

Quality ID working group session – 17 March 2022

Summary of discussion

Purpose of this paper

1. This document summaries the main points discussed at the quality information disclosure (ID) working group session (**session**), held on 17 March between the Commerce Commission (**Commission**) and regulated providers of fibre fixed line access services (**FFLAS**) (**regulated providers**).
2. The regulated providers are Chorus Limited (**Chorus**), Tuatahi First Fibre Limited (**Tuatahi**), Enable Networks Limited (**Enable**) and Northpower Fibre Limited (**Northpower**).

Session purpose

3. The purpose of the session was to provide clarification on issues regulated providers have found in implementing the decisions on quality ID in the Commission's final ID determination, to help them to complete the required disclosures.
4. The PowerPoint presentation referred to during the session is available on the Commission website.¹

Discussion points from the session

Reporting

5. Northpower asked if the third transition quality ID report is due at the end of September 2022, citing the due date in slide 8. Commission staff said that the report is due one month after the quarter has ended, and for Northpower this would be the end of October 2022. We have corrected this error in the published slides.
6. Commission staff confirmed that the third transition quality ID report for Q3 2022 is due on 31 October 2022 for all regulated providers.

Transition period reporting (1 January to 30 September 2022)

T1 Connections completed within agreed time

7. Commission staff confirmed that the agreed provisioning date is the last date agreed between the end-user and the regulated provider.
8. Chorus asked how third-party delays and health and safety issues should be treated. Chorus said that there are cases where access can be restricted, or the site is unsafe. Chorus' process is to renegotiate the agreed date/time with the end-user in these cases.

¹ Commerce Commission "Fibre Quality ID working group session – 17 March 2022", (8 April 2022).

9. Commission staff said that regulated providers should plan for these issues where possible but that renegotiating the agreed date/time with customers is a good approach and should not be treated as a missed appointment. The agreed provisioning date is the last date agreed between the end-user and the regulated provider, which allows for a change to be agreed with customer.

T2 Median time to provision

10. Commission staff talked through the examples of simple and complex, and layer 1 and layer 2 connections on slide 11.
11. Commission staff clarified that the layer 1 and layer 2 split is based on service provided and intact connections are considered Layer 2 simple new connections.
12. Chorus said that the split between layer 1 and layer 2 in the ID requirements is not quite the same as in its reporting for Crown Infrastructure Partners (**CIP**). For CIP reporting all services were counted under layer 1 provisioning, as all services require a fibre path and only bitstream services were counted under layer 2. Chorus said that it understands the change with ID requirements and will align to ID reporting i.e. the categorisation will be based on the service provided to the customer.
13. Tuatahi said that it only measures connection time for layer 1 as commissioning layer 2 components are generally fast to implement.
14. Tuatahi asked if PONFAS is layer 1. Commission staff clarified that it is layer 1.
15. Enable asked about multi-dwelling units that have not been prewired. Commission staff clarified that this would be a complex installation.
16. Regulated providers were comfortable with the Commission staff's examples and clarification.
17. Regulated providers noted this measure should be expressed in days instead of hours. Commission staff said they would confirm if the measure was in days. We have said in the issues register published on 31 March 2022 that we propose amending the ID Determination to clarify that the median time to provision can be reported in working days rather than hours.

T3 Average downtime

18. Commission staff clarified that this measure does not include non-provider faults but does include cable cuts.
19. Commission staff explained that this is because regulated providers can take steps to mitigate cable cuts. Examples of mitigating factors are the depth and position of cables.
20. Commission staff asked how regulated providers currently treat cable cuts. Chorus said that it includes them in unplanned downtime. Enable said that it does not include them as a fault where the cable is buried to the correct depth.

21. Enable asked whether cable cuts on access seeker property would also count towards this measure. Commission staff clarified that they would.
22. Commission staff also clarified that Optical Network Terminal (**ONT**) faults are not included for the transition period.
23. Chorus said ONT faults were not included in current CIP and RSP reporting as it could not tell if there was a fault with the ONT or the downtime was caused by customers turning off the power. Chorus said that, in the future with additional reporting development, it could differentiate between ONT faults caused by the customer turning off power and genuine ONT faults.
24. Commission staff indicated that this would be helpful and if such development was done, a customer powering the ONT down would not be considered a regulated provider fault.

T5-T6 Performance

25. Tuatahi asked Commission staff to explain the phrase “as per the Regulated Fibre Services Operations Manual” in slide 10 for T5 and T6. Commission staff clarified that this refers to Chorus’ Bitstream Operations Manual but that the overarching goal is that regulated providers should report how they report to CIP today for the transition period.
26. Paragraph 47 includes a link to the Regulated Fibre Services Operation Manual.

T6 Traffic Performance

27. Commission staff clarified that there should be a maximum of 96 probes with a distribution of one per Optical Line Terminal (**OLT**) up to the maximum and that it intends to amend the provision to make this clear. Chorus was comfortable with this answer.
28. Commission staff clarified that regulated providers can continue to use existing service profiles during the transition period but would be expected to use the Anchor Service profile for ongoing reporting.
29. Chorus said that it would be easy to use the anchor service profile in light of the clarification around the number of probes.
30. For the number of exceedances Commission staff said to continue with how regulated providers report today for the transition period. This is reporting by percentage, where the measure is the percentage samples where the target was met for $\geq 99\%$ of samples.
31. Regulated providers noted that the number of exceedances could potentially be a very large number while being a very small number if represented as a percentage.
32. Commission staff indicated that regulated providers will be able to give context to the number of exceedances in a free form field when reporting.

T7 Customer service survey

33. Commission staff clarified that the End-User Connection Satisfaction Survey should be carried out quarterly and reported quarterly for the transition period. After the transition period, the survey should be carried out quarterly and disclosed annually.

Chorus was satisfied with this answer.

Quality ID reporting

Provisioning

34. Commission staff confirmed that there are likely to be no simple layer 1 installations and regulated providers agreed. Chorus is the only regulated provider that has layer2 transport services.
35. Chorus noted that the issue for 'P4 Time to Provision FFLAS' was an observation and should not be a problem for disclosure.

Faults

36. It was noted that ONT faults where the customer has turned off power should not be included in this measure (see also paragraphs 22-23).
37. In relation to the 'Time to restore ID FFLAS' measures (F4 and F5), Chorus asked if there are allowances for delays from customers. Chorus noted that it 'stops the clock' if a customer asks for a delay e.g., if a business customer who is not open for the weekend asks for a technician to come on Monday. Commission staff agreed with this approach of not counting time where restoration was delayed by customer action.

Availability

38. Chorus noted that the denominator when reporting availability to CIP is the number of connections at the end of the month instead of the monthly average required by the Commission. Chorus indicated it did not think that this is a big issue but that it will have to change its process.
39. Chorus said it had the systems in place to be able to report the 'Percentage of unplanned outages notified to access seekers' measures (A6 and A7).

Performance

40. In relation to Port Utilisation, Tuatahi asked: where a port exceeds the 95% threshold multiple times over a month, would that port be counted multiple times? Commission staff clarified that the measure reports on the number of ports rather than number of occurrences and so the port would only be counted once per month.

Customer Service

41. In relation to the end-user connection satisfaction survey measure (C1), Commission staff clarified that the initial quality report after the transition period would only include information on the last quarter of the disclosure year.

42. In relation to the Number of missed provisioning appointments (C2). Chorus asked whether, if a customer caused an appointment to be missed, this would count towards the measure. Commission staff clarified that this would not count.

Questions and Answers

Faults, layer 1 and layer 2

43. Tuatahi asked whether, if a layer 2 outage due to a broken fibre connection occurs, that would be reported as a layer 1 and layer 2, or only a layer 1 fault.
44. Chorus said that it currently categorises the reporting on the basis of what caused the fault and therefore a cut fibre is Layer 1. Chorus said this reasoning is reflected in the fact that Layer 1 has longer tolerance for repair and a Layer 1 restoration would take longer, whereas Layer 2 faults can generally be restored faster as they can often be fixed remotely.
45. Commission staff confirmed that faults are to be reported by layer 1 and layer 2 architecture.

Availability, layer 1 and layer 2

46. Commission staff confirmed availability reporting is differentiated by architecture (layer 1 and layer 2), referencing paragraph 7.119.2 of the [ID reasons paper](#).

Regulated Fibre Services Operations Manual

47. Enable asked where the Chorus Bitstream Operations Manual could be found. Chorus added a link to www.chorus.co.nz/ufbervices.