

# Commission 111 Contact Code: Technical workshop

Commerce Commission, 44 The Terrace, Wellington  
9.2 Maia  
5 December 2019



# Welcome

- Health and safety
- Where we are at with the process
- Purpose of the workshop



# Workshop agenda

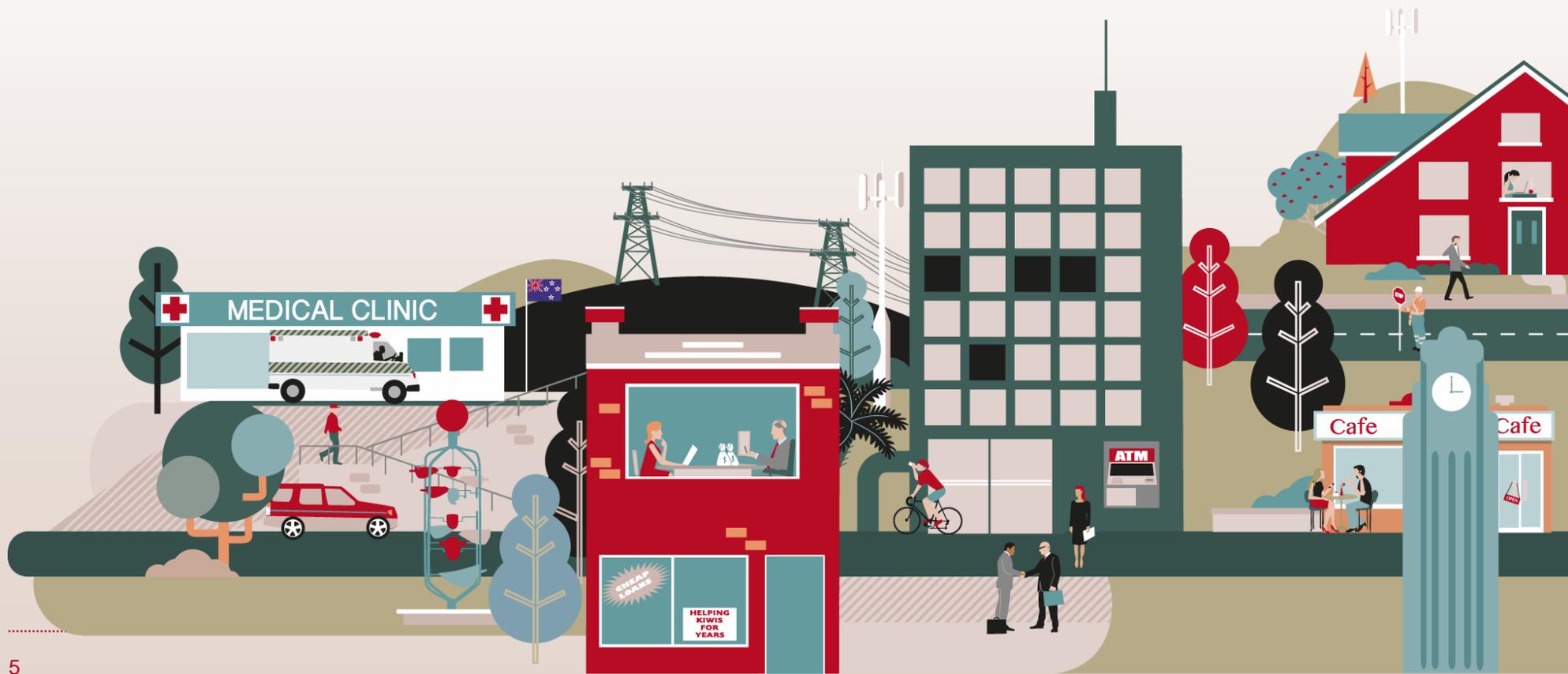
1	Welcome and health and safety <ul style="list-style-type: none"><li>Purpose of the workshop</li></ul>	5 mins
2	Session 1: Consumer outcomes and the 111 code (Simon) <ul style="list-style-type: none"><li>What are we trying to achieve?</li></ul>	20 mins
3	Session 2: Informing consumers (Ben) <ul style="list-style-type: none"><li>How to best communicate power issues and options for vulnerable consumers</li></ul>	45 mins
	Break	20 mins
4	Session 3: Processes for consumers to demonstrate they are vulnerable (Andrew) <ul style="list-style-type: none"><li>What are the existing processes in the industry?</li></ul>	45 mins
5	Session 4: Appropriate alternative means to contact 111 (Andrew) <ul style="list-style-type: none"><li>Suitability and challenges of mobile phones and other alternatives</li></ul>	45 mins
6	Next steps and close	5 mins



# 111 Code timeline



# Session 1: Consumer outcomes and the 111 Code





**New Zealanders are better off**



Markets work well

Consumers and businesses are confident

Strategic objectives



We will seize opportunities to have the greatest impact

We will protect, inform and empower consumers and businesses

We will be trusted, influential and high-performing

Strategies



Excellence

Integrity

Accountability

Respect

Good judgement

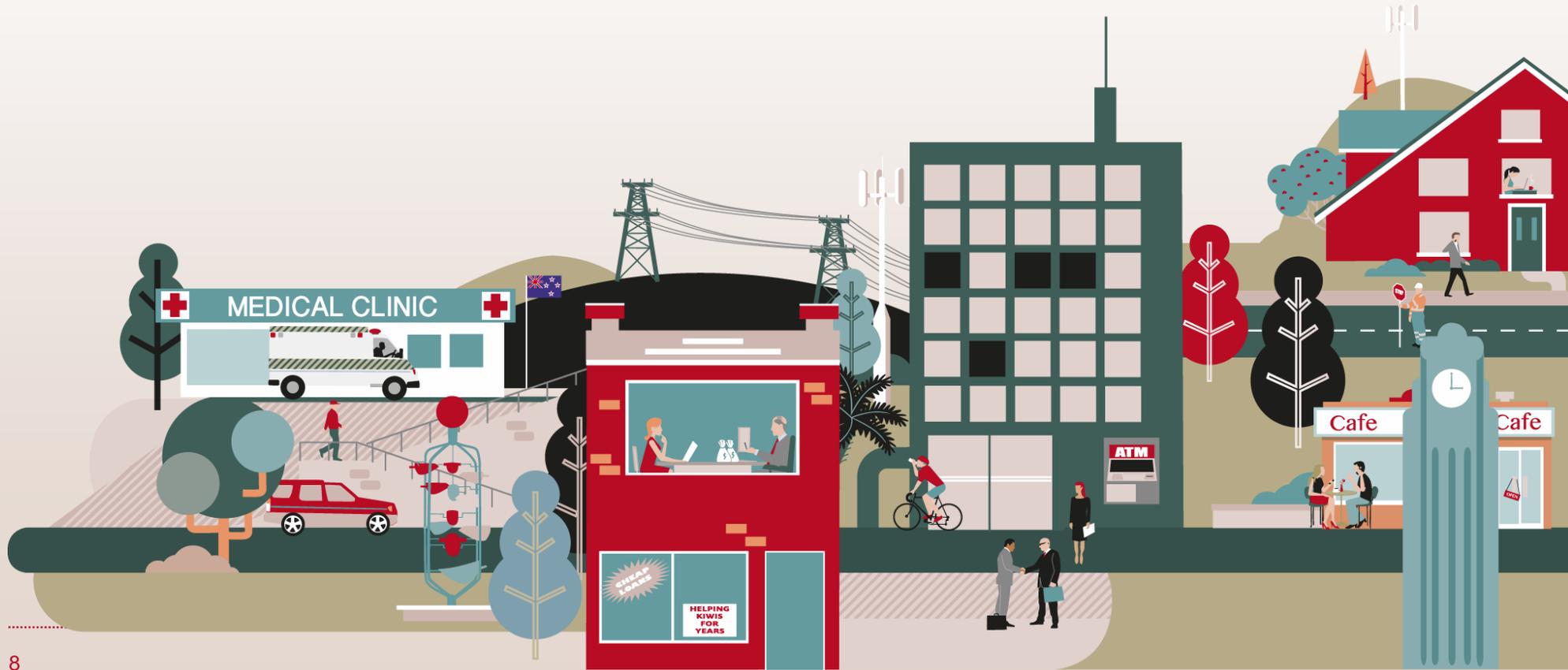
Values



# Consumer outcomes

- The market responds appropriately to consumer rights, needs and preferences.
- Consumers understand the different offerings available so they can choose the best service and provider for them.
- Consumers can confidently switch between services and providers in a low cost and convenient way.

# Session 2: Informing consumers



# Informing consumers

## Key issues

- Only vulnerable consumers will be provided with alternative means to contact 111, but all consumers should be informed of power-related issues and the options available to vulnerable consumers
- Currently consumer awareness of modern landline power issues appears to be low
- Vulnerable consumers will only self-identify if they are aware that their landline may be subject to power issues
- How should providers inform new and existing customers?



# Informing consumers

## What must the Code do?

- Section 238(3) states that the code must:
  - (b) require providers of those services to inform consumers about the options available for vulnerable consumers.



# Informing consumers

## Important things to know

- Home wireless landline is only available in certain 4G coverage areas. 4G coverage isn't available everywhere. We also have copper and fibre landline plans available in many areas. Fibre is only available where copper or wireless are not.
- You may only use your Spark wireless modem to receive the service at the installed location. If you use it at another location we may suspend, disconnect or restrict your home wireless landline service without notice. If you move house, let us know beforehand so we can check the options available at your new house and get you set up for your move.
- **\*\*Spark wireless landline requires a Spark wireless modem which requires mains power. In the event of a power failure, service will not be available, including access to emergency services. Make sure you have a charged mobile phone available for use in power outages including for emergencies.**

[Help & Support](#) > [FAQs](#)

## Will 2degrees Home Phone Plus work when the power goes out?

Your Home Phone Plus service plugs into your Modem which needs power to work. Therefore if there is a power cut in your home, your Home Phone Plus service will not work, and you won't be able to make calls (including emergency 111 calls).

If you live in an area which is prone to power outages, and you are heavily dependent on your Home Phone, then we suggest 2degrees Home Phone Basic which is delivered over a traditional copper line, and will still work in the event of a power outage as long as you are not using a cordless phone which is dependent on power.

## Does Home Phone Wireless work in a power outage?

Yes. Home Phone Wireless is delivered over Vodafone's mobile network. The device has batteries for both the base station and the handset, so it will continue to work if you have a power failure or if your power is disconnected for up to 2 hours - our mobile network also has power backups and will work in a power outage.

## Before moving onto VOIP

+ Monitored medical, home or office alarm

- In the event of a power cut

Voice calling over broadband won't work during power or broadband outages so you'd need to rely on the mobile network in case of emergency – this includes calls to 111 services. If your mobile coverage needs a boost, please call us on **0800 891 740** (**0800 888 257** for business calls) before you're upgraded to voice calling over broadband.



# Informing consumers

## Workshop questions – what happens now?

- How do you currently inform customers (or potential customers) about power issues with services?
  - Is the information on websites?
  - How is the information provided to those who don't have computer/internet access?
  - Is the information presented when customers sign up/switch?
  - Is the information only provided when prompted?



# Informing consumers

## Workshop questions – existing customers

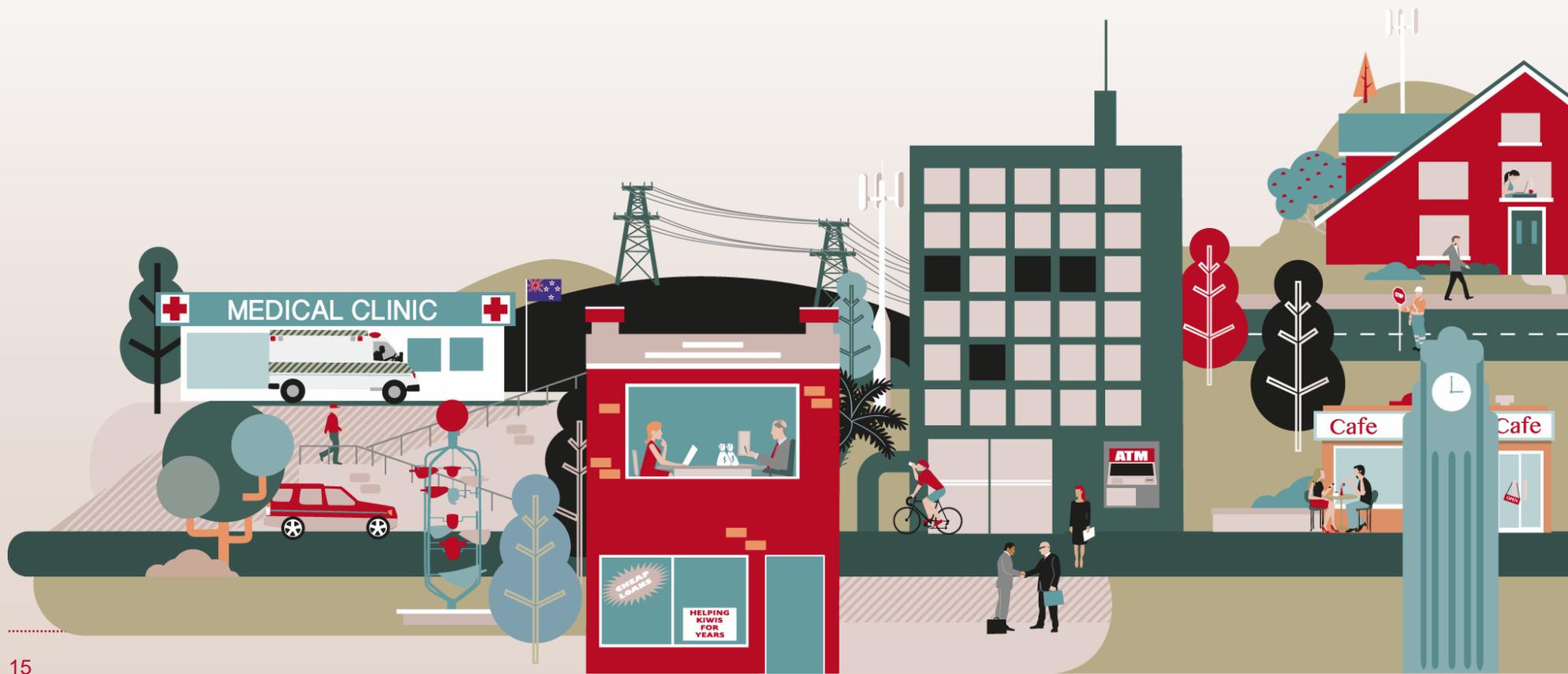
- Should all customers of services susceptible to power failure be informed upon the introduction of the code?
  - What are the challenges in contacting all existing customers on these technologies?
  - What are the costs and benefits to all customers of these services being periodically informed?



Break – 20 mins



# Session 3: Process for consumers to demonstrate vulnerability



# Process to demonstrate vulnerability

## What must the Code do?

Section 238(3) states that the code must:

- prescribe a process (or processes) for a consumer of those services, or a person on their behalf, to demonstrate that they—
  - are a vulnerable consumer; or
  - will become a vulnerable consumer:



# Process to demonstrate vulnerability

## Outline for the Session

- Consumers need to have a process to demonstrate that they are vulnerable (or will become vulnerable) and allow them access to an alternative means to contact 111 at no cost.
- Our main goal of this session is to understand what processes are currently in place within the Industry and what practical matters should inform the process for the Code.
- We also want to understand how detailed the Code needs to be on the process, and how to make sure that its application by industry results in reasonably consistently consumer outcomes.



# Process to demonstrate vulnerability

## Workshop questions

- What kind of processes do RSPs currently run that is similar or able to be adapted?
  - How do RSPs alert a customer to a process to assess vulnerability.? Do they currently ask questions when someone signs up?
  - How does a consumer currently apply and what stages do they go through?
  - What type of medical and police criteria do RSPs encounter on certificates, and how much discretion should the provider have to decide if the person is vulnerable?
  - Do they regularly contact these consumers to see if their situations have changed?
- How do we ensure that the approach is consistent across providers, so that the issue is addressed cohesively by the industry?
- What information do providers currently collect on vulnerable consumers and how do you store and use it?
- How will the process deal with consumers who have a copper landline now, but have it removed through the Copper withdrawal process?



# Session 4: Appropriate means to contact 111



# Appropriate means to contact 111

## What must the Code do?

We must make a code for the purpose of ensuring that vulnerable consumers, or persons on their behalf, have reasonable access to an appropriate means to contact the 111 emergency service in the event of a power failure.

The appropriate means must operate for the minimum period in the event of a power failure.

Section 238(4) states that the Code may also do one or more of the following:

- (a) specify appropriate means for vulnerable consumers, or persons on their behalf, to contact emergency services:
- (b) contain any other provisions that are necessary or desirable to achieve the purpose of the 111 Code.



# Appropriate means to contact 111

## Outline for the Session

- How we address **appropriate means** in the Code has implications for providers when considering options to contact the 111 service, including cost and practicality, and will impact consumers by informing them of options they may be offered or have access to from their provider.
- Our main goal of this session is to understand how our current thinking around principles might work in practice.



# Appropriate means to contact 111

## Discussion on how the principles might work in practice

Outline principles to inform the discussion are that Alternative means;

- are intended to operate where the existing service is supplied (eg, the home)
- should cater for any specific circumstances of a consumer (ie, they can use it)
- should be supported by the provider for the life of the service being provided
- should be provided with clear instructions on how to operate and maintain it
- must operate for the minimum period

We would like to discuss our principles in the context of three basic ‘lifecycle’ stages for an appropriate means.

1. Identifying an appropriate means for a consumer
2. Providing the appropriate means (ie, installation, instructions etc)
3. Ongoing support, switching and end of life replacement/disposal



# Appropriate means to contact 111

## Workshop questions

- What are the minimum requirements and additional guidance that providers need to assist them to provide good, fit for purpose solutions to individual consumers without undue cost?
  - Should we specify that the means must be fit for purpose for the consumer, and allow or require providers to assess consumers to determine a solution they can easily use?
  - How would the resolution of disagreements between consumers and providers over the options provided or presented to the consumer be handled?
- Do any providers see possible supply issues that could prevent them from offering certain alternatives, ie, batteries, mobile phones, copper landlines etc?
- How should the return or disposal of an alternative means work when a consumer switches or the alternative means reaches end of life?



# Contacts

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