



Fibre PQP2 Change to definition of net reported  
downtime

Submission | Commerce Commission

31 October 2024

## Submission

1. Thank you for the opportunity to provide feedback on the Commission's proposed approach to amending the outage reporting measure for the purposes of the second regulatory period.
2. The Commission proposes to exclude end-user self-reported outages from the measure by amending the definition of net unplanned downtime in the PQ determination. The benefit of the proposed approach is that it retains flexibility for the future and minimises the risk of unintended consequences.
3. We support the Commission's proposed flexible approach. LFC networks are currently showing good reliability and - under current circumstances - it is not unreasonable to exclude self-reported outages given the likely cost and impact of having to integrate these outages in to reporting. Correlating self-reported outages with external reports would also likely be clumsy and unreliable and could lead to reporting issues such as double reporting of outages.
4. However, the reliability of networks can change over time and - should any performance or availability metrics begin trending the wrong way - we'd expect to see self-reported outages making their way in to the measure to provide a more complete picture. Therefore, we support the Commission's proposed flexible approach that preserves an option to adjust the measure in response to changing circumstances without the need to amend the underlying IMs.
5. Further, while a valid approach for Part 6 purpose, the proposed measure won't reflect end - users real world outcomes. The proposed approach, by excluding end-user reported outages from the measure, will almost certainly result in an under-reporting of outages as an outage may not be material for the purposes of network reporting and "fly under the radar".
6. The Commission has also requested outage data from network providers in the context of its market monitoring programme. Commission market monitoring has a different purpose to Part 6 regulation – we understand to enable comparison between different technologies - and we would be concerned if this measure was used for the purposes of market monitoring. The proposed PQ/ID reporting methodology will, as noted above, over-state end-user reliability and does not form a useful basis for comparing alternative access technologies. We would not support the proposed approach if market monitoring was an intended application of the PQ/ID measure.

**END**