

Section 30R reviews of five regulated telecommunications services' standard terms determinations

Explanatory paper

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Introduction

1. We have decided to commence reviews into the terms specified in five standard terms determinations (the **STDs**)¹ under s 30R(1) of the Telecommunications Act 2001 (the **Act**). Under s 30R(2), we may replace a STD or vary, add, or delete any of its terms if we consider it necessary to do so after conducting a review.
2. This document explains our proposed variations to the terms of the STDs, outlines our process for these reviews and assists interested parties to engage with our proposed changes in a simple and meaningful way.

Purpose and objectives of the reviews

3. Our view is that s 30R reviews of the STDs are required in order to implement recent amendments to the Act. Those amendments:
 - 3.1 will remove Chorus's unbundled copper local loop network (**UCLL**) service from Schedule 1 of the Act with effect from 1 January 2020 (see ss 2(1)(a) and 13, and Schedule 2 of the Telecommunications (New Regulatory Framework) Amendment Act 2018 (**Amendment Act**)); and
 - 3.2 prescribe a new annual pricing adjustment mechanism, with effect from 16 December 2019 (see s 69AG of the Act).
4. The STDs contain references to UCLL, and also contain a pre-existing pricing adjustment mechanism. In our view, these clauses of the STDs need to be varied in order to accommodate the relevant provisions of the Amendment Act.
5. In addition, under s 69AG, we will be unable to use s 30R to review the STDs in the period between 16 December 2019 (or 1 January 2020, for certain of the STDs) and our completion of a prescribed 'copper review' (ie, an investigation under Part 1 of Schedule 3 of the Act into whether the regulation of certain copper services in Schedule 1 of the Act should be altered).² In light of this impending regulation 'freeze', we are also taking the opportunity to propose further amendments that will improve the usability of the STDs.
6. Our objective is to make these reviews focused and simple for interested parties to engage with, and to:
 - 6.1 ensure the STDs accurately reflect recent changes to the Act; and
 - 6.2 ensure the STDs remain fit-for-purpose from 16 December 2019 until the completion of the copper review.

¹ A list of the STDs within the scope of this review are provided in Attachment A.

² Under s 69AH(1)(a) of the Act, the Commission must complete the copper review by 31 December 2025.

The scope of the reviews

7. We have limited the scope of these reviews to the following amendments:
 - 7.1 ensure the usability of the STDs after 16 December 2019. Specifically:
 - 7.1.1 removal of references to Chorus's UCLL service as a designated service; and
 - 7.1.2 updating the price adjustment mechanisms to include annual CPI-based pricing adjustments across the STDs;
 - 7.2 amend reporting clauses in the Service Level Terms (**SLTs**) that place unnecessary reporting obligations on Chorus;
 - 7.3 remove outdated implementation and transitional clauses;
 - 7.4 reassign the Interference Management Plan (**IMP**) to the STD for Chorus's unbundled copper low frequency service (**UCLF**); and
 - 7.5 standardise formatting across the STDs.
8. The amendments have been outlined in more detail below.

We invite your views

9. We invite you to provide written submissions on our proposed amendments to the STDs published alongside this paper by **5pm, 23 October 2019**. We will not invite cross-submissions.
10. Our proposed amendments have been 'red-lined' in the attached documents, and explanations of the purpose of the amendments have been specified as comments. We have also provided a table summarising the amendments made to each STD in Attachment B of this document.
11. In particular, we are seeking interested parties' views on whether our proposed amendments:
 - 11.1 accurately remove all linkages to UCLL;
 - 11.2 unintentionally change the meaning of clauses through the removal of UCLL linkages and the formatting changes;
 - 11.3 might lead to adverse effects on stakeholders, particularly access seekers currently sourcing backhaul and co-location services for use with UCLL, by taking effect earlier than required under the Act;
 - 11.4 accurately reflect the updated pricing mechanism in the Act;
 - 11.5 alter the SLTs in a manner that doesn't meet our stated objective; or
 - 11.6 remove implementation and transitional clauses which are still required.

12. If you reference a specific change in your submission, please refer to it using the STD document name and the relevant clause number. For example, "UCLF STD - General Terms, clause 6.2".
13. Please provide your submissions in PDF or MS Word format, capable of text-based search, labelled with the topic 'STD s 30R reviews'. Your submission should be provided as an electronic copy and sent by email to William Turner, c/o regulation.branch@comcom.govt.nz.
14. We intend to publish all submissions on our website. Any confidential information should be clearly marked and preferably included as an appendix. When confidential information is provided, submitters should provide both confidential and public versions of their submissions. The party making the submission is responsible for ensuring that confidential information is not included in a public version of a submission.

Next steps in these reviews

15. This paper commences the public consultation on these reviews as required under s 30R(5) of the Act.
16. Once submissions have been received we will consider stakeholder views as we finalise the amendments to the STDs. We expect to finalise these s 30R reviews and publish our final decision in early December 2019.
17. We have proposed that all of the amendments to the STDs set out in this paper and its attachments should take effect from 15 December 2019. This is because, as noted in paragraph 5 above, under s 69AG(5)(b) of the Act, the Commission's powers under s 30R to vary the STDs for UCLF and Chorus's unbundled bitstream access (**UBA**) are suspended with effect from 16 December 2019 (and will only resume once we have completed the 'copper review').
18. Under s 69AG(2)(b), the suspension of s 30R in relation to the other 3 STDs covered by this paper (ie, Chorus's unbundled bitstream access backhaul, Chorus's unbundled copper local loop network co-location, and Chorus's unbundled copper local loop network backhaul (telephone exchange to interconnect point)) takes place on 1 January 2020, which would allow changes to those STDs to take effect up until that date. However, we consider that there would be some advantage to stakeholders in having all of the proposed changes to the 5 STDs covered by this paper take effect in one batch of amendments on the same day; namely, 15 December 2019. In particular, it would avoid potential confusion in having the amendments take effect on multiple dates.

Proposed amendments

19. We have outlined the context and reasoning for our proposed amendments to the STDs under the relevant headings below.
20. A table summarizing the relevant amendments to each STD has been provided in Attachment B.

Removal of references to the UCLL service

21. From 1 January 2020, Chorus's UCLL service will be removed from Schedule 1 of the Act. Our view is that the STDs need to be updated to reflect the fact that UCLL will no longer be regulated.
22. The relevant context is:
 - 22.1 In 2007 the STD for the UCLL service was created.³
 - 22.2 In 2008 the STDs for UCLL Backhaul and UCLL Co-location were created.
 - 22.3 In 2011 a UCLF STD was introduced and the UCLL Backhaul and UCLL Co-location STDs were amended to include the UCLF service.⁴
 - 22.4 In November 2018, the Amendment Act was passed. Section 2(1) of the Amendment Act provides that the removal of UCLL from Schedule 1 of the Act comes into force from 1 January 2020, and from that date the UCLL STD will therefore no longer apply.
23. We propose to ensure the usability of the STDs by:
 - 23.1 editing the UCLL and UCLF Backhaul and Co-location STDs so that they become standalone **UCLF Backhaul**⁵ and **UCLF Co-location**⁶ STDs;
 - 23.1.1 These STDs apply to "Chorus's unbundled copper local loop network backhaul (distribution cabinet to telephone exchange)" and "Chorus's unbundled copper local loop network co-location", described in Schedule 1 of the Act. After the removal of UCLL from Schedule 1 on 1 January 2020, these backhaul and co-location services will only support the supply of Chorus's UCLF service. These proposed amendments are intended to reflect the new, narrower ambit of these STDs brought about by the Amendment Act.
 - 23.2 removing references to the UCLL STD from all of the STDs listed in Attachment A.

³ Commerce Commission. "Decision 609, Standard Terms Determination for the designated service Telecom's unbundled copper local loop network" (7 November 2007).

⁴ Currently referred to as the UCLL and UCLF Co-location and UCLL and UCLF Backhaul STDs.

⁵ Proposed full title for the STD will be "Chorus's Unbundled Copper Low Frequency Network Backhaul (Telephone Exchange to Interconnect Point) Service".

⁶ Proposed full title for the STD will be "Chorus's Unbundled Copper Low Frequency Co-location Service"

24. If the STD changes occur as proposed on 15 December 2019, it should be noted that during the period from 16 December 2019 to 1 January 2020, cross-references to the UCLL STD and UCLL service would have been removed from the related backhaul and co-location STDs while the UCLL service would remain in Schedule 1 of the Act, and before the suspension of our s 30R powers for the backhaul and co-location STDs on 1 January 2020. Our proposed changes would therefore have the effect of removing any protection provided to access seekers taking the regulated UCLL service through the existence of the backhaul and co-location STDs 15 days earlier than the effective date in the Act.
25. As discussed in paragraph 18 above, we consider that for reasons of certainty and simplicity, there would be some advantage to stakeholders in having all of the proposed changes to the 5 STDs take effect on the same day. We assume that, given UCLL will be removed from Schedule 1 of the Act and so cease to be a regulated service on 1 January 2020, access seekers taking the regulated UCLL service would have taken steps by 15 December 2019 to put in place commercial arrangements for the provision of that service, including any backhaul and co-location requirements. However, we would welcome submissions from any access seekers or other stakeholders who anticipate suffering adverse effects from the proposed effective date for the amendments being 15 days earlier than required under the Act.

Updated price adjustment mechanism

26. The Commission's UBA and UCLL final pricing principle decisions set a 5-year regulatory period, where year 5 is the period from 16 December 2019 to 15 December 2020.
27. Schedule 2 of each STD currently contains a range of mechanisms for the updating of prices and charges. In some cases, the Commission has set particular prices for regulated services for each of the 5 years through an FPP determination. In other cases, prices are updated by Chorus, after the approval of the Commission, in accordance with change mechanisms stipulated in the STDs. These mechanisms include adjusting prices according to changes in a labour cost index, and adjusting prices by allowing for pass through of changes in Chorus's service company costs.
28. Sections 69AG(2) and (3), and (5) and (6), of the Act provide that:
- 28.1 the STDs continue to apply to the relevant service, and the prices that apply "are the year 5 prices specified in the determination"; and
- 28.2 "*those prices*" increase or decrease by an annual Consumers Price Index (CPI) adjustment on 16 December in each year, starting on 16 December 2020 (emphasis added).⁷

⁷ Section 5 of the Act contains the following definitions:
annual CPI adjustment means, in relation to a price, an annual adjustment to the price that is equal to any percentage movement in the CPI as measured between—
 (a) the CPI for the quarter that ended most recently before the price adjustment; and
 (b) the CPI for the equivalent quarter in the preceding year
CPI means the Consumers Price Index (All Groups) published by Statistics New Zealand

29. We consider that there are three possible interpretations of sections 69AG(3) and (6) of the Act and what those provisions imply for the price change mechanisms from 1 January 2020:
- 29.1 Option 1: The reference in ss 69AG(3)(a) and (6)(a) to “year 5 prices” is to all of the prices and charges appearing in the STD as at year 5, whether currently designated as a ‘year 5’ price or not; or
- 29.2 Option 2: The reference in ss 69AG(3)(a) and (6)(a) to “year 5 prices” is only to those prices and charges specifically described in the STDs as ‘year 5’ prices, and, for other prices and charges, the existing price change mechanisms in the STDs (e.g. adjusting prices according to changes in a labour cost index) continue unaffected; or
- 29.3 Option 3: The reference in ss 69AG(3)(a) and (6)(a) to “year 5 prices” is only to those prices and charges specifically described in the STDs as ‘year 5’ prices, and, for other prices and charges, the existing price change mechanisms in the STDs (e.g. adjusting prices according to changes in a labour cost index) cease to apply.
30. Our view is that Parliament’s intention as expressed in sections 69AG(3) and (6) of the Act is Option 1 described above; namely, that all prices in the STDs that apply as at 16 December 2019 (for UBA and UCLF) or 1 January 2020 (for UBA backhaul and UCLF backhaul and co-location) should be regarded as the year 5 prices. Our view is that this includes all charges, recurring and non-recurring and across all STDs listed in Attachment A, even where those charges did not feature a designation as ‘year 5 price’ in the STD.
31. We have reached this view based on our interpretation that:
- 31.1 the words “the prices that apply” in ss 69AG(3)(a) and (6)(a), as an unqualified phrase, should be read as referring to all prices and charges contained in the STDs;
- 31.2 the Commission’s practice has been to update on an annual basis those prices tied to a price change mechanism, after considering and approving a proposal from Chorus. These prices are amended in each of the years of the regulatory period, and there is therefore a set of prices that is specified for each of the prices and charges in the STD in year 5 of that period (other than those where the price is on application (POA)); and
- 31.3 following our interpretation in paragraph 31.1, the references in sections 69AG(3)(b) and (6)(b) to “those prices” being indexed by CPI therefore also refers to all prices and charges contained in the STDs.
32. Given our interpretation of ss 69AG(3) and (6), our proposal is that all of these prices and charges will be subject to annual CPI adjustments from 16 December 2020. The first price adjustment would occur on 16 December 2020.

32.1 Note that the prices listed in these draft amended STD documents are due to be refreshed as part of the annual price adjustment, which is expected to be finalised by 29 November 2019. The final STD documents will be published with the updated prices present. The CPI-based price adjustment from 16 December 2020 would therefore apply to those updated prices.

33. We propose to reflect this change in pricing mechanism by updating the existing mechanisms to reflect the use of CPI from 16 December 2020, and to remove other price adjustment mechanisms which will become redundant (i.e., passing through service company costs).

From 16 December 2019, each year on or before 1 November, Chorus must calculate adjustments to the Prices relating to those Service Components where this clause is the prescribed Price Change Mechanism below. Those adjustments must be by an amount equivalent to the percentage change (up or down) for the previous year) in the Consumers Price Index (All Groups) as published by Statistics New Zealand.

Removing unnecessary reporting obligations on Chorus

34. The SLTs are part of each STD's Terms, which set out the rights and obligations of Chorus and Access Seekers in relation to each service.
35. There are SLT reporting clauses in the STDs that put outdated and unnecessary reporting requirements on Chorus. Chorus is still required to report performance on a monthly basis for services even when there have been no services sold.
36. We propose adding a new exemption on reporting obligations to each STD if no service has been ordered in the preceding month.

If no orders have been received in the preceding month, Chorus will notify Access Seekers and the Commission that no performance report is required for that month.

Removal of redundant implementation and transitional clauses

37. We propose to remove the following implementation provisions:
- 37.1 The UCLF STD Implementation Plan, which is solely dedicated to the provisions for implementing the UCLF service. The document refers to processes that have already been completed and are no longer relevant.
- 37.2 The cabinetisation provisions in the UCLF and UCLF Co-location STDs. The cabinetisation clauses proposed for removal are solely relevant to the process of Chorus's cabinetisation, which was completed in 2012.

Interference Management Plan

38. The IMP is the document that controls the way in which all of Chorus's copper pairs can be used (including by Chorus). It has both spectrum management and safety aspects. The IMP is currently attached to the UCLL STD, which will no longer be in force after 31 December 2019.

39. In order to retain the IMP, we propose that the IMP now be attached to the UCLF STD which will keep the IMP in place at least until the Commission conducts its copper review under s 69AH(1)(a) of the Act.

Standardise formatting of the STDs

40. The STDs have been drafted and reviewed over a ten year period. Over this time, the standard Commission determination format has changed which has resulted in multiple formats across the STDs.
41. We propose to make changes to the STDs to update them to a standardised Commission determination format consistent with our current style guide.
42. Our proposed changes do not alter the content of the STDs, but aim to improve the consistency and usability across the STDs.

Attachment A – STDs under review

1. Chorus's Unbundled Copper Low Frequency (**UCLF**) service:
 - 1.1 General Terms;
 - 1.2 Schedule 1: Service Description;
 - 1.3 Schedule 2: Price List;
 - 1.4 Schedule 3: Service Level Terms; and
 - 1.5 Schedule 4: Operations Manual.
2. Chorus's Unbundled Copper Local Loop and Unbundled Copper Low Frequency Network Backhaul (Telephone exchange to interconnect point) (**UCLL and UCLF Backhaul**) service:
 - 2.1 General Terms;
 - 2.2 Schedule 1: Service Description;
 - 2.3 Schedule 2: Price List;
 - 2.4 Schedule 3; Service Level Terms;
 - 2.5 Schedule 4; Operations Manual; and
 - 2.6 Schedule 5: POI Site Related Information.
3. Chorus's Unbundled Copper Local Loop and Unbundled Copper Low Frequency Network Co-Location (**UCLL and UCLF Co-Location**) service:
 - 3.1 General Terms;
 - 3.2 Schedule 1: Service Description;
 - 3.3 Schedule 2: Price List;
 - 3.4 Schedule 3: Service Level Terms;
 - 3.5 Schedule 4: Operations Manual; and
 - 3.6 Schedule 5: Access Terms.
4. Chorus's Unbundled Bitstream Access (**UBA**) service:
 - 4.1 General Terms;
 - 4.2 Schedule 1: UBA Service Description;
 - 4.3 Schedule 2: Price List;

- 4.4 Schedule 3: Service Level Terms; and
 - 4.5 Schedule 4: Operations Manual.
5. Chorus's Unbundled Bitstream Access Backhaul (**UBA Backhaul**) service:
- 5.1 General Terms;
 - 5.2 Schedule 1: UBA Backhaul Service Description;
 - 5.3 Schedule 2: Price List;
 - 5.4 Schedule 3: Service Level Terms;
 - 5.5 Schedule 4: Operations Manual; and
 - 5.6 Schedule 5: POI Site Related Information.
6. The Interference Management Plan (**IMP**), which is currently linked to the UCLL STD.

Attachment B – Table of amendments

STD	STD document	Document filename	Amendments present in document
UCLF	General Terms	UCLF STD – [Draft] General terms – 3 October 2019	Removal of reference to the UCLL service [21] Removal of redundant implementation provisions – UCLF STD Implementation Plan [37.1] Removal of redundant implementation provisions – cabinetisation [37.2] Attach Interference Management Plan to UCLF STD [39]
	Schedule 1 – Service Description	UCLF STD – [Draft] Sch. 1: Service description – 3 October 2019	Removal of reference to the UCLL service [21]
	Schedule 2 – Price List	UCLF STD – [Draft] Sch. 2: Price list – 3 October 2019	Prices that apply from 16 December 2019 are the year 5 prices [31] Updating the existing price change mechanisms to reflect the use of CPI [33] Prices in the final STD will reflect the 2019 annual price adjustments [32.1]
	Schedule 3 – Service Level Terms	UCLF STD – [Draft] Sch. 3: Service level terms – 3 October 2019	Adding a new exemption on reporting obligations if no service has been ordered [36]
	Schedule 4 – Operations Manual	UCLF STD – [Draft] Sch. 4: Operations manual – 3 October 2019	Removal of reference to the UCLL service [21]
UCLF Backhaul	General Terms	UCLF Backhaul STD – [Draft] General terms – 3 October 2019	Editing to standalone UCLF Backhaul STD [23.1] This STD now only supports the supply of Chorus’s UCLF service [23.1.1] Removal of reference to the UCLL service [21]
	Schedule 1 – Service Description	UCLF Backhaul STD – [Draft] Sch. 1: Service description – 3 October 2019	Editing to standalone UCLF Backhaul STD [23.1] Removal of reference to the UCLL service [21]
	Schedule 2 – Price List	UCLF Backhaul STD – [Draft] Sch. 2: Price list – 3 October 2019	Editing to standalone UCLF Backhaul STD [23.1] Removal of reference to the UCLL service [21] Updating the existing price change mechanisms to reflect the use of CPI [33] Prices in the final STD will reflect the 2019 annual price adjustments [32.1]
	Schedule 3 – Service Level Terms	UCLF Backhaul STD – [Draft] Sch. 3: Service level terms – 3 October 2019	Editing to standalone UCLF Backhaul STD [23.1] Removal of reference to the UCLL service [21] Adding a new exemption on reporting obligations if no service has been ordered [36]
	Schedule 4 – Operations Manual	UCLF Backhaul STD – [Draft] Sch. 4: Operations manual – 3 October 2019	Editing to standalone UCLF Backhaul STD [23.1] Removal of reference to the UCLL service [21]
	Schedule 5 – POI Site Information	UCLF Backhaul STD – [Draft] Sch. 5: POI site information – 3 October 2019	Editing to standalone UCLF Backhaul STD [23.1] Removal of reference to the UCLL service [21]

STD	STD document	Document filename	Amendments present in document
UCLF Co-location	General Terms	UCLF Co-location STD – [Draft] General terms – 3 October 2019	Editing to standalone UCLF Co-location STD [23.1] This STD now only supports the supply of Chorus’s UCLF service [23.1.1] Removal of reference to the UCLL service [21] Removal of redundant implementation provisions – cabinetisation [37.2]
	Schedule 1 – Service Description	UCLF Co-location STD – [Draft] Sch. 1: Service description – 3 October 2019	Editing to standalone UCLF Co-location STD [23.1] Removal of reference to the UCLL service [21]
	Schedule 2 – Price List	UCLF Co-location STD – [Draft] Sch. 2: Price list – 3 October 2019	Editing to standalone UCLF Co-location STD [23.1] Removal of reference to the UCLL service [21] Updating the existing price change mechanisms to reflect the use of CPI [33] Prices in the final STD will reflect the 2019 annual price adjustments [32.1]
	Schedule 3 – Service Level Terms	UCLF Co-location STD – [Draft] Sch. 3: Service level terms – 3 October 2019	Editing to standalone UCLF Co-location STD [23.1] Removal of reference to the UCLL service [21] Adding a new exemption on reporting obligations if no service has been ordered [36]
	Schedule 4 – Operations Manual	UCLF Co-location STD – [Draft] Sch. 4: Operations manual – 3 October 2019	Editing to standalone UCLF Co-location STD [23.1] Removal of reference to the UCLL service [21] Removal of redundant implementation provisions – cabinetisation [37.2]
	Schedule 5 – Access Terms	UCLF Co-location STD – [Draft] Sch. 5: Access terms – 3 October 2019	Editing to standalone UCLF Co-location STD [23.1] Removal of reference to the UCLL service [21]
UBA	General Terms	UBA STD – [Draft] General terms – 3 October 2019	Removal of reference to the UCLL service [21] Attach Interference Management Plan to UCLF STD [39]
	Schedule 1 – Service Description	UBA STD – [Draft] Sch. 1: Service description – 3 October 2019	No changes
	Schedule 2 – Price List	UBA STD – [Draft] Sch. 2: Price list – 3 October 2019	Prices that apply from 16 December 2019 are the year 5 prices [31] Updating the existing price change mechanisms to reflect the use of CPI [33] Prices in the final STD will reflect the 2019 annual price adjustments [32.1]
	Schedule 3 – Service Level Terms	UBA STD – [Draft] Sch. 3: Service level terms – 3 October 2019	Adding a new exemption on reporting obligations if no service has been ordered [36]
	Schedule 4 – Operations Manual	UBA STD – [Draft] Sch. 4: Operations manual – 3 October 2019	Removal of reference to the UCLL service [21]

STD	STD document	Document filename	Amendments present in document
UBA Backhaul	General Terms	UBA Backhaul STD – [Draft] General terms – 3 October 2019	No changes
	Schedule 1 – Service Description	UBA Backhaul STD – [Draft] Sch. 1: Service description – 3 October 2019	Removal of reference to the UCLL service [21]
	Schedule 2 – Price List	UBA Backhaul STD – [Draft] Sch. 2: Price list – 3 October 2019	Updating the existing price change mechanisms to reflect the use of CPI [33] Prices in the final STD will reflect the 2019 annual price adjustments [32.1]
	Schedule 3 – Service Level Terms	UBA Backhaul STD – [Draft] Sch. 3: Service level terms – 3 October 2019	Adding a new exemption on reporting obligations if no service has been ordered [36]
	Schedule 4 – Operations Manual	UBA Backhaul STD – [Draft] Sch. 4: Operations manual – 3 October 2019	Removal of reference to the UCLL service [21]
	Schedule 5 – POI Site Information	UBA Backhaul STD – [Draft] Sch. 5: POI site information – 3 October 2019	No changes
Interference Management Plan	IMP - Part 1	Final IMP - Part 1 – [Draft] – 3 October 2019	Removal of reference to the UCLL service [21]
	IMP - Part 2	VDSL IMP - Part 2 998 Incorporating VDSL Band plan 998 ADE	no changes
	IMP - Part 3	VDSL IMP - Part 3 998 Incorporating VDSL Band Plan 998 ADE	no changes