



NEW ZEALAND  
**POLICE**  
Ngā Pirihimana o Aotearoa



**St John**



WELLINGTON  
**FREE AMBULANCE**  
your ambulance service



**17 July 2020**

**111 Contact Code**  
**Commerce Commission**  
PO Box 2351  
Wellington 6140

**Joint submission on the Commerce Commission's draft 111 contact code  
by New Zealand Police, St John New Zealand, Wellington Free Ambulance,  
and Fire and Emergency New Zealand**

Thank you for providing us with the opportunity to make a joint submission on the draft 111 contact code (the 'Code').

*We support the intention of the draft 111 contact code*

We support the intention of the Code, as the Code aims to ensure that vulnerable consumers, or persons on their behalf, have reasonable access to an appropriate means to contact 111 emergency services during a power failure.

The Code acknowledges that consumers may be left unable to call 111 emergency services in a power failure, due to the transition from old copper networks to new home phone technologies, which rely on electricity in the home to operate.

*There are broader risks that emerge from the transition to new non-copper networks, which the Code may not be able to ameliorate*

We acknowledge that the Code is not intended to be a telecommunications network resilience code as set out in the Commission's 2019 Views paper. We recognise that the Code's intended scope does not cover power failures that do not affect the consumer's premises, such as power failure to telephone exchanges or similar telecommunication infrastructure.

We believe it may, however, be beneficial for the Commerce Commission to consider the broader risks associated with changes being made to the way calls are carried across new non-copper networks. Some aspects of this risk is covered in our separate submission on the Commerce Commission's draft copper withdrawal code.

Essentially, in certain emergency events where transmission fails, vulnerable users with operating phones and power back-up may still be unable to contact 111 emergency services.

For example, in the event that the Alpine Fault magnitude 8 hazard scenario occurs, the West Coast of the South Island would lose transmission to the data centre in Christchurch. Even if power is restored on the West Coast, consumers would not be able to make calls until the transmission lines are repaired. Multiple

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breaks in the fibre cable may mean locating and fixing each point, which could mean hours and possibly days, depending on the number of breaks. During this time, residents would be unable to contact 111 emergency services.

Cellular on Wheels technology is unlikely to be an effective solution, as multiple devices would be required to connect the West Coast from Christchurch. Generators may also be required, as there may be no existing power source, which means there will be refuelling and maintenance needs to consider.

#### *Certification of vulnerable consumers*

We recommend that the Commerce Commission develops good guidance for 'persons of standing in the community' who can complete the form confirming that a person is a vulnerable consumer. This is because different professional persons may be better suited, or have more appropriate expertise, with different kinds of vulnerabilities a consumer may face. For example, Police officers may be more suited to certify a person who is subject to harassment or family violence, than other categories of persons of standing in the provided list.

Thank you for taking our feedback into consideration. Please contact us if you have any questions regarding this submission.



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