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To:  
Commerce Commission

## Commission 111 contact code

To whom it may concern,

Wireless Nation Limited wishes to make a submission in relation to the proposed 111 contact code.

Wireless Nation Limited is predominantly supplying rural properties with broadband and as such proportionally more affected by the proposed code than predominantly urban internet service providers.

It is our opinion that the 111 contact code disproportionately disadvantages smaller telcos who already supply services where larger telcos stay away as it is too hard, too expensive and carries less margin. Adding an additional burden to smaller/local WISPs is potentially putting rural connectivity and the viability of such providers at risk.

Furthermore, we see the determination process of eligible customers as insufficiently defined and therefore it will be inconsistently applied, leaving room for time-consuming appeals and dissatisfaction for all parties involved.

We acknowledge the importance and need for the uninterrupted ability to call emergency services, especially for vulnerable customers.

In our view the following would be fair and reasonable:

1. One independent authority (i.e. WINZ) should determine eligible customers by one clearly defined set of rules. This will ensure consistency across NZ and not consume WISPs' time.
2. Any person residing within cell phone coverage should automatically be excluded as it can be reasonably expected that such a person already has a mobile phone or can reasonably be expected to buy a \$20 mobile phone from The Warehouse and even without sim card can still make 111 calls.
3. For remaining customers that need support, their ISP should be able to access public funds, such as the Telecommunications Development Levy to pay costs for the alternative.

Kind Regards,



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