

Draft Copper Withdrawal Code (CWC) – DPA Submission, July 2020

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Introducing Disabled Persons Assembly NZ

The Disabled Persons Assembly NZ (DPA) is a pan-disability disabled person's organisation that works to realise an equitable society, where all disabled people (of all impairment types and including women, Māori, Pasifika, young people) are able to direct their own lives. DPA works to improve social indicators for disabled people and for disabled people to be recognised as valued members of society. DPA and its members work with the wider disability community, other DPOs, government agencies, service providers, international disability organisations, and the public by:

- telling our stories and identifying systemic barriers
- developing and advocating for solutions

The Submission

DPA is pleased that the withdrawal of copper services is to be regulated under a code.

Many disabled people are heavily reliant on landline telephones as they are less likely to have smart phones than non-disabled people due to issues of affordability and usability. Therefore, withdrawal of landline services may have a disproportionate negative effect on disabled people compared to non-disabled people.

We are also pleased that the code prevents copper being withdrawn unless an equivalent fibre service is available in any area, and pleased that Chorus cannot charge the end user for having fibre installed.

While we welcome the scheduled mandatory notices set out in the Draft CWC, we are concerned that some disabled people may not be able to either access hard copy letters or fully understand them. We feel that before any landline service is withdrawn that a representative of Chorus makes at least two attempts to talk to a resident or home owner where withdrawal of the copper service is planned.

DPA is also pleased that the Draft CWC mandates Chorus, in all withdrawal notices, to notify residents and home owners of the 111 Contact Code, so they are aware of

what help might be available to them to ensure that they can call 111 during a power cut (DPA has provided a submission on the 111 Contact Code).

New Zealand's obligations under the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)

The Articles of the UNCRPD that are most pertinent to the 111 Contact Code are:

- Article 4.3: Involving disabled people and our organisations;
- Article 9: Accessibility;
- Article 19: Living independently and being included in the community;

Recommendation

DPA recommends that the Draft CWC is strengthened to include that on at least two occasions during the withdrawal notice period, a Chorus representative is required to talk to a resident/home owner to ensure that they are aware of the copper service withdrawal and assist with understanding of the consequences and options.