

17 July 2020

Commerce Commission
Via submission link

Dear team

Re: Draft Commission 111 Contact Code

Rural Women New Zealand has pleasure in providing a submission on the Commission 111 contact code. We are pleased that rural communities are being provided with resources to contact the 111 emergency services in the event of power failure to ensure that all New Zealanders are able to have equal access to healthcare amenities.

Introduction

1. Rural Women New Zealand is committed to supporting and strengthening rural communities through the empowerment of rural women and children and we are submitting our opinion on the Commission 111 contact draft code to seek changes that will ensure equity for every New Zealander, including people who live in rural areas.
2. Although we appreciate the recognition of an issue that has gone unnoticed and the promising future that the draft code entails, we have some concerns we would like to address.

General Comments

3. RWNZ agrees in principle with the general direction of the draft code, however, we make the following observations and recommendations.
4. RWNZ believes that the title “vulnerable customers” does not properly represent the individuals that the draft code is targeting, and instead promotes a false narrative that individuals with disabilities or any disadvantages cannot live productive lives, and must be deemed “vulnerable”. The semantic connotation of the word is not supported by RWNZ and instead, we promote defining customers as individuals with compromised connections or as citizens with restricted access to emergency services.
5. RWNZ agrees that telecommunication companies are responsible for notifying and informing their customers of the possibility that fibre and fixed wireless services might not work during a power outage and that we would expect these companies to provide a suitable service under these circumstances at no cost to the consumer.

Specific Comments

6. RWNZ suggests that the Commission should establish some well-defined and specific criteria for those who are considered “vulnerable”, and impels the inclusion of New Zealanders living in rural areas. Due to the remoteness and intermittent network, access to healthcare amenities are becoming difficult in rural areas, and it is pivotal for these individuals to be provided with equal services as any other citizen.
7. RWNZ further suggests that the Commission should establish some well-defined and specific criteria for those who are considered “vulnerable”, and impels the inclusion of New Zealanders living in rural areas. Due to the remoteness and intermittent network, access to healthcare amenities are becoming difficult in rural areas, and it is pivotal for these individuals to be provided with equal services as any other citizen. Some members recommend creating a more comprehensive guide to ensure that elderly and individuals who are not able to understand the complexity of diverse networks are informed properly about what is best for them.
8. RWNZ supports the criteria described for the “person of standing” and believes that it is extensive and comprehensive. Although one member asks, “what qualifies these people to make a decision on someone’s suitability”, and further enunciates that a pilot being included in the list instead of a farmer who actually understands the connectivity issues faced by rural people is inapt.
9. RWNZ is concerned about what other means or resources of communication customers are expected to be provided with by telecommunication companies, if their service does not work during a power cut. We urge the Commission to ensure the solutions offered actually address this issue and appreciate the recommendation for service companies to provide these resources with no charge to the customers.
10. RWNZ reinforces and supports the recertification idea that providers should contact their customers once a year or if they move to confirm that the solution provided is suitable and still working efficiently.
11. RWNZ agrees that telecommunication companies are responsible for notifying and informing their customers of the possibility that fibre and fixed wireless services might not work during a power outage. However, some members question how the cost of these services are going to present as more resources are being provided.
12. RWNZ is concerned about what other means or resources of communication customers are expected to be provided with by telecommunication companies if their service does not work during a power cut. We urge the Commission to work on a solution that addresses this issue. However, RWNZ appreciates the recommendation for service companies to provide these resources with no charge to the customers.
13. RWNZ reinforces and supports the recertification idea that providers should contact their customers once a year or if they move to confirm that the solution provided is suitable and still working efficiently.
14. RWNZ members have not had any experiences dialling 111 that would cause them any concern about shifting the responsibility of ensuring the number is accessible from the government to the private sector. However, some members urge the Commission to ensure that this transition is seamless and that all patients, no matter who is responsible for their healthcare, are being provided with the same assistance.

15. RWNZ seeks assurance that this code will not adversely affect the rural Wireless Internet Service Providers who are currently filling the gap of internet services in rural New Zealand. There are many nation-wide WISPs who do not have the economics of scale that the large telecommunications providers have. We do hope that this code does not adversely affect the WISPs to the point of business failure.

About RWNZ

16. Rural Women New Zealand (RWNZ) is a not-for-profit, member-based organisation that reaches into all rural communities and has an authoritative voice on rural environment, health, education, technology, business and social issues.
17. RWNZ strives to ensure that all rural residents, workers and families have equitable access to services, inequalities are addressed by Government, and the wellbeing of rural communities is considered from the beginning of all policy and legislative development.
18. RWNZ is affiliated to the Associated Country Women of the World and as such upholds all United Nations, ILO, FAO and WHO conventions and outcome statements as they relate to women and rural women in particular.
19. RWNZ would like to draw particular attention to the United Nations Sustainable Development Goals (SDGs) in particular SDG3, Good Health and Well-Being, which ensures good quality of life and well-being for all ages, as well as GSDG10, Reduced Inequality, that promotes resolving discrepancies within and between groups of people.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Angela McLeod', with a long horizontal flourish extending to the right.

Angela McLeod
Manager, Government, Public Sector and Academic Relationships
Rural Women New Zealand