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Commerce Commission  
Wellington 6011  
By email: [regulation.branch@comcom.govt.nz](mailto:regulation.branch@comcom.govt.nz)

Tēnā koutou

### **Review of National Roaming: Preliminary view on consideration of deregulation of national roaming**

The New Zealand Nurses Organisation *Tōpūtanga Tapuhi Kaitiaki o Aotearoa* (NZNO) welcomes the opportunity to **support** the Commerce Commission retaining the power to force existing mobile phone operators to facilitate, or at least not impede, the rollout of new mobile services. NZNO is leading professional nursing association and union for nurses in Aotearoa New Zealand, representing over 52, 000 members delivering all levels of health care "24/7" throughout the country.

Whilst the regulation of mobile technologies is outside the scope of nursing expertise, access to them is not, as such tools are increasingly important.. Connectivity is critical to the implementation of the New Zealand Health Strategy<sup>1</sup> and the wide range of mobile health (m-health) initiatives designed to improve access to, and the quality of, health care. Many nurses, particularly those working in remote and rural settings which are often the poorest and disproportionately Māori (eg West Coast, Northland and East Coast), struggle with poor, patchy and intermittent reception which prevents timely access to patient notes, so that they have to be duplicated or transcribed, and restricts opportunities for assessment, early intervention and clinical advice<sup>2</sup>. Both patient health and the safety of nurses, often working alone, is compromised by poor connectivity and/or lack of interoperability. Inequitable access to m-health exacerbates health and workforce disparities, as it restricts opportunities to use innovation to reduce them. Accordingly NZNO strongly supports a robust regulatory regime for mobile technologies that ensures equitable access.

Nāku noa, nā



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<sup>1</sup> <https://www.health.govt.nz/publication/new-zealand-health-strategy-2016>

<sup>2</sup> Eg <http://www.choosingwisely.org/>

