Commission 111 Contact Code - Feedback Submission on Emerging Views paper - 14 October 2019

No.	Date Received	What do you think of our approach to ensure that everyone has an appropriate way to call 111 in a power cut?	How else could we protect vulnerable consumers who may need to call 111 in a power cut?	What should retailers have to provide vulnerable consumers with so they can call 111 in a power cut?	Following a power cut, what is a reasonable time period that a service should work for?
1	12/09/2019	Good, but not good enough.	How else?	A landing page with accessible 111 emergency services.	A reasonable time?
		Vulnerability is a moving feast. For example, a girl may be cut off from emergency services by an abusive uncle who turns off a modem. Or a storm that wipes out the grid by the coast, but not the ISP tower up the hill. Or a substation electricity failure that darkens a whole area, but, again, not the towers with emergency power.	For towers on solar, a similar backup, linked in with local power distributors. Such backups to be	In the event of a power cut, all mobile cellphone users within tower frequency get an automated SMS text that contains a link to an always-on webpage for emergency services. Such a webpage should be easily memorable e.g. 111.nz Any super-provider, e.g. Chorus, should also provide legacy copper links to a landline phone within one hours walking distance of any NZ residence. Source: an inspiration for the one hours walking distance was a 1996 advertisement for Solomon Islands Telekom to its citizens, promising 24/7 phone	Ideally, endless. Christchurch earthquakes are an example of the hours, days, weeks timeframes that applied for restoration of power services. To conclude, light-handed legal obligation towards providers that *can* technologically offer emergency services should be replaced with a heavy-handed legislative approach to help ensure safety for all New Zealanders. Safety should not depend on money, nor power.
				access by 1999.	
2		It is very important. I live in an area where the mobile signal is intermittent - sometimes I only have to move one step and the mobile call cuts out. I am concerned that if I have to rely solely on a mobile call there may be difficulty to contact emergency services.	I don't know.	Comprehensive mobile network coverage so there are no blackspots in residential areas.	Until power is restored.
3	13/09/2019	Best option yet would be to have all fibre connections on UPS Battery backup and make it mandatory that the network operators provide the hardware to do it	the only option due to the way fibre works is going to be either battery backup or mobile. the only issue comes into with the elderly who don't like mobiles	embedded mobile connections in their routers. to there provider using options like E-SIM which will still allow the customer to switch provider.	depending on location and depending on the network involved. it should be designed to provide for the average length of an outage in that region. not based on an arbitrary number of minutes. because outages in non-major suburban areas are typical longer
4	13/09/2019	Technically that is a grand plan but really - making the telecom companies provide it - not so great.	therefore the supply is kept on at those properties anyway and therefore no need for a telecommunications plan.	They shouldn't. This isn't a corporate issue, if anything it is a government issue or a personal one.	10 minutes.
			If that isn't comprehensive enought, what about using Neighbourhood Watch or similar and	Some people also make choices that put them in vulnerable situations and need to be responsible for that choice. ie extremely rural living. Living without power or telecommunications.	
5		The approach assumes that access to a mobile phone guarantees the ability to call 111 services. As a rural dweller, this not the case. An event causing a power outage at home can also impact the mobile network, and does at present. Further a mobile phone can only be used to access 111 or other service while it is charged. The state of charge will vary from 100% to 0% in an emergency. Unlike a battery powered network connection backup, a mobile phone is not always on charge. In the event of an extended medical emergency, as we have experienced twice in 2 years, a phone is in use for up to one hours as that is how long it takes for first responders to attend.	Battery backed VOIP services should be required in all rural locations. The backup facility must be able to run for an extended time, bearing in mind distance from other first responders. The facility should also provide a usb socket suitable for at least maintaining charge in a smart phone.	Training and understanding of the capability of systems.	In rural areas, at least 48 hours. Rural power outages can be extended and time must be available for alternative supplies.
6		It is already the case that most people with copper landlines cannot place calls during a power outage. The only people who sould be 'given' anything are those who meet the following criteria: 1) They do not have mobile phone or it does not work at their place of residence. 2) They have an existing copper connection and a phone powered by the copper network. 3) The decision to cease copper services is due to discontinuation of the copper network, not individial providers desire to move customers to more profitable platforms. Under no circumstances should providers be funding phones for anyone else, irrespective of their personal circumstances.	Education. There is no point giving people mobile phones which can make emergency calls only. It is almost 100% certain they won't be charged and ready to use when the power goes out.	Nothing. I object to phones being provided to anyone which aren't exclusively for emergency calling. If so, I and everyone else who pays for their phones should get a rebate. It's only fair.	Cellular sites - 48 hours minimum.
7	14/09/2019	It is very worthwhile and necessary for people in rural areas especially.	Mandate a standard of how ling copper lines should stay working for following a power cut. In our area the batteries in exchanges are very worn so the copper lines only work for an hour or 2 after a power cut. Phone providers will not willingly renew the batteries as they are not spending anymore money on copper networks.	Cell phones are not an option for most of our area so we would need the copper lines and phone exchanges to be maintained to enable communication in a power cut.	24 hours
8	14/09/2019	Your approach is money and time consuming. You Everyone should have access to call 111 at any time.	Everyone is vulnerable when they have to call 111. You should be penalising the provider for not having thought of it in their device architecture. Both fibre ONT Box and All types of Modem should come with a lithum ion battery bank fitted in them, to keep the phone line active. It will be way cheaper than assessing applications. Therefore chorus should provide a battery bank (\$11) embedded in ONT box and each retailer must provide a (free rental) - battery bank (\$11), a manual phone (\$12) along with their wifi modem. Call me on [], if u have any questions.	Retailers must provide zero rental - wifi modem, battery bank, manual landline phone. Chorus must provide a battery bank for its ONT box. These boxes donot need much power.	Service should on an average work for atleast 24 hours. We donot need wifi, we just need the battery bank to keep the ONT box up and the manual landline. Most retailers provide landline via their modem box (so they should provide a batter for the modem to be kept alive).
9	15/09/2019	Left Blank by Submitter	Left Blank by Submitter	Retailers have to make your property fibre ready. If copper is to go they have to replace it with fibre regardless if you are currently live. Chorus refuses to have your property enabled with fibre connection unless you are signed up with someone.	A week

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10			Community networking	A UPS?	2 hours
11		Relying on mobiles is not ideal because as you say not everyone has a mobile and not everyone want the expense of having a mobile. We should get back to the trusty landline not the battery operated portable but the proper landline that always worked during a power cut.		A landline phone. When the government owned Telecom we always had access to a phone and the rental was cheap but since privatisation we are now being extorted. If a phone stopped working they would send us a new one.	It should be immediate.
12	17/09/2019	I support the requirement that everyone can make a 111 call in an emergency situation.	Keep copper landlines particularly in rural areas where cell coverage is notoriously unreliable.	Retailers could stop bullying customers to get rid of their landlines. I had to explain to the call center person from Vodafone what RURAL means. I simply cannot rely on a cellphone in rural Northland. I can think of several instances where accidents have occurred and someone has had to go to a house to call 111 because they couldn't call 111 from cell phone, and thats with No power outage.	In 2007 there was a major storm event that affected the upper north island from Auckland. My home had no power for 8 days. We had a landline so communication was easy. Trees had damaged vast areas of the electricity network. Storms throughout NZ cause electricity outages, as do floods, slips and earthquakes. A reasonable time period???? The 111 service should always be accessible, especially in the event of damaging storms where people could be injured.
13	17/09/2019	It's a great idea, especially for people like myself who live where thereis no reception, I rely on wifi calling.	Emergency phone booths in low reception areas.	Battery back-up	No more that 8 hours
14	17/09/2019	You make the assumption in your diagram that someone with a copper connection has access to 111 in a power cut - incorrect. Most people now have cordless handsets which require external power for the base station to operate. Base stations that can operate on battery for a period of time are available but not standard.	Battery backup seems to be the answer to everything - surely a mobile phone is the answer (except where mobile access is not available - then what?), mobile providers should offer a prepay option that does not expire and can be held for emergencies.	see above	What service? 3 days
15	17/09/2019	I think this is an excellent idea. I have genuinely considered this an issue even though I have reasonable means to contact 111 during a power cut.	Having increased cooperation between emergency services and vulnerable civilians during power cuts - even having police patrols to help allay concerns of ie the elderly.	If a power company is scheduling a power outage they should take reasonable steps to ensure those affected are safe. Maybe having someone in the company who looks over those who don't have access to amenities during the time they have no power.	12 hours.
		Not bad but not sure that providers should have to pay for the battery backup. Shouldn't that be a personal purchase. Could the personal alarm be another option	Personal alarm	I dont believe its retailers responsibility	Not entirely sure what you mean by this question. Shouldn't a service be able to work for the longest period it can as you are not going to know how long power is out for and you could need 111 at any time. Also shouldn't families shoulder responsibility for checking on family members that are vulnerable
17	19/09/2019	Flawed completely from your first statement FIBRE REQUIRES ELECTRICITY! FACT: You will not in a normal power outage let alone a disaster to be able to guarantee loss of innocent life from lack of communications because like my great Uncle at 91 currently is experiencing his phone on fibre was knocked out for 3 days over the weekend. I could not contact him, and could not get a response from Telecomunder the privacy act, and the call to a neighbouring business whom is my support whistfor him whilst I was in hospital said why he was unable to use his phone. Thankfully rectified today my Uncle told me that due to massive rain pours in [with one push Panic or Help SOS button to alert 111, and up to 10 family members or friends with a HELP text message and full GPS co-ordinates.	Who are the retailers you refer to in this question? Electricty and Telecommunications companies? Vunerable Consumers usually need a Support person so thats the first thing the Retailer should ask the customerWhom in a life emergency is your first person to contact? Then tell them both the information they need to know ie "If you buy this wonderful Home/Fibre/phone/lifeline/TV/Security you can do all the wonderful things in the world and even make your coffeeoh but in an Emergency or Power cut well see the small print Clause DOA29 paragraph 3, lines 4 -1001". Sorry you may die because the old reliable system we had of copper wire that could still work in a disaster, someone thought it nice to get rid of it! And the name/group of people and their sponsors that signed off on this flawed plane are: Their personal names and registered home address for all service of legal documents or place to send the law suit for manslauhter is: (This is what I would expect to see FACT and to the Blunt Point!)	1 hour for essential life services that is they are unable to be transported to hospital due unavailability of Ambulance or transport services that have life care support onboard eg Fire appliances, flying doctors, helicopters, maybe drone stretcher ambulances by this time. There are terminal patients or long term ill patients being cared at home that in a disaster, power outage or other events that you will not be able to rely on Emergency Services or the triaging of emergencies. 12 hours essential gridsyou may have people trapped in elevators etc unable to call for help. 24 hours food is spoiling and other Medical emergencies may be happening but Mobile Phone Trailers of which worked in Cellphone coverage areas,,,,but remember Cellphone coverage is not everywhere in the 21st Centuryand Satellite phones may be the only reliable source in clear weather. SPOT Satellite Hunter/Tramper SOS type devices in my personal experience are the most reliable anywhere around the worldexcept Bermuda Triangle.
18	19/09/2019	What I read online on your facebook page seemed ok, but I have concerns. Our home is rural, on a main road, and the main road has cell coverage. Our home does not. The maps for the major companies all say we have coverage, however this is simply not the case - we may sometimes get some coverage, but it is patchy at best, and bad enough that people need to call our landline as our cell phones don't work, even well enough to get a text reliably. And we don't even try to call out from here. We have a young son who has life threatening allergies and need to always be able to call an ambulance. Our concerns are that companies who are asked to cover the costs for us to have reliable 111 service will try to force us to cover those costs, citing their maps which say we should have coverage. Is there a way to make sure that those of us in so called coverage areas have got coverage during a power cut? We don't have fibre out here, and have no knowledge of it being planned, so rely on our landline, as VOIP technology on our current broadband connection is poor enough to be all but unusable. We gave up on that and went back to a landline.		Retailers should be required to provide vulnerable consumers with a guaranteed communication means, be that a battery back up, satellite phone, or whatever else is appropriate in the situation.	A service should work until power is restored - having no means of communication is unacceptable if an ambulance is required, no matter how long that is for. Obviously in a civil defence emergency, services will struggle and there may be breaks, but for a simple power cut there is never a time when it is ok for us not to have coverage.
19	19/09/2019	We definitely need it.	I am unsure of what there is for us.	A certain and sure way of being able to contact emergency services as required.	As long as the power is down.

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20	19/09/2019		Ideally, there should be a free land-line rental option provided by at least one phone service provider, so there is only a charge for calls rather than the service itself. That would realistically enable people to have a land-line phone but not use it unless there was an emergency. Also, if there is technology to be very precise about where a cell phone user is calling from, it should be used so that call length could be reduced for people who may have forgotten to charge their phone, or who need to assist with the emergency until help arrives. If we can get to the point where someone can call and simply say " I need the police", that might be good.	The ability to make 111 calls should not depend on whether a customer owes money to the phone service provider. Ideally, one should be able to make a 111 call without having a sim card in the phone.	Analyse data about the lengths of power cuts. Set a standard, such as being able to use an alternative service in, say 95 percent of power cuts.
21		While i like the approach, are you confident that it will reach all New Zealanders? Is there a test number that can be used eg 115 that can check access to the 111 network?	unsure. Encourage people to get to know their neighbours	there are very few consumers without access to the mobile network. I think that a mobile phone should be a part of everyone's emergency kit	the ideal is that there is no down-time, however that is not always practical. keep the outage as short as possible. failing that, a way of contacting emergency services should be available for the duration of the outage
22			Make sure telecomms providers contact people by snail mail to give them instructions. Make it mandatory. Set up a system to inform the helpers first rather than those being helped. This includes Radio New Zealand. Radios work on batteries and some are wind-up. Make more public service broadcasts. Interrupt a programme if necessary. Get people to protect themselves by treating it as part of their "get through" plan. It would then qualify for tv and radio advertising budget. Possibly. Talk to people who have regularly suffered power outtages, regardless of the reason and whether or not copper wires play a part in communications. What action have they taken? Give people practical options rather than talk to them about policy decisions. E.g. tell them that they can access battery-driven phone chargers and or charged mobile phones at their council office (assuming that they can reach that office). This may be a library. Make sure you put this information in writing with explicit instructions on where to store that information, as the council office will not be getting a phone call on the day! Use existing networks such as neighbourhood watch or social services or Age Concern etc. Find out who has a personal alarm on their person. Tell people who will contact them and by what means.	Information - see above. Spark is closing physical shops in small towns so I'm not sure what you mean by retailers. There are no custodians in a private market, just businesses that will comply if forced to; and only then if you have teeth to do it.	What service? It depends on the expected down time and power companies are unable to answer without investigating the outtage. In my experience (when using copper wire), it may take more than a week to restore an internet connection following restoration of the power supply. The service provider will blame the customer for this, citing the modem as cause. Many mobile phone batteries may be used up in calls to that provider. (When that phone service is withdrawn, people will hear a recorded message telling them how to report their loss of wi-fi online). The only way to get the service back is to agree to pay a call-out charge. If a person is using a wi-fi phone and is also on the 'vulnerable' list, they should expect a quicker response than one week. If a call-out charge is applied (which they must expect, given that there is no hard wire outside of the property to investigate), they should be given extra time to pay it. Whilst this is going on, they should have access to the same protection system you develop. If a generator is temporarily employed, disconnected then subsequently replaced with another, the lack of phone service may continue on and off for weeks. Any system of protection should be prepared for that.
23		a major outage. I think the approach is proactive and it gets people thinking but I only saw a post on FB by chance. A nationwide campaign should of been looked at or considered.	Knowing your neighbours and looking out for each other would be sensible. After the Kaikoura earthquake our block of flats automatically met outside and checked to see if everyone was okay. We did have a major power outage as a transformer blew in the earthquake. You realise how isolated you are when you do have a powercut Another option would be to have all civil defence centre supplied with an old school phone that is not reliant on power or cb radio. I'm not sure if there is a way that is not reliant on phone lines but somehow works like an emergency locator beacon to alert neighbour etc that help is required. Was thinking along the lines of St John emergency alarm but without using a phone. Public knowledge campaign to raise awareness including using a good old address book of contacts and if a person does have a mobile to consider having a charged battery pack. This could be completed via lines companies such as we have had in the past with planned 6 hour maintenance	Knowledge and advise on other ways to make contact in an emergency. Possibly providing emergency mobiles for customers who meet the criteria.	This is dependent on what has caused the powercut. Obviously if it was a major natural disaster it would be hard to quantify but it would not be unreasonable at other times to allow 6 - 12 hours as this would factor in people being out of touch at night etc
24		I think it is important that emergency services are able to be contacted in the event of a power cut. But what would a battery back up solution look like? It would need to still have cell coverage of some sort, which living 10 min from a town and 30 min from Christchurch, cell coverage is patchy at best. Cell networks need more investment for better coverage (which would give also benefits of better RBI Broadband). Where I am we can not get a copper line, and they will not look at rectifying that situation	outages. Central stored list, distributed to Civil Defense/Some sort of response services.	Perhaps some sort of emergency call button linked to the cell network with gps location sent on pressing (requires cell network to be robust)	Standard power cut, 24 hours, severe weather event 3 days, Earthquake/Alpine Fault event, 7 days or longer if possible.
25	1/10/2019	Great. Been worrying about it.	Radio?	Not sure	30 minutes is max we can do here, having a vulnerable person living on the
		what approach	trained staff would help for example I have a brain injured mute autistic son and during the earthquakes there was no support from any one no one could cope with us they did cry but I am very able, if some ones rings with a problem will they be understood	retailers will refused to serve them if they are made to help should be an old fashsion telephone insides mall	premises. 30 mins
		an excellent idea. This has been overlooked by the telecommunications sector. Also consideration should be given to medical alarms.		during a power cut any consumer would be vulnerable. All consumers should be provided with backup. The copper wire system functioned reasonable well during power outages.	
28	8/10/2019	Nothing, its not your business to do that.	Tell them they don't have access to the 111 service and leave it to be their responsibility, which it is.	Nothing, it's not your business to force anyone to do anything. You might encourage wISPs to sell some UPS system to clients with no cellular coverage.	Whatever the customer says. They could buy the 1hour unit, or the ten hour unit.

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	Received	a power cut?		call 111 in a power cut?	work for?
29	9/10/201	9 Im worried by the thought that a ISP is responsible for providing a UPS to the consumer.	Secondary radio system that can take the calls for rural communities.	Nothing but information.	Depends on reason.
		I would support regulations to require all ISP's to be forthcoming that the 111 coverage isn't guaranteed and that a UPS is available for the client at a cost (this unit should be sold to the	Emergency police boxes (Dr who style) that are on the side of the road, only connect to 111 and are copper connected, this will assist in high fibre low copper areas, without forcing costs upon		24 hours ideally, but if its a huge natural disaster the time frame is longer than that of a car crashing into a poll etc.
		customer at the exact cost it is to the ISP's).	consumers or businesses.		
		While a UPS is easy to set up, the line provider (Chorus, UFF, Enable, North Power etc) should train their techs to set them up for clients when they install the ONT on site.	Boxes per street would be based upon street size (queen Street would need more than a side road)		
		Same goes for providing mobile phones, in areas where that is a viable option (coverage is adiquite) the ISP shouldn't have to bear the cost, a cheap \$20 Mobile phone with a SIM is all you need, keep it in the emergency kit and charged.			
		I don't support forcing businesses to face extra costs (that they Will pass onto consumers) where there are other options.			
30	11/10/201	9 It makes sense	Ensure they are capable of UNDERSTANDING how their additional contact systems work - a lot of	Battery backup to existing mobile phones, and the easy means to keep them	8 hours if the power cut is particularly long
	11/10/22		older people aren't intuitive with technology	charged while not in use	
31	11/10/201	It is a great idea, however, we have the following points to make.	Understand the differing aspects of the needs of rural communities.	Retailers should provide easy-to-use phones and systems for those who for	Provision of alternatives to rural areas where there is no mobile coverage and
		The mobile network does not cover most of New Zealand. It only covers 50 per cent		physical reasons can't use smartphones or phones with small numbers. The needs of the disability sector need to be considered.	the area is experiencing a power cut, should last until the power is back on. The same applies if there is mobile coverage.
		geographically and our farming community probably lives in that 50 per cent.		and the second s	
				Retailers might need to provide satellite connections in a power cut if landline	Happy to discuss this submission further.
		The Code needs to cover the 50% with no coverage, not just in a power cut as emergencies		also compromised.	
		regularly occur on farms, rural roads, etc.			
		Power cuts in rural New Zealand are common and caused by differing situations which could also lend the landline network deficient.			
		If there is no mobile coverage, there needs to be a real effort to ensure landline access is			
		consistently available in these communities.			
		Battery power supply for mobiles is great where there is mobile coverage.			
		The code should provide for anyone to be able to make emergency calls, wherever they are.			
32	12/10/201	19 It's great you have taken these steps, as a firefighter we see this often, where people are running	There is a gap in your messaging, you say if you have a cordless phone, have a corded phone, but	They should be providing a stand alone UPS to run the NTU and the Route only,	This should be a sliding scale in distance from a city. Metro areas would seldom
	12, 10, 201	to the neighbours house to call.	with the removal of the copper phone network, fibre needs power at the house end to stay up. So even having a corded phone you are offline.	they should be also monitoring the battery performance over time online, because these things don't last forever, and they are very easy to forget.	have an outage more than 1hr, however rural areas could have days. You're not going to get a UPS to last for days, so they need to have a plan to get in touch with those people, much the same way the reliance on electricity changes in the
			Service providers should be given one option to supply power to the network termination unit NTU and the ISP's router, which is where the SIP voice translation is done.		energy act have done so.
			I'd imagine the hard part here is that one is owned by Chorus (NTU) and the other by the ISP.		