the 111 service is there for in the first place, to be there for everyone.

**What do you think of this proposal and what if any other solutions could be offered?**

I think these are short sighted and inadequate. Only a generator or solar power etc in every house will provide long term access to 111 in the event of a long power cut. These would cost more than keeping the copper lines.

**What do you think of this proposal?**

Entirely inadequate.



**Do you have any further feedback about the draft code?**

I am appalled at this plan to reduce or remove access to emergency services for the entire country, during power cuts, by agreeing to remove and dismantle a system that works during power cuts with one that does not.

Truly, whoever thought of this idea is not a good problem solver. No solution has been found.



**Ref: 111-103**

**Date: 13/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Why are we starting with a presumption that we have to replace copper? We live in a earthquake-prone country that is subject to earthquakes of varying intensity every day and all year around. When any of these earthquakes becomes severe enough to knock out electricity, fibre becomes useless - and people become vulnerable.

**What do you think of the process for people who need further support?**

What exactly is this “extra support” or “further support”? Can it provide the certainty of copper 24/7 - and at the convenience of the consumer - unless those responsible for providing vulnerable people with extra support/ further support abandon their own homes and move in with said vulnerable people from the moment that disaster strikes - and stay with these vulnerable people and constantly provide them with extra/ further support until normalcy is restored?

**What do you think of the list?**

Secondary. What should be of prime consideration is how exactly vulnerable people - and we'll all be vulnerable in a power failure when the battery of our cellphone runs out - will be supported in making contact with others. Fibre may seem sexy, but its Achilles heel is that it stops working when there's a power outage.

**What do you think of this proposal and what if any other solutions could be offered?**

A mobile phone is a poor solution for everyone because the mobile network has repeatedly failed when disaster strikes as its unable to cope with the volume of calls and text messages. Further, a mobile phone requires its battery to be continually charged in order to work. You need electricity to charge your mobile phone, so what do you do when there's a prolonged power cut lasting days/ weeks (depending upon the severity of the emergency)? For Heaven's sake, please retain the copper network. New Zealand - more than most countries - requires it. We, as citizens, need the Commerce Commission to convince the providers not to abandon the copper network; we don't need the Commerce Commission to present the case of the providers to citizens. We, the citizens, have created you, the Commerce Commission, to safeguard our interests. Please do so.

**What do you think of this proposal?**

As mentioned earlier, we'll all be vulnerable consumers the moment the battery of our cellphone runs out of



charge - and there's a power failure. A tickbox exercise carried out once a year is doomed to fail in case of an emergency.

### **Do you have any further feedback about the draft code?**

Yes. It is myopic to even consider replacing copper with fibre when one lives in the Shaky Isles - a significant earthquake is a matter of 'when' rather than 'if' in New Zealand. A fixed handset connected to a landline can be purchased for less than \$20, and is part of our emergency preparation kit. Whenever we've faced an emergency during the last 20 years or so, the cellular phone network has been the first one to collapse and it can't handle the barrage of calls - or even text messages that starts almost as soon as an emergency occurs. If the power is out - as it may well be during such occasions - fibre becomes useless and your cellphone will work (although you may still not be able to make calls) only as long as its battery lasts. At least the copper network provides a working alternative in case of an emergency. Please don't be swayed by short-term thinking (such as the amount of money required to maintain a copper network); copper will pay for itself when fibre fails due to power outage and the landline is your only working means of communicating with people in other parts of the city/ country.



## Draft 111 Contact Code: Consumer feedback

Ref: 111-104

Date: 13/7/2020

### What do you think of the information requirements? Is there anything else that should be specified?

Suggest information sent to phone owners as an attachment to their account - if the account is paid that is proof the advice arrived at their house.

### What do you think of the process for people who need further support?

As before, send information with account. No response can be assumed to mean no vulnerability.

What happens if one becomes vulnerable after the initial time, eg gets ill a year later. Could there be a short, relevant statement on the front of each account?

### What do you think of the list?

Its long! I am not experienced in the area so no comment.

### What do you think of this proposal and what if any other solutions could be offered?

Agree with the no cost factor.  
Mobiles must be kept charged.. but cannot think of solutions or suggestions beyond that.

### What do you think of this proposal?

Good idea, must be simple tho, eg tick.. not sure about calling them...

### Do you have any further feedback about the draft code?

No, looks good but its an area about which I am ignorant so that's not confirmation of excellence or suitability.





**Ref: 111-105**

**Date: 13/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**

I am writing based on my own situation but it will also apply to others: I am physically disabled and live alone. If there is a power cut, and my mobile phone needs charging, and there is a need to call 111 (these three things could happen at once) then potentially there is a major problem. My need to call 111 might mean I was physically unable to get to a neighbour & ask them to call for me, & that I was physically unable to use my emergency clockwork mobile phone recharger. NB currently I have copper phone connection, & I have a corded telephone (ie that does not need electricity) for emergency use in power cuts. Yes, I have good mobile coverage, but as I have no car to recharge my phone if there was no electricity then having a mobile phone doesn't eliminate the risk. There needs to be a wider assessment of who qualifies for extra support to be able to call 111.



**Ref: 111-106**

**Date: 14/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

As is is sufficient.

**What do you think of the process for people who need further support?**

It is unnecessary. There are adequate low cost options in the market.

**What do you think of the list?**

Delete them all, this assistance is not needed.

**What do you think of this proposal and what if any other solutions could be offered?**

Any responsibility lies with the consumer not the provider, there should not be a provider obligation.

**What do you think of this proposal?**

Unneeded.

**Do you have any further feedback about the draft code?**

It is not up to me to subsidise other people's phone arrangements, via my ISP.



**Ref: 111-107**

**Date: 14/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Yes that's good. I specifically pay for a landline so I can call emergency services, neighbours and family in the event of an emergency.

**What do you think of the process for people who need further support?**

Consideration should also be given to people in rural areas which are more likely to be hit by power cuts, and less likely to get prompt repair service. Those people live further from neighbours who would be able to assist in an emergency, let alone the emergency services. I live 40km from Christchurch but we have had three major power surges in the past two years, with the longest power cut lasting 48 hours. Appliances and wall sockets can be damaged in these surges, affecting charging mobiles and modems.

**What do you think of the list?**

It's wide ranging, should cover everything. Possibly add the head of the local volunteer fire brigade, again in rural areas, for his/her local knowledge.

**What do you think of this proposal and what if any other solutions could be offered?**

We are at risk of power lines being brought down by flood, fire or tree-fall (in high winds), or because of an earthquake. Spark has advised us it wants to move us off copper line but I'm not sure if that would be to fibre or wireless.

Currently I pay for copper in order to have a landline so I can monitor the situation for updates and dial 111 if necessary. Our neighbourhood support group has a phone tree to stay in contact through emergencies. It's a rural area with houses further apart than in the suburbs, and down long driveways. That means we need phone access to check promptly whether neighbours need assistance. Many are elderly.

Potentially we may not have power for three days - mobiles can run down well before that so I'd prefer an alternative back-up.

**What do you think of this proposal?**

Happy with this.

**Do you have any further feedback about the draft code?**

Just to consider the rural people. Some don't have mobile coverage, still, and will have longer without power, eg in snow etc. We need an alternative to mobiles.



## Draft 111 Contact Code: Consumer feedback

Ref: 111-108

Date: 14/7/2020

### What do you think of the information requirements? Is there anything else that should be specified?

Yes supply elderly with a free cell phone that can contact 111. Also concerned about people who suffer from domestic violence and land line may be only way to call for help

### What do you think of the process for people who need further support?

I HAVE CONCERNS AROUND THE TERM OF "PERSONS OF STANDING" Standing over . A very poor choice of words.

### What do you think of the list?

Looks good. Add budget services.

### What do you think of this proposal and what if any other solutions could be offered?

Well if they had copper. They can be supplies fibre. What about rural. Bad weather and wipe out satellite and some cellar.

The bean counters will not want to spend in some situations the cost of install of fibre and will be looking for a cheap way out. Rail road the vulnerable. Heavy fines for company and personal fined as well and must pay out of their own packets the penalty and external auditors

### What do you think of this proposal?

Thats ok with provision for customers to approach providers if things change.

### Do you have any further feedback about the draft code?

Yea I am a support worker in mental health and concerned for the vulnerable in our community.



**Ref: 111-109**

**Date: 14/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Suggest also including this as a specific point in the declarations section of a contract with a customer.

**What do you think of the process for people who need further support?**

The vulnerability of a person can change at any time. The process should also include people who haven't filled out an application.

**What do you think of the list?**

Suggest including parent or guardian (where a child may be medically dependent) , power of attorney.

**What do you think of this proposal and what if any other solutions could be offered?**

As recently experienced during COVID-19, mobile calling was overloaded and calls couldn't be made.

Suggest providing a mobile phone that includes a free safety messaging app to contact emergency help. A key advantage is the customer can see when the message is received so they are reassured. This delivers an alternative means of communication if mobile calling is overloaded. For example, in a major power outage.

**What do you think of this proposal?**

Routine check is a good idea

**Do you have any further feedback about the draft code?**

Today, many households do not have landlines.

The majority of the public have only one means, being mobile phones, which reduces access to emergency services. This increases the risk of emergency call overloading and failure, at a time when many call overloading and failure, at a time when many callers are vulnerable.

Recommend the draft code includes offering an alternative means of communication (e.g free safety messaging) if emergency calling is overloaded. This will protect vulnerable customers as well as increase public safety.



**Ref: 111-110**

**Date: 15/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I live in a rural area and connect to the world by Wireless 4G rural broadband and telephone. Although living 10 mins from Tauranga city boundary I have very poor cellphone reception. Making a 111 call by cellphone would be dicey, although elderly I have taken the risk as I do not want to pay for both copper landline and wireless internet. Rural wireless internet is being rolled out with VoLTE connection only with RBI extension. I have found that VoLTE has required me to buy a new phone and then after much difficulty learning that the pay as you go Vodafone plans do not allow 4g connections, I now have to pay \$19 per month for a plan but still do not have a reliable connection and little need for the \$19 plan. We have a plan to drive to get a better reception. Just keeping a simple cellphone charged up is not enough to connect to VoLTE. There does not seem to be a way to provide people like me with a reliable 111 connection. Just looking for a solution for unwell high risk individuals is not good enough, anyone could need emergency help. Please extend fibre and 3G coverage to urban fringe areas.

**What do you think of the process for people who need further support?**

I would not be comfortable becoming classified as vulnerable and probably would not do so myself. It is not clear to me what technology could be bought even if I was so classified.

**What do you think of the list?**

what would half of these professionals know of medical matters, keep it simple GP or registered medical professionals such as nurses, mental health workers.

**What do you think of this proposal and what if any other solutions could be offered?**

mobile phone will be a problem esp rural areas and VoLTE limitations (see previous response)  
Spend the money to improve communications for all, extend ufb and 3G mobile coverage for all.

**What do you think of this proposal?**

I would not want such a fuss, perhaps simple phone contact with GP.

**Do you have any further feedback about the draft code?**



I would be interested in knowing what technology would help me and I would rather pay for it myself if it is reasonable cost. We try to be self sufficient in the country and do not want to become reliant on forms and interviews.



**Ref: 111-111**

**Date: 17/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

While it is all very well to notify customers that their phone will stop operating in a power failure, Electra Services Limited trading as Securely provides several thousand medical alarms to many disabled and elderly clients. Many of those clients don't have and are unable to operate cellphones. Some are outside cellphone coverage. Home phone providers need to provide a suitable battery back up (such as is provided by the Australian NBN) so that these people can continue to make emergency calls for a period after a power cut. In the worst case situation after an event such as an earthquake the person may have been injured and the many thousands of elderly people that only know how to use a landline that both have and don't have medical alarms need to be informed that the home phone line provider will provide an alternative way of contacting 111 that the person is capable of using.

**What do you think of the process for people who need further support?**

This needs to be fully explained in the information sent to customers complete with a simple written form that they can return to the provider to request this service. It should not only be an on-line application as many of these people will not have web access.

This extra support should be available based on reasonable criteria. Securely's investigation would indicate that many people over 80 years that have cellphones don't know how to use them and often don't keep them charged.

**What do you think of the list?**

The list is too narrow. We would suggest the addition of at least:

Employers

Community/Charitable support organisation staff who provide support on a regular basis to the vulnerable in the community

Service providers (non-telco)

Family or reputable friends who provide some support to elderly, disabled and vulnerable people

**What do you think of this proposal and what if any other solutions could be offered?**

See previous comments. From our investigations, many people we come across in our business are likely to be unable to make use of a mobile phone in an emergency. Actually using an unfamiliar device in the





dark could be very difficult. A big challenge will be to ensure that the phone is kept charged.

It is our understanding that most telco field cabinets have a minimum of 4-5 hours battery capacity. A power supply should be provided to individual vulnerable customers premises to enable these customers to use the same landline that they are familiar with, during a power cut for a similar period. FYI, to meet MSD medical alarm requirements, medical alarms providers equipment must be able to operate for at least 30 hours standby state without mains power.

We are also concerned as to the definition of “vulnerable consumers” as that is not specified in the 111 Contact Code.

### **What do you think of this proposal?**

Don't agree. Once provided, the extra support should not require re-certification on an annual basis. A condition of the extra support may include a review by the service provider annually. The initial certification process would be ownerous enough for

### **Do you have any further feedback about the draft code?**

Powering the new technology has always been of concern us for emergency calls. While many people will be able to use a cellphone, many elderly and disabled people will not. The potential is that this will cost lives when people are unable to make that 111 call when they need to. Because there will be a cost to provide the extra services to vulnerable people, service providers may try to avoid providing the extra services, especially as the term ‘vulnerable’ could be open to interpretation. Therefore there needs to be a right to appeal a telco's decision to an independant authority.



**Ref: 111-112**

**Date: 17/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

What about people who do not have access to a website?

How is a back up emergency service to be provided for people who for whatever reason do not own or are unable to manage or pay for a mobile and the back up pack to use in a power cut?

**What do you think of the process for people who need further support?**

ANYONE can need to call 111 at some time.

Vulnerability does not come into it.

It is necessary for us all to have a reliable way of making emergency calls.

**What do you think of the list?**

Everyone is vulnerable at some time.

We all need access to 111

The list is irrelevant.

**What do you think of this proposal and what if any other solutions could be offered?**

Incumbent on provider to ensure that the service offered is equivalent to that provided by existing copper landlines that continue to operate when the power is off!

For a variety of reasons there are no satisfactory alternatives for many people.

**What do you think of this proposal?**

We all need access to a reliable emergency phone system. This is not going to change from one year to the next.

**Do you have any further feedback about the draft code?**

Assumes wrongly that only some people need to have 111 accessible at all times.



**Ref: 111-113**

**Date: 17/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

Informing people of a backup 4 times a year would be ideal.

**What do you think of the process for people who need further support?**

A family member should be sufficient for someone advocating for a vulnerable person.

**What do you think of the list?**

It should include a family member

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

More frequently is ideal, say 3monthly

**Do you have any further feedback about the draft code?**



**Ref: 111-114**

**Date: 17/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

I think this is a sensible provision for customers. Vulnerable users should have mobile devices where viable services exist, and/or provision for service providers to offer/suggest recommended UPS devices or DC power backup units (eg Sentry Lite) to power ONT, routers, and phones in the event of local power outages.

**What do you think of the process for people who need further support?**

I agree strongly with such a measure to protect such people deemed to be vulnerable, given that there are technology solutions to mitigate against power outages, and encies, and natural disaster situations.

**What do you think of the list?**

It's an exhaustive list. I would be ok with a subset of those listed above. However, if it results in a less restrictive means to making sure that those who may be vulnerable within the context of ensuring their personal safety/well-being have access to resilient communication then it can only be a good outcome.

**What do you think of this proposal and what if any other solutions could be offered?**

As mentioned already, additional power backup solutions (to support ONT, phone, and router) for a given period are a good option. They could be remote-monitored for battery health as well, so that a managed service could be provided at no cost. In the case of longer outages, power companies may be able to bring in generator backup for local remote communities and vulnerable users.

There may also be VHF and amateur radio (HF) solutions available for remote users that could be viable in some situations - similar to the coast guard radio system. Modern trunked digital radio systems also exist that provide for text messaging, data, and emergency signalling/messaging. There are companies that can provide such solutions in NZ with various coverage options.

**What do you think of this proposal?**

Yes, a system "health check" is a good idea. Remote monitored automated systems are even better.

**Do you have any further feedback about the draft code?**



No. As a Network Engineer in the Telecommunications (Digital Radio) industry, I recognize the importance of diverse resilient communications in times of emergency/natural disaster situations, and am familiar with implementing/operating such essential communications systems as part of the organization I work for.



**Ref: 111-115**

**Date: 17/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**

As there is no actual form for submission please use this as my submission. As the copper lines are the only form of communication available during a crisis with power outage they should Not be withdrawn. Remember during Christchurch earthquakes they could only use analogue phones on copper lines ? The copper lines must remain or peoples lives will be put in danger. I am rural Auckland and believe the fibre will not be made available in many rural areas. In the current climate change situation it is very likely there will be major storms and disasters that will take out power and unless there is a guaranteed communications line that does not rely on power copper lines must remain in good working order for the safety and security of the population of New Zealand.



**Ref: 111-117**

**Date: 17/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**

Just to say that I regard it as my human right to retain my landline which uses old school copper network for safety reasons. If I had a landline via fibre and power goes out so does my phone, internet etc. There are also added expenses for old people if they had to have a landline on fibre e.g. a new communication box of tricks for a house alarm. This would be unfair to older people especially or those on low incomes



**Draft 111 Contact Code: Consumer feedback**

**Ref: 111-119**

**Date: 17/7/2020**

**What do you think of the information requirements? Is there anything else that should be specified?**

**What do you think of the process for people who need further support?**

**What do you think of the list?**

**What do you think of this proposal and what if any other solutions could be offered?**

**What do you think of this proposal?**

**Do you have any further feedback about the draft code?**

I am not uploading files; I would like to state that the copper wires are perfect and I do not want them changed. When disaster strikes and All networks go down (as they do) we need to be able to use our landlines. Copper is great and it always has been..

