



**13 October 2021**

**Tristan Gilbertson**  
Telecommunications Commissioner  
Parliament Buildings  
Wellington 6160  
New Zealand

Dear Tristan,

Re: Furthering our discussions regard Commerce Commission Response to  
**A UNIQUE SOLUTION TO A PREVALENT CHRONIC CHALLENGE**

We note with interest that the Telecommunications Act has now mandated that the Commerce Commission regularly monitor Telecommunications Retail Service Quality (RSQ).

We contacted you about this subject mid 2020 because we believe we have a set of unique offerings that can assist you in this regard.

Shoulder Monkeys is made up of 3 IT professionals who have worked at the highest levels of management in Telecommunications for the past 20 years in New Zealand and across the world.

We know that RSQ has two major pain points for customers validated by your own survey data:

1. An issue with Internet service performance (31%) or availability (18%)
2. An issue with Customer Service (internet 13%, Mobile 9%)

It is very difficult for a customer to resolve an internet related performance problem because customers do not have any reporting that can show the problems they are experiencing. If the service has failed completely then this can be identified and rectified by the telco, however intermittent issues are very difficult to resolve and are often the cause of substantial customer frustration.

The second challenge as a customer is that if you do have a service performance or availability issue, the customer service provided by your telco is often poor. Trying to get through to the telco can involve long wait times, hand offs and lack of resolution. Telcos do not have the capability to look into the past in enough detail to see what was happening at the time of the failure, only what is happening at the time of the call. This is a fundamental problem preventing telcos from fixing performance and availability issues.

Modern technology can enable the Commerce Commission to monitor RSQ simply and cost effectively for both Internet performance and customer service:

- Internet (and mobile) service performance and availability can be solved through our solution providing *end user customer experience* to measure actual received service and provide measure/compare/complain/swap capability to the end user while providing monitoring data to the commerce commission. This is a SaaS (*software as a service*) tool which has both a smart phone mobile application and a central component. Easy to install, low maintenance to run and it also helps the telco by providing historical data that has been proven in trials to help them identify the root cause of problems. It's a win-win-win solution for customers, telcos and the Commerce Commission.
- Customer Service RSQ monitoring can be achieved using our language based AI technology to achieve *conversation insight*. This is a SaaS (*software as a service*) solution which analyses conversations between Customers and Telcos (chat or transcribed voice into text). It will allow the commerce commission directly (or through a third party service engaged by the Commerce Commission) to identify why customers are calling and the top problems being experienced by Customers of each Telco including the underlying complaints. Additional augmented intelligence SaaS tools can further analyse and compare the data from market reference data to add further quality and insight into the RSQ monitoring service that even the might of Google and AWS cannot match.

We believe that only this kind of action will drive a fundamental customer-first response from our service providers to provide what are increasingly critical services.

Our solution will allow the Commerce Commission to use its funding effectively and to better measure and address issues as a partner to end users.

We would like to sit down with you in confidence and discuss this further.

This letter and all our previous correspondence (not repeated here) in addition to being a request for direct dialogue is also Shoulder Monkey's formal solution orientated Submission to the Media Release no. 182 Issued 14 September 2021 "Commission seeks views on improving telecoms retail service quality".

Sincerely



Joe, David and Duncan

**SHOULDER MONKEYS**

Joe Milich, David Moss, & Duncan Millar

Copy Ben Oakley -Manager Telecommunications, Commerce Commission, PO Box 2351, Wellington 6140

