

## Agenda for Specified Fibre Areas Technical Workshop

**When:** Thursday 18 July 2019 – 12:30pm to 5pm

**Where:** Commerce Commission, 44 The Terrace, Wellington - 9.7 Hiranga

### **Purpose of the workshop**

This technical workshop will detail our proposed approach to assessing [Specified Fibre Areas](#) (SFAs), which will be used for our initial and subsequent annual assessments. We will discuss the practicalities of implementing our proposed approach to assessing and declaring SFAs, and we are seeking feedback and support of this approach.

This workshop will not discuss the effect of SFAs or the content and practicalities of the Copper Withdrawal Code.

We will be testing our ideas and sharing staff views on our proposed approach. We will use the discussions at this workshop to better inform our ongoing decision making and to inform our SFA process. We therefore encourage attendees to actively participate and involve themselves in discussions to help.

Any views expressed by our staff will be to stimulate discussion and are not intended to reflect the views of the Commission. Once we have informed and made recommendation to Commissioner, the Commission's position will be reflected in the Specified Fibre Areas final decisions paper which is scheduled to be published in late August 2019.

The workshop will not be recorded or transcribed. Notes will be taken at the workshop and a summary will be published on our website along with all materials presented.

## Agenda items

We have produced a workshop paper for each session. Each summarises submissions we received, our current view and questions we are seeking an answer to in the workshop session.

1	Welcome and health and Safety <ul style="list-style-type: none"><li>• Purpose of the workshop</li></ul>	5 mins
2	Session 1: Assessment scope <ul style="list-style-type: none"><li>• What we need to consider</li></ul>	30 mins
3	Session 2: Assessment design <ul style="list-style-type: none"><li>• Defining available vs 'able to connect'</li></ul>	30 mins
	<i>Break</i>	20 mins
4	Session 3a: SFA definition <ul style="list-style-type: none"><li>• SFA granularity and naming conventions</li><li>• Proposed approach to assessments</li></ul>	20 mins
5	Session 3b: Data requirements <ul style="list-style-type: none"><li>• Data gathering mechanism</li><li>• Data sets standardisation and metadata</li><li>• Data exchange format and process</li></ul>	35 mins
6	Session 4: Data quality assurance <ul style="list-style-type: none"><li>• Technical certification</li><li>• Verification process</li></ul>	20 mins
7	Session 5: Communication and timeline <ul style="list-style-type: none"><li>• Publication of our assessments</li></ul>	20 mins
8	Next steps and close	5 mins

## What we must do

The [Telecommunications Act](#) requires that before 1 January 2020 we must carry out an initial assessment to determine the geographic areas in which a specified fibre service is available to end-users (**initial assessment**) and then undertake at least annual assessments (**annual assessments**) thereafter.<sup>1</sup>

Having determined a specified fibre service is available in a geographic area to end-users, we are required, by public notice, to declare that area to be a SFA. That notice must specify the date on and after which the area is to be an SFA (**effective date**); however, the initial notice must not specify an effective date before 1 January 2020. The notice may describe an area by any means.

Additionally, we must maintain a record of all SFAs and make that record available, at all reasonable times, for inspection on our website.

## Why we must determine SFAs

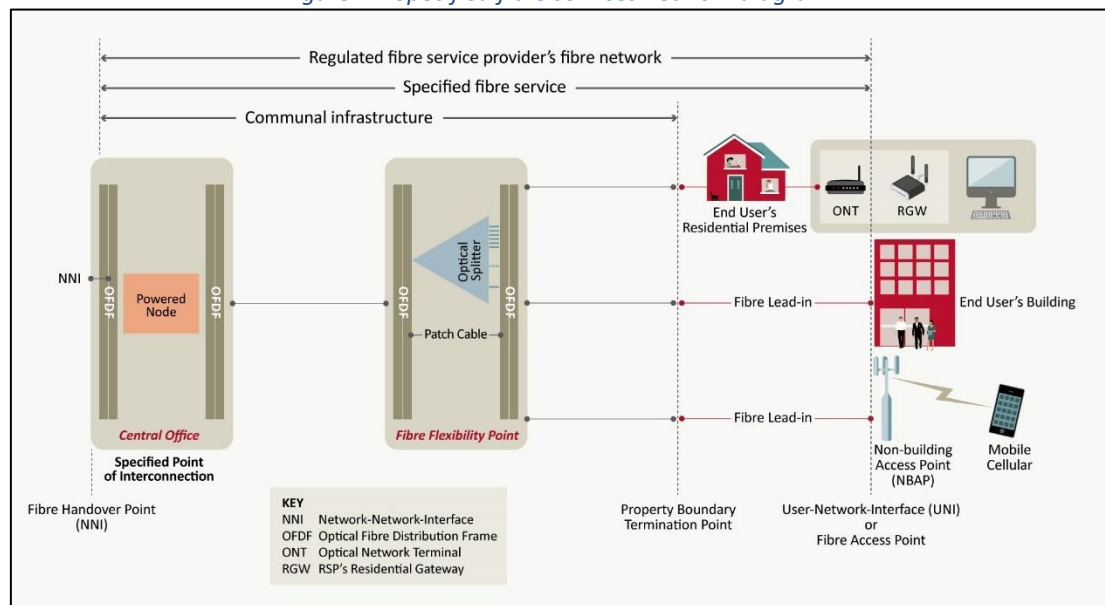
The declaration of an SFA is primarily an essential prerequisite to withdrawing copper fixed line access services under the [Copper Withdrawal Code \(CWC\)](#). The CWC will set out minimum consumer protection requirements for end-users of copper services during the transition to fibre.<sup>2</sup>

To protect the interests of end-users and the reputation of operators, our declarations must be timely and accurate to be trusted and relied upon. End-users and industry will rely on our SFA declarations to decide their future service needs and copper withdrawal plans and expect that if a premise is deemed to be within an SFA then a specified fibre service will be available when required.

## What we must consider

We consider the presence of a specified fibre service is a factual question for the purposes of declaring an SFA. A specified fibre service is a telecommunications service that enables access to, and interconnection with, a regulated fibre service provider's fibre network.<sup>3</sup>

Figure 1 – Specified fibre services network diagram<sup>4</sup>



<sup>1</sup> Section 69AB.

<sup>2</sup> Schedule 2A.

<sup>3</sup> Section 69AB (6).

<sup>4</sup> Determining specified fibre areas, Process and issues paper, 26 November 2018, page 15. Available from [https://comcom.govt.nz/\\_data/assets/pdf\\_file/0022/107572/Determining-specified-fibre-areas-Process-and-issues-paper-26-November-2018.PDF](https://comcom.govt.nz/_data/assets/pdf_file/0022/107572/Determining-specified-fibre-areas-Process-and-issues-paper-26-November-2018.PDF).

The importance of data quality is heightened as the Act does not allow for the removal of a property once it has been declared as being within an SFA. Our initial view was we need to put in place an appropriate data quality assurance programme to ensure our assessments are accurate.

**In our process and issues paper, we asked for views on:**

- |             |   |
|-------------|---|
| <b>Q1.</b>  | The appropriateness of our interpretation of our obligations.   |
| <b>Q2.</b>  | The appropriateness of our interpretation of 'specified fibre service' under S69AB (6).   |
| <b>Q3.</b>  | Whether our diagram is an accurate representation of a telecommunications service that is a 'specified fibre service' (Figure 1).                                       |
| <b>Q4.</b>  | The appropriateness and practicality of our interpretation of the term 'end-user'.  |
| <b>Q9.</b>  | We welcome your view on the timing and frequency of assessments, including the review period, publication, and phase-in period before a declared SFA becomes effective. |
| <b>Q11.</b> | Under what circumstances could an ad-hoc supplementary assessment be required?  |
| <b>Q13.</b> | If the criteria for supplementary assessments are satisfactory and appropriate  |

### What we heard in submissions

- There was general agreement with our interpretation of our obligations.
- Submissions recognised the SFAs and CWC work together to ensure there are appropriate protections in place for end-users of copper access services.
- It was generally recommended we take a broad approach to assessing SFAs based on premises passed and leave issues with end-user's ability to connect to be dealt the in the CWC.
- Chorus highlighted the need to include all specified fibre services such as non-UFB fibre networks including greenfield developments, priority connections and the potential for future exchange fibre overbuilds.<sup>5</sup>
- Enable Networks and Ultrafast fibre commented that as none of the services being deregulated under Part 2AA terminate at an access point which is not a building (non-building access points, NBAPs), the availability of fibre services to NBAPs does not need to be considered as part of our assessment of SFAs.<sup>6</sup>
- Three different reasons were given for phase-in periods:
  - Chorus supports a short phase-in period between declaring an SFA and the date it becomes effective so there is opportunity to identify and correct any errors;<sup>7</sup>
  - Spark argued that as Chorus can refuse to supply copper services to new customers from the effective date that RSPs need time to inform their customers of this; and<sup>8</sup>
  - There was also wide support for a notice period in which Chorus must advise stakeholders of the planned withdrawal of services under the CWC.
- Submitters recognised supplementary assessments may be required and these would best be addressed on a case-by-case basis rather than determining detailed criteria at this stage.
  
- There was general agreement with our proposed approach to completing an initial assessment followed by subsequent annual assessments of SFAs. Vocus was concerned by

<sup>5</sup> Chorus Submission on Determining Specified Fibre Areas: Process and Issues Paper, 26 November 2018, page 6.

<sup>6</sup> Submission of Enable Networks Limited and Ultrafast Fibre Limited (collectively LFCs) on NZCC process and issues paper on determining specified fibre areas, 14 February 2019.

<sup>7</sup> Chorus submission on Determining Specified fibre Areas Process and Issues Paper, 15 February 2019

<sup>8</sup> Spark submission on Determining Specified fibre Areas Process and Issues Paper, 12 February 2019.

the prospect of managing a flood of migrations from a 'national shutdown' should a large proportion (75%) of New Zealand be declared an SFA on or after 1 January 2020.<sup>9</sup>

### Our current view

We remain of the view we are required to assess and declare SFA based on whether a specified fibre service is available to an end-user, and this would include NBAPs.

Our current view is assessments should be carried out 'reasonably broadly' and that it should be based on a definition of premises passed that includes regulated service provider's UFB and non-UFB fibre networks (see Session 2).

Further, our focus should be the availability of specified fibre services. The ability for an end-user to connect to an available service is best addressed under the CWC. We consider issues pertaining to end-user's connection to service provider's fibre network and the migration to fibre in general, including the notice period for the planned withdrawal of services, is best be addressed in the CWC.

We think our SFA assessment process should allow a process for errors to be identified and clarified with regulated fibre service providers. We are therefore proposing a process for verification (see Session 4).

We acknowledge it may also be beneficial to allow time between an SFA declaration and the effective date.

Our current view is that any supplementary assessments will be on a case-by-case basis rather than specifying criteria at this stage.

### Workshop questions

- 1.1. What are the benefits and costs of a delay between the declaration of an SFA and the effective date?
- 1.2. How much time, if any, should we allow between the declaration of our initial assessment of SFAs and the effective date?

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<sup>9</sup> Vocus, Cross submission to Specified Fibre Areas and Copper Withdrawal Code, 1 March 2019.

### What we must do

For our SFA assessments, we are required to determine the geographic areas where specified fibre services are **available** to end-users. We therefore must define what available means for a specified fibre service.

### Our initial view

We had considered available to mean a specified fibre service exists and an end-user is able to connect to service provider's fibre network.

We noted that our understanding from the industry was that a 'specified fibre service' will exist when:

- the communal fibre network has been built to the regulated fibre service provider's specifications, and has been recorded as operational in the regulated fibre service provider's management and operational systems;
- an end-user's premises is deemed 'passed' by the communal network when its associated address point, as defined in the latest address dataset, has:
  - already been connected to the communal network (an active or inactive intact connection); or
  - can be connected with minimal civil construction at the property boundary; or
  - in the case of multi-dwelling units, to a defined delivery point within the property's boundary; and
  - the address point is shown as 'Active' in the regulated fibre service providers systems such that an RSP or WSP can place a new connection or service activation request with the expectation that service will be provided within an accepted industry time frame.

### In our process and issues paper, we asked:

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|------------|---|
| <b>Q5.</b> | We welcome your views on the criteria for fibre being 'available' to end-users.   |
| <b>Q6.</b> | We invite your views on how we can determine the locations of end-users' 'other access points' within NZ.   |
| <b>Q7.</b> | We invite views on whether we need precise information on where specified fibre services are located in NZ, including the location of regulated fibre service providers' fibre networks and fibre handover points (e.g., through coordinates or GIS information). |

### What we heard in submissions

Our assessment of availability should be carried out 'reasonably broadly' based on premises passed by a regulated service provider's fibre network, specifically:

- in UFB areas this should be based on premises passed as per the UFB contracts; and
- in non-UFB areas (e.g. Greenfields) in accordance with the service provider's records and appropriate quality assurance processes.

Further, we heard having a specified fibre service available is sufficient for the declaration of an SFA and the test of whether an end-user is able to connect to the services is more onerous and is dealt with under the CWC.

**Our current view**

For the purposes of deregulating copper services, we are required to assess the geographic areas in which specified fibre services are available to end-users.

Chorus may stop supplying copper fixed line access services in an SFA if the requirements of the CWC have been met or an end-user disconnects the service for reason other than for the temporary disconnection.<sup>10</sup>

Further, our SFA assessments does not need to address issues pertaining to end-user's actual connection to service provider's fibre network and migration in general as these are best addressed in the CWC (see Session 1).

We remain of the view the existence of a 'specified fibre service' is a factual question concerning UFB and non-UFB fibre fixed lines access services.

We remain open to using a modified definition of 'premises passed' as the basis for determining SFAs. We are mindful what Chorus and the other LFCs may have reported to Crown Infrastructure Partners (CIP) as premises passed may not record all situations where a specified fibre services is available due to the definitions of 'premises' and 'premises passed' given in the UFA agreements.

We propose that available means a primary survey land parcel in the LINZ title database that can connect to the regulated service provider's fibre network (UFB or Non-UFB) from a premises boundary termination point without further civil works required on the Communal Infrastructure or outside the premises boundary.<sup>11</sup>

**Workshop questions**

- 2.1. What is a suitable definition of 'available' for assessing SFAs?
- 2.2. Is our proposed definition of 'available' suitable for the purpose of declaring an SFA?

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<sup>10</sup> Section 69AC.

<sup>11</sup> Where regulated service provider and fibre network have the meaning given under the act, and premises boundary point has the meaning given in the NIPA.

### What we must do

We need to develop a method for identifying, categorizing and reporting areas where a specified fibre service is available to an end-user. Additionally, we must communicate the location of SFAs to interested stakeholders in a clear and effective way.

### Our initial view

SFAs will be the aggregate of all the end-user's locations where 'specified fibre services' are available. Our view was that the minimum size of an SFA needs to a level of granularity that interested parties can identify a particular end-user location (for example an address point and property boundary). It is important to be able to identify individual end-user locations so that this information can be used to determine if Chorus is meeting the conditions of the CWC.

We require regulated fibre service providers to provide the following information for our assessments:

- GIS shape files detailing the as-built location of communal fibre access network assets;
- GIS datasets detailing the LINZ property parcels and addresses points the communal fibre access networks are deemed to be passed and for which an order for provision of service can be placed, i.e., the address point is 'Active' within the service provider's system.

### In our process and issues paper, we asked:

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|-------------|---|
| <b>Q8.</b>  | We invite views on the suitability of using LINZ data to determine end-users' address points and property boundaries within NZ compared to other available data sets.                             |
| <b>Q10.</b> | We welcome your views on the adequacy of the data requirements for SFA assessments. If you consider additional data is required, please provide details.  |
| <b>Q19.</b> | We welcome your views on the adoption of UFB area names as a narrative description of SFAs and of alternative naming conventions that interested parties, including end-users, can identify with. |

### What we heard in submissions

There was general support for our proposed process. Submissions emphasised the process needs be simple and should utilise existing information and processes, specifically:

- GIS and address information are required to identify premises where specified fibre services are available to end-users;
- we should use existing processes developed for reporting premises passed to CIP;
- our assessment needs to include premises that weren't part of the UFB contracts;
- there were concerns about the reliability and completeness of the LINZ street addresses data; and
- there were no immediate concerns about the proposed SFA naming convention, however, we heard that a common name would be easier for consumers to understand.

### Our current view

As addressed in Session 2, the definition of premises passed under the UFB agreements may not capture all circumstance where a specified fibre service is available to an end-user, so we need to define available in the context of our SFA assessments.

We originally proposed using the UFB candidate area names as the description for the SFAs. However, we now consider the NZ Localities/suburb/area names to be a better alternative as it will be meaningful to end-users and other stakeholders.



Only the regulated fibre providers truly know the location of where specified fibre services are available at an end-user's premises. We believe the key information we need to our SFA assessments can be provided in a simple.csv file using existing reporting processes. We outline our proposed approach below.

### Our proposed approach to assessing SFAs

1. Chorus and other LFC's provide a list (.csv) of addresses and geographic coordinates of premises where specified fibre services are available to end-users. This includes premises where specified fibre services are available outside of the UFB contracts. We understand regulated fibre providers provide this or similar information to CIP as part of their UFB reporting obligations, e.g., premises passed and user acceptance testing results. This information is also available on various fibre availability maps online.
2. We consider the LINZ Primary Survey Parcels to be an appropriate dataset to form the basis of SFAs. We consider this dataset appropriate as it is freely available (public information), it's the basis of the CoreLogic address dataset, and the NIPA's reference premises being located on a defined geographical site as may be evidenced by the LINZ title database.



This dataset is a definition of land that is intended be:

- Owned by the Crown
- Held in fee simple
- Maori freehold land or Maori customary land
- Public foreshore and seabed
- The bed of a lake or river
- Road or Railway
- Vested in a local authority

We propose to overlay the address information, supported by GIS coordinates, onto the LINZ Primary Survey Parcels to determine properties with access to specified fibre services.



3. We then propose to use the 'New Zealand localities' dataset to identify and name the extent of each SFA.

This dataset has been developed by the New Zealand Fire Service as part of a consortium of agencies to provide support for enhanced emergency response, postal addressing and property information. The consortium includes Quotable Value New Zealand (QV), New Zealand Post, LINZ and representatives from territorial authorities.



### Workshop questions

- 3.1.** Are there any further concerns about our proposed use of LINZ Primary Survey Parcels as the basis for our SFA assessments?
- 3.2.** How should multiple premises on a survey parcel be addressed when one or more premises has access to a specified fibre service and one or more does not? For example, corner sites and sites with multiple address.
- 3.3.** How should multidimensional property be addressed? For example, Waterview Tunnel?
- 3.4.** What concerns do you have in generating a list (.csv) of premises passed where specified fibre services are available?

## What we need

To identify and have confidence in the geographic areas where specified fibre services are **available** to end-users we require address and GIS information of the premises where specified fibre services are available.

## Our current view

We anticipate use of the following datasets:

1. Specified fibre service information from regulated fibre service providers

We anticipate address records (data) could be supplied in the following format:

Field Name	Description	Field Type	Required
<b>UID</b>	Unique identifier of premise from LFC system	Text (20)	Yes
<b>Address</b>	Full Address Number of premises	Text (20)	No – Optional
<b>Road Name</b>	Road Name of premise	Text (20)	No – Optional
<b>Suburb</b>	Suburb / Locality Name of premise	Text (20)	No – Optional
<b>UFB POI</b>	The ID/Name of the UFB POI that provides fibre to the premise	Text (20)	Yes
<b>NZTMX</b>	NZTM X (Easting) coordinate of premise	Decimal	Yes
<b>NZTMY</b>	NZTM Y (Northing) coordinate of premise	Decimal	Yes
<b>Description</b>	Any additional information to provide clarification of the premise	Text (250)	No – Optional
<b>Parcel ID</b>	LINZ Parcel ID of the premise	Integer	No – Optional
<b>Service Type</b>	Code indicating if premise is CIP UFB authenticated, pre-UFB, non-UFB, etc	Text (10)	Yes
<b>Additional fields</b>	<i>Any additional information that the LFC deems appropriate</i>	<i>Varies</i>	<i>No – Optional</i>

Additionally, for cross-checking purposes, we propose regulated fibre providers supply:

- GIS shape files of the as-built location of the communal fibre assets used to deliver specified fibre services inside and outside of UFB candidate areas,
- a copy of the relevant fibre coverage map as is published online.

2. Other datasets

We currently anticipate the Commission will also use the following LINZ datasets:

- NZ Street Address (<https://data.linz.govt.nz/layer/53353-nz-street-address/>)
- NZ Roads (Addressing) (<https://data.linz.govt.nz/layer/53382-nz-roads-addressing/>)
- NZ Primary Parcels (<https://data.linz.govt.nz/layer/50772-nz-primary-parcels/>)
- Landonline: Title Parcel Association (<https://data.linz.govt.nz/table/52008-landonline-title-parcel-association/>)

Note: the LINZ street address will not be used for definition of premises but will be used for address searching on a public web site and may be used for data validation checks. The LINZ roads dataset will likely be used for searching on a public website.

The Commission will use the following New Zealand Fire Service datasets:

- New Zealand Localities (<https://www.linz.govt.nz/about-linz/our-vision-purpose-and-values/our-location-strategy/geospatial-data-themes-and-datasets/administrative-boundaries-theme/nz-localities-suburbs-dataset/>)

### Datasets standardisation and metadata

The coordinates of the premise should be standardised in terms of the New Zealand Transverse Mercator (NZTM) projection, i.e., EPSG:2193.

Chorus and the other LFCs should provide, for each dataset, metadata based on the ANZLIC Metadata standards (<https://www.linz.govt.nz/about-linz/what-were-doing/projects/anzlic-metadata-profile/>). The metadata requirement will not be extensive and will align with the minimum requirements of the ANZLIC standard. The Commission will likely provide a metadata template and example.

### Data transfer mechanism

We are interested in hearing views on how to transfer and receive datasets and information generally. We consider that the use of the secure drop-box that is used for the exchange of existing annual fibre information disclosures would be an acceptable option.

### Data gathering mechanism

We are interested in hearing views on the appropriate mechanism for acquiring the required information from regulated fibre service providers. We believe the information is readily available from existing systems (subject to scripting requests from those systems). We consider the necessary information may be able to be provided to us voluntarily given this, or similar information, is available on websites (e.g. fibre coverage maps) and internally in pre-qualification service requests.

### Timing

The issue of when data can be made available to us for the initial assessment of SFAs will be discussed in Session 5. Regardless, we will require information to be provided so we have sufficient time to:

- carry out quality assurance checks;
- provide and receive feedback on any identified anomalies in the data; and
- determine the extent of the SFAs.

We will address the subject of data quality assurance in Session 4.

### Workshop questions

- 3.5. Are there any concerns with the practicality of being able to provide the data we have identified as required to assess an SFA?
- 3.6. Will a secure drop-box be a suitable data transfer mechanism? What alternatives are there?
- 3.7. Is this information able to be provided on a voluntary basis? What barriers would prevent information being made available to us on a voluntary basis? How can we help facilitate this information being provided?
- 3.8. What general rules should be applied to enable us to undertake a check for errors and omissions?

### What is required of us

We must be confident that our assessments of SFAs are accurate and reliable. End-users and industry will expect that if a premise is deemed to be within an SFA then a specified fibre service is available when required. As noted earlier, the importance of data quality is heightened as there is no mechanism to remove a property from an SFA once it has been declared.

### Our initial view

Our view was that, given the nature of the task, the data involved, and the effect of SFAs, we must put in place an appropriate quality assurance programme. This will include confirming the accuracy of data the regulated fibre service providers provide.

We consider that an assurance regime similar to the technical certification currently provided under out existing fibre information disclosure determinations would be sufficient.<sup>12</sup>

### In our process and issues paper, we asked:

- Q16.** We welcome your views on how we should ensure quality assurance of the data provided.
- Q20.** Are There any other aspects of data confidentiality that we need to consider?

### What we heard in submissions

The level of certification provided for the current fibre information disclosure regime was not appropriate. However, the current testing acceptance processes with CIP in UFB areas, and the in-house technical certification program you have in non-UFB areas should be leveraged for providing assurance that the data is accurate for the purpose of declaring SFAs.

There was little concern for the confidentiality of the information as it is largely already publicly available online.

### Our current view

Only the regulated fibre providers truly know the location of where specified fibre services are available at an end-user's premises. We need to be satisfied the information provided to us for assessing SFAs is complete and accurate. However, the extent to which we can validate the completeness and accuracy of data provided to us is limited. We therefore must rely on regulated fibre service providers providing us with assurance that the information provided has undergone internal quality control and is fit for the purpose.

We consider the testing and certification processes Chorus and the other LFCs have followed in UFB (with CIP) and non-UFB areas is evidence of a fibre network being installed and commissioned. Therefore, technical certification that communal fibre has been installed and commissioned to those standards would seem to be a reasonable level of assurance to be given for the purpose of assessing a specified fibre service is available.

We consider a statement of assurance similar to that given for non-financial information provided under the current fibre information disclosure regime a useful framework for the certification of information provided for the purposes of assessing an SFA.<sup>13</sup>

<sup>12</sup> Determining specified fibre areas, Process and issues paper, 26 November 2018, paragraph 95, page 23. Available from [https://comcom.govt.nz/\\_data/assets/pdf\\_file/0022/107572/Determining-specified-fibre-areas-Process-and-issues-paper-26-November-2018.PDF](https://comcom.govt.nz/_data/assets/pdf_file/0022/107572/Determining-specified-fibre-areas-Process-and-issues-paper-26-November-2018.PDF).

<sup>13</sup> Chorus and LFC information disclosure determinations are available from <https://comcom.govt.nz/regulated-industries/telecommunications/regulated-services/fibre-regulation/ultrafast-broadband-information-disclosure>.

To have further confidence in our assessments, we believe a procedure should be built into the assessment process that allow for the cross-checking of data (verification) with regulated fibre service providers before we published our final SFA.

We propose that once the regulated fibre service provider has verified our draft assessment of an SFA, a statement of assurance is provided from a technical expert at each regulated fibre service provider to confirm the data provided (i.e. the list of property boundaries covered by the SFA) is accurate and meets the relevant criteria for availability. We imagine that the Commission will provide some draft text for this assurance, and any further caveats about the data (confidentiality etc) can be included in this data quality assurance sign off from the regulated fibre service provider.

**Workshop questions**

- 4.1.** What is an appropriate level of assurance to give on SFA assessment data?
- 4.2.** Are there any concerns with our proposed approach?

### What we must do

We must, before 1 January 2020 and at least annually thereafter, carry out an assessment to determine the geographic areas in which a specified fibre service is available to end-users.

Having determined an SFA we are required to:

- declare an area, by public notice, to be a SFA; and
- maintain and make available a record of all SFAs on our website.<sup>14</sup>

Additionally, we need to consider when and how we communicate with interested stakeholders.

### Our initial view

Our initial thoughts were:

1. to have a set date for the annual assessment that is scheduled around other business planning and reporting dates to minimise compliance costs; and
2. we would publish:
  - a. on our website a web application that shows the aggregate of the derived end-user locations declared to be a SFA; and
  - b. we would make available aggregated GIS shape files (.shp), including metadata, but not the detailed information from which the areas were derived.

### In our process and issues paper, we asked:

- |  |
|--|
| <p><b>Q14.</b> We welcome your views on the timing of the annual assessments.</p> <p><b>Q18.</b> Are there any other relevant documents or data we should make available of our assessment(s)?</p> |
|--|

### What we heard in submissions

There should be protocols around how end-users are communicated to and the content of that communication.<sup>15</sup>

The information we each publish must be up to date and accurate. To enable that to occur, submitters supported having time in the process to, amongst other things, identify and correct errors.

There was also support for having a fixed date for the annual assessments.<sup>16</sup>

### Our current view

In principle we agree there should be set of protocols (expectations and timeline) for our communications and how we communication SFA declarations to interested parties, including end-users and RSPs.

Chorus and the other LFCs currently make their fibre information disclosures by 30 November each year. We remain open to synchronising information gathering for annual SFA assessments with the November disclosure or other annual reporting period should that be beneficial. However, as mentioned previously, we will need information earlier for our initial assessment.

<sup>14</sup> Section 69AB (2)-(5).

<sup>15</sup> Vocus communications, Determining Specified Fibre Areas Process & Issues Paper Submission to Commerce Commission, 14 February 2019, paragraph 14.

<sup>16</sup> Chorus submission page 21.

**Workshop agenda items**

We are interested in hearing views on a high-level communications protocol and timeline that allows time for the exchange and the validation of your data and of our proposed declaration, before the final declaration is published.

The initial assessment must be made before 1 January 2020 therefore we are constrained by the time we have to complete this task. The following process diagram (Figure 2) is intended to focus workshop discussion on the initial assessment while presenting a possible 'strawman' for subsequent annual assessments.

**Workshop questions**

- 5.1. Does this timeframe work for the initial assessment? Have we identified the key steps of the communication process? If not, what changes need to be made?
- 5.2. What is the best time for the annual assessments going forward?



Figure 2 – Draft communications process and timeline for initial assessment of SFAs.

