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WISPANZ response to Commerce Commission

In response to the emerging views paper on improving retail service quality through product disclosure

5 December 2022

1. Introduction.
 - a. Thank you for the opportunity to provide feedback and comment on this emerging views document.
2. In this response we will provide feedback on the six issues identified by the commission. WISPANZ supports transparency in all the matters identified in the paper but request the commission engage in consultation with a wide range of stakeholders before making any binding decisions. This needs to include consultation on reasonable timelines for implementation of any solutions and plans for regular milestone check-ins.
3. Implementing any one of these items represents a substantial body of work for any organisation regardless of size. We urge the commission to seek advice from the countries cited in the paper on the length of time taken in those places to implement comparable solutions to the issues outlined in this paper.
4. **Comparing prices, Comparing total costs and Comparing plan inclusions**
 - a. WISPANZ concurs that it can be difficult for consumers to compare any of these aspects of plans. We support the commission's desire for greater transparency in these aspects by making the core elements of plans offers more readily comparable.
 - b. We believe the methodology outlined in the emerging views paper will provide a starting point for improvements in transparency but caution that consultation with industry stakeholders including consumer groups and RSPs will be required to arrive at a suitable model.

We also recommend consultation with groups that can provide input for New Zealanders who may struggle with literacy (including financial literacy) or for whom English is a second language.
 - c. WISPANZ believe that all three aspects are equally important and should be considered together as the most important parts of the paper.

- d. We concur that the TCF's Broadband Product Disclosure Code provides the core of a solution for comparison of plans. We urge the TCF to ensure consumer voice is part of their decision-making process around what is included and excluded from the code and a wide variety of opinions sought on how usable it is for consumers. In addition to alignment with best practice overseas, above all, the summaries need to be appropriate for use in Aotearoa New Zealand's context.

5. Comparing Bundle Pricing.

- a. Although WISPANZ members commonly bundle telecommunications services together into retail packages, bundling non-telecommunications services is still relatively uncommon.
- b. WISPANZ is of the view that the ability to easily compare the price of individual services within a bundle with their unbundled equivalents is desirable.

6. Comparing customer numbers

- a. WISPANZ does not concur that informing consumers of RSP customer numbers is in any way a useful measure of the likely consumer experience or capability of the RSP to deliver a service.
- b. We concur that accurate counts of customers are essential for activities such as calculating various levies or assessing whether a provider has met a particular threshold for statutory obligations. The figures are already provided to various statutory bodies and providing them to the public would do nothing to enhance the customer experience. If the Commission requires these figures for its own use, our suggestion is that it investigate requesting them from the other government departments that already hold them.

7. Comparing mobile coverage.

- a. No WISPANZ members currently operate their own mobile network. Any member reselling mobile services does so as a client of an MNO or MVNO.
- b. We hold no opinion on the usability or otherwise of the coverage maps supplied for public use by any MNO in Aotearoa New Zealand.
- c. Our members who resell mobile services would have to become party to any coverage map changes required of the MNOs. Due to the relatively low volumes and low margins involved in reselling mobile services our hope is that becoming party to these changes would be at low cost to our members.

8. Further engagement.

- a. WISPANZ welcomes this discussion and is willing to remain an active participant on behalf of our members alongside the commission and other stakeholders.
- b. We reiterate that we see that this body of work will require considerable consultation with sector groups with opportunity for the formalized input of consumer voice throughout the process.

Ngā mihi

Mike Smith

Chairperson

WISPANZ