

**Submission on  
amendment to net  
unplanned downtime  
definition**

**31 October 2024**

**C H ● R U S**

## Submission

1. This is Chorus' submission on the Commerce Commission's (**the Commission**) proposed amendment to the definition of net unplanned downtime.
2. We appreciate the Commission's response to our submissions on the draft Fibre Input Methodologies (**fibre IMs**) amendments and the draft price-quality (**PQ**) decision.
3. The Commission states that having regard to those submissions, it proposes to "preserve the status quo for PQ reporting by Chorus and ID reporting by LFCs for PQP2, with a move towards a revised approach that fully reflects our original policy intention for PQP3."
4. We agree with the Commission's proposal to retain the status quo for PQP2. As noted in our submission on the PQ draft decision, any material changes to the definition of outage would require time to consult with the industry and for industry-wide reporting to be then developed for regulatory purposes.
5. We agree with the Commission's proposed definitions as set out in the consultation to:
  - 5.1 Amend the definition of net unplanned downtime to:
    - (a) replace the term 'fault' with 'outages'; and
    - (b) narrow the definition to reported unplanned downtime to exclude self-identified outages and the time of an outage before it is reported.
  - 5.2 Introduce a new definition for reported unplanned downtime to clarify that the time to be measured begins from when an outage is reported.
  - 5.3 Delete the definition of unplanned downtime.
6. We also support the introduction of a new definition of outage notification as being "a notification of an outage to a connection that gives Chorus sufficient information to identify the connection". However, the definition would be improved if it also clarified that the notification comes from an end-user or RSP, rather than another party. The definition should read:
 

<b>outage notification</b>	is a notification of an <b>outage</b> to a <b>connection</b> <i>submitted to Chorus by an access seeker or end-user</i> that gives Chorus sufficient information to identify the <b>connection</b> ;
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7. This amended definition would ensure that ensure the notifications relate to customer reported outages and do not overlap with self-identified outages (e.g. if one of Chorus' third party suppliers notifies us of a potential outage). We believe this change better reflects the Commission's intention that measures of unplanned downtime capture reported faults only and facilitate continuation of existing measurement.
8. We continue to support an industry workshop to resolve any ongoing ambiguity around the definition of outage in the IMs in the longer term and will work with interested parties as required to achieve this.