

9th August 2022

By email: Julian Kersey

Dear Julian

Proposal to amend the framework and methodology for determining specified fibre areas

Thank you for your letter of 13th April 2022 requesting that we amend the framework and methodology for determining specified fibre areas (SFA).¹ We also appreciate the time your team has taken to provide additional information and context during discussions with the Commission's team.

We have considered your proposals and have decided to maintain the current framework.

In our view, the granularity of detail currently provided in the annual SFA assessment dataset is needed to meet our statutory task of determining where fibre is available to end-users (under section 69AB of the Telecommunications Act)². Reducing the level of detail would impact our ability to deliver on our statutory task and could increase the level of uncertainty for end-users.

Additionally, we note the request to extend sign-off authority for the annual provision of data to the Commission to a delegate of the Chief Technology Officer. We confirm that we consider that sign-off from a named and operationally responsible Chorus representative other than the Chief Technology Officer is sufficient for the intended purpose of certification. On this basis we do not see a need to change the existing framework.

Lastly, we would like to explore potential opportunities to streamline the SFA assessment process at an operational level without amending the framework in collaboration with the Chorus team. We will raise this with you for discussion during this year's annual assessment process.

Yours sincerely

Rachael Coyle
Head of Telecommunications

¹ The framework document is available on the Commission website here:
https://comcom.govt.nz/__data/assets/pdf_file/0025/185254/Determining-specified-fibre-areas-Framework-and-initial-approach-31-October-2019.PDF

² The Telecommunications Act 2001 is available on the NZ Government website here:
<https://www.legislation.govt.nz/act/public/2001/0103/latest/DLM124961.html>