



**FEDERATED
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OF NEW ZEALAND

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Commerce Commission

Improving Retail Service Quality: Product Disclosure

Federated Farmers of New Zealand appreciates the opportunity to provide feedback on the Commerce Commission's *Improving Retail Quality Service: Product Disclosure* emerging views 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 this area is primarily focussed on increasing the availability of rural telecommunications services, improving the quality of those services, and encouraging efforts that enable better use of such services to support the farm business and rural household.

Federated Farmers supports the Commission's proposals to improve retail service quality in the telecommunications sector.

In particular, we support the introduction of proposals to improve transparency in provider pricing and costs to the consumer over time along the lines described in the emerging views paper. There are a great many providers of broadband services into rural areas, each offering plans with different download speeds and monthly download caps. While there may only be one or two providers accessible by any one rural consumer, proposed measures should better enable rural consumers to make more informed decisions on their provider of choice.

Further, we support the introduction of proposals that would lead towards an integrated coverage map for mobile services. It is not uncommon for rural consumers to be informed through online mapping systems that their property does have coverage, only for that to be disproven by real world experiences.

Additionally, we recommend that these proposals take the matter further by also including coverage of fixed wireless services. Both mobile and fixed wireless services tend to be provided on the same towers, and many rural consumers have commented on inaccuracies in online mapping of the coverage of fixed wireless services. Poor experiences through inaccurate online mapping has impacted the willingness of many rural consumers to later re-check whether fixed wireless services have since become available to their property, leaving them to rely instead on sub-optimal internet connections.

Yours sincerely,

Richard McIntyre

National Board member and telecommunications spokesperson