

# Telecommunications Regulatory Funding Review

Thank you for the opportunity to provide input into your review of funding for the regulation of telecommunications and fibre.

The Internet Service Providers Association of New Zealand (ISPANZ) is the industry body representing internet service providers (ISPs). Our members are predominantly small to medium sized industry players.

Our members benefit from a clear and fair regulatory regime and agree in principle that it should be funded appropriately. We understand that additional costs to service providers will inevitably flow through to end-user pricing. We are therefore in favour of levies being minimised where possible, but understand the tension between this and the funding of a regulatory regime that makes the industry efficient and competitive, and thus benefits end-users.

We agree with the logic of having a separate Fibre levy in addition to a Telecommunications levy. We agree with the list of Fibre levy payers detailed in Paragraph 91.2 of the consultation paper.

We would welcome the increased engagement with smaller industry players outlined in Paragraph 196.3 and that is part of the 'Bridging the gap+' funding level. However, rather than advocating for the 'Bridging the gap+' funding level we would prefer a 'Bridging the gap' funding level, slightly enhanced to include this increased engagement with smaller industry players.



Best Regards,

David Haynes

Chief Executive

12<sup>th</sup> February 2021