

# **Proposal to vary Chorus' copper deed - SATP**

**7 October 2022**

**C H ● R U S**

## Introduction and summary

1. This submission responds to the consultation paper '*Chorus' proposal to vary its Deed of Open Access Undertaking for Copper Services to simplify updates to the Sharing Arrangements Transition Plan*', dated 13 September 2022.
2. Chorus supports the Commission's view that it should recommend the Minister of Communications approves the proposed variation<sup>1</sup> regarding updates to the Sharing Arrangements Transition Plan (**SATP**).
3. We agree with the Commission that:
  - 3.1 The requested variation will not impact competition in telecommunications markets;
  - 3.2 The requested variation will improve transparency by making the information about the sharing arrangements more accessible and understandable;
  - 3.3 The requested variation will not affect investment in telecommunications infrastructure and services; and
  - 3.4 The Commission can request more detailed information from Chorus on sharing arrangements if required.
4. As the Commission is aware, in 2022 we will publish our 11<sup>th</sup> SATP. It is reasonable to review the scale of this reporting requirement given the passage of time and the progress made in exiting systems to date. With ~80% of systems already exited, it is reasonable to streamline the reporting requirements. The degree of change in sharing arrangements has dropped significantly, being driven largely by systems reaching end of life and ceasing to be viable to maintain.
5. Under current requirements, considerable effort is needed to prepare each plan, including through review and sign-off processes. This is resource intensive, involving numerous senior staff.
6. We consider a simplified approach would continue to provide the Commission and Minister with appropriate oversight and visibility of our actions to transition away from Spark's systems, while reducing the resource and compliance burden on Chorus. The reasonableness of the burden is contemplated in the Deed (for example, clause 17.6).
7. We do not foresee any negative impacts from the variation to the Deed. It will simply improve the accessibility of the SATP report and reduce compliance costs to Chorus.

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<sup>1</sup> Consultation paper, paragraph 9.