



10 July 2020

Commerce Commission

WELLINGTON

Wellington Chambers
Level 6, 154 Featherston St
P O Box 715, Wellington
6140
New Zealand

Commission 111 Contact Code Consultation

Federated Farmers of New Zealand appreciates the opportunity to provide feedback on the Commerce Commission's *111 Contact Code* draft decisions and reasons paper.

The provision of telecommunications services in rural areas is a matter of particular concern to the Federation and its farmer members. Our interest in these issues stems largely from the perspective of working towards increasing the availability of rural telecommunications services, improving the quality of those services, and supporting efforts that enable better use of such services to support farm production and the farm business.

We have considered the 111 Contact Code developed by the Commerce Commission and understand its genesis as 2018 amendments to the Telecommunications Act 2001 regarding the deregulation of copper services where fibre has both been rolled out and is available to consumers in those areas.

Fibre remains outside the reach of most rural consumers for two key reasons. Firstly, the government is expressly pursuing a preference in its Rural Broadband Initiative and similar investment programmes for wireless and mobile technologies over that of fibre to the farm. Secondly, despite 2018 amendments to the Telecommunications Act 2001 enabling the rollout of fibre along existing powerlines, there remains little to no interest for this to happen in rural areas by electricity distribution businesses.

The issue of ensuring consumer access to the 111 service where the copper-line network is effectively decommissioned in favour of replacement fibre networks is not one of particular relevance to rural New Zealand. As such, we have no substantive feedback to provide on the 111 Contact Code itself.

That said, we thought it worthwhile to bring to the Commission's attention the experience of many of our farmer members of an unreliable 111 service. This is largely a product of some parts of the rural telecommunications network delivering unreliable copper-line services and poor mobile coverage. The end result is that a significant proportion of rural crimes go unreported to NZ Police.

We are concerned that the national aggregation of performance statistics under the TSO deeds with Chorus and Spark risk averaging away the often-dire experiences of rural New Zealanders. A shift from national aggregation to regional or district aggregation of performance statistics would go some way towards more clearly revealing where problems exist in the provision of essential telecommunications services.

Yours sincerely,

Andrew Hoggard

National President and telecommunications spokesperson