

Wellington Region Emergency Management Office
Draft Copper Withdrawal Code – feedback submission

Feedback provided by:

Richard Mowll, Wellington Region Lifeline Utilities Co-ordinator, on behalf of the Wellington Region Emergency Management Office (WREMO) richard@mowll.nz (021 268 1759)

Feedback copied to Jeremy Holmes, WREMO Regional Manager and Group Controller
jeremy.holmes@wremo.nz (027 297 0811)

Date: 11 June 2020

Feedback:

Thank you for the opportunity to provide feedback on the Draft Copper Withdrawal Code. In general we support the provisions of the draft code, however provide the following feedback:

- An automated forwarder of old phone number calls to a new consumer-nominated number should be maintained for a period to allow the consumer to notify regular and occasional callers of their changed phone number (if relevant).
- Wireless (cell) and VHF radio phone coverage must be available from at least two providers (to allow choice and price competition) in the location (SFA) as alternatives for voice and broadband services and for public information (VHF radio news).
- There should be the ability to live the fibre network (including to consumer level) during short- and long-term outages ('to the fullest possible extent' [using the wording from the CDEM Act 2002, section 60]) in the SFA, to allow continued voice communications in an emergency event that includes a power outage.
- The cost-differential between phone-only-copper service and whichever phone-only technology is adopted by the end consumer should be negligible or minimised. This will ensure that lower-income customers on copper-only services can continue to use phone-only services under fibre-only provision. This is important in an emergency event that has welfare consequences.
- The provisions should remain in place in the event that Chorus is not the primary provider of the copper service (i.e. in the event where Chorus is changed organisationally, or its copper assets are sold to another provider).