

ENABLE NETWORKS LIMITED

SUBMISSION IN RESPONSE TO THE COMMERCE COMMISSION EMERGING VIEWS PAPER ON IMPROVING RETAIL SERVICE QUALITY: PRODUCT DISCLOSURE

7 December 2022

Submission

- 1. This submission is made by Enable Networks Limited (**Enable**) in response to the Commerce Commission's (**Commission**) emerging views paper, "Improving Retail Service Quality: Product Disclosure" issued on 12 October 2022 (**RSQ Paper**).
- 2. Enable agrees with the Commission that to improve retail service quality and competition in the broadband and mobile markets, consumers must be able to make better comparisons between retail plans and providers. We are of the view that if the Commission addresses the six key aspects identified in the RSQ Paper in an effective way, then this greatly improves the transparency of retail offers to enable consumers to make appropriate comparisons so they can decide what is best for them.
- 3. To ensure consumers are able to make better and more informed decisions, it is important for <u>all</u> broadband and mobile offers on the market to be comparable in easy-to-understand language. The principles retailers must abide by must be clear with reasonable incentives for compliance, and the method of addressing these product disclosure matters must be as wide reaching as possible. If only certain retailers are bound by a code or if a code is ineffective in achieving the Commission's objectives, then competition will not be at its optimum and consumers will remain confused.
- 4. We thank the Commission for the opportunity to provide feedback on the RSQ Paper and would be happy to discuss our comments in more detail.