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Marketing of alternative services to consumers during copper and PSTN withdrawal

The Commissions initiative is a fantastic opportunity to provide better outcomes for consumers. Rural Connect welcomes the opportunity to comment from a rural perspective.

Our background

We are a non-commercial volunteer group of telecommunications, management & IT professionals that advocate for better rural connectivity.

While we live and work in rural NZ, we are not farmers. Instead we work alongside rural people, in many cases, family businesses in agriculture, aquaculture, horticulture, hospitality and tourism. We provide free technology support to many in our community to help ensure people get the best value from solutions and the many choices available.

Outcome 1: Consumers are given appropriate notice of any change

We fully support.

Outcome 2: Consumers are given sufficient information to decide what alternative telecommunications service is best for them as they transition off copper-based services.

Choosing a service in rural NZ is particularly complicated because multiple technologies are *sometimes* available (eg DSL, LTE, WISP, GEO satellite, LEO satellite). Consumers would benefit if there was a source of independent information/advice on the various telecommunication services available.

Many consumers have limited interest, or understanding, of telecommunications technologies, and can be consequently easily misled. It is a constant for us to be advising businesses and families that are locked into contracts of inappropriate or less affordable solutions.

[Powerswitch](#) provides an independent service for selecting electricity providers, however we accept that a similar service for telecommunications services would require significant funding.

LEO satellite service is now widely available in rural New Zealand. At the time of writing, Internet New Zealand's www.broadbandmap.nz did not show satellite as an option.

Outcome 3: Consumers are given clear and accurate information about the technical and performance characteristics of alternative telecommunications services.

The scope of the speed claims clause should also include network providers. For example, the [Chorus broadband speed checker](#) does not factor in potential backhaul congestion (ie non-fibre LAPS). (It appears to report the DSL line rate rather than the actual performance of the internet connection.) For ADSL lines the Chorus tool can over report speed by a factor of at least 20.

RSPs may take the PSTN closure as an opportunity to move their customers from copper to fixed wireless. This may lead to increased congestion on fixed wireless networks. Information on the minimum performance standards should be available to the consumer.

Outcome 4: Consumers are given information on how moving from copper telecommunications services to alternative telecommunications services could impact the operation of their home equipment.

We are aware of cases where subscribers are being encouraged to move to "VoIP over ADSL" services even when they have poor performing internet. The result has been that the consumer has unreliable telephone service and has had to ask to switch back.

Before offering VoIP to a consumer, the RSPs should be screening the broadband connection to ensure that it is capable of reliably supporting the proposed VoIP service.

It should be noted that some RSPs choose not to use Chorus's "Baseband IP" even where the broadband connection is poor and this is a viable solution.

Lack of QoS means that some VoIP over ADSL services do not meet the standards set out in the TCF "[Emergency Voice Calling Services Code](#)". Eg "18.2.1 The Voice Service supports a Voice Quality for Emergency Calls of $R \geq 65$ for 95% of calls, and $R \geq 50$ for 99% of calls"

Outcome 6: Consumers understand their rights to their landline number

Consumers in some areas are being informed that their current provider will be unable to provide a landline after Spark closes the local telephone exchange. (This is well before the exchange is due to be closed).

Some RSPs are unwilling to offer landline service to specific customers after PSTN closure due to limitations of the broadband connection (eg ADSL). (This is more common where there is also a lack of fixed wireless availability)

Where the RSP wishes to discontinue supplying landline services, the consumer should be informed of any rights under the [ISO](#). Spark call centres have avoided questions related to the TSO requirements. It may be useful if the Commission/MBIE published some guidelines on how the TSO relates to the migrations.

Outcome 7: Consumers should know where to go to resolve any issues associated with the marketing or performance of alternative services as they move off copper.

The TDRS's scope specifically excludes a particular issue that customers may encounter when moving to alternative services. The TDRS "Customer Complaints Code" excludes broadband congestion from its scope: *"18.1.21. if it relates to Broadband congestion or speed, unless the Broadband service is sold with a Committed Information Rate"*

Congestion on rural fixed wireless networks is an issue for many consumers. There is a lack of transparency of minimum performance standards and the achieved performance. This is increasingly a concern now that uncapped rural plans are becoming common.

A consumer moving from VDSL to fixed wireless may well experience issues due to congestion. There should be a place that consumers can go if the issue is congestion related (other than the Disputes Tribunal or the courts).

Should the TDRS's scope be increased to cover congestion? What remedies should be offered to the consumer? What are the minimum acceptable performance standards? How can the consumer prove congestion? All difficult questions that the industry must resolve.

Summary

- Some RSPs are currently promoting unreliable "VoIP over ADSL" services
- Consumers need to be advised of what to do if their RSP discontinues the phone service
- There is some confusion on whether the TSO still applies.
- Choosing a rural broadband service is often very complicated for the consumer
- The consumer has little protection against the occurrence of congestion on the new technologies being promoted by the RSPs (the TDRS scope excludes congestion)
- Consumers need a clear path to exercise their rights under the new policies. A system is required that works in a practical sense for the consumer, the provider and the Commission.

Regards

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