

Fibre information disclosure and price-quality regulation

Thank you for the opportunity to provide input into your proposed process and approach for the first regulatory period.

The Internet Service Providers Association of New Zealand (ISPANZ) is the industry body representing internet service providers (ISPs) or, as you call them, 'retail service providers' (RSPs). As such our members sit between the fibre providers which will be subject to information disclosure and price-quality regulation and the end-users that the regulation is intended to protect and benefit.

We commend the body of work that has resulted in the proposed process and approach, and wish to engage constructively for the ultimate benefit of end-users.

Due to history, the terms and conditions under which our members access fibre services from the regulated providers vary from provider to provider. For example, and very commendably, Chorus' requirement for performance bonds has not been adopted by other regulated providers. This is not a price-quality issue, but it is a significant (and we believe unnecessary) cost of doing business with Chorus. It is an obstacle to our members as they try to provide competitive solutions to their customers – the end-users that regulation is there to protect.

As a general rule, ISPANZ members are in favour of as uniform as possible a regulatory framework, one which will drive more standardised and rational behaviour across the regulated providers.

Our initial specific comments on the consultation document are detailed below:

- (2.11) We agree that the ID and PQ processes should be run in tandem.
- (2.13) The proposed key phases and milestones appear reasonable.
- (4.11) We agree with the proposed approach to determining ID requirements.
- (4.42) The suggested areas for ID requirements appear appropriate.
- (4.34) We strongly agree that balance dates should be aligned.
- (2.26) (5.193) We strongly agree that a technical workshop on quality of service standards should occur early in the process. ISPANZ members will wish to be involved in this technical workshop.
- (6.31 – 6.43) We note your discussion on geographical areas where Chorus supplies FFLAS in another LFC's UFB area and will watch discussion on this subject with interest.

Thank you again for the opportunity to comment on your proposed process and approach for the first regulatory period.

Best Regards,

David Haynes

Chief Executive

14th October 2020