



ENABLE NETWORKS LIMITED AND ULTRAFAST FIBRE LIMITED

**SUBMISSION ON COMMERCE COMMISSION'S SUMMARY OF
MAIN POINTS RAISED AT THE QUALITY ID WORKING
GROUP SESSION ON 9 SEPTEMBER 2021**

23 September 2021

PUBLIC VERSION

1. Introduction

This submission is made by Enable Networks Limited (**Enable**) and Ultrafast Fibre Limited (**Ultrafast Fibre**) in response to the Commerce Commission (**Commission**) summary of the main points raised at the Quality ID working group session held on 9 September 2021 (**Working Group Summary**). Subject to some specific clarifications below, we agree with the main points outlined in the Working Group Summary.

2. Clarifications – Reference to section in the Working Group Summary

2.1 Provisioning:

- (a) **(2c)** There is no distinction between *simple* and *complex* at the Layer 2 level. This distinction is only relevant at the Layer 1 level for new FFLAS connections.
- (b) **(5c)** We have asked, and have not received a response from, the Commission why they require transport services to be disclosed separately.
- (c) **(6a)** We seek further clarification of the distinction between POI and Candidate Area. We have previously submitted that these terms be interchangeable, because if the Commission attempts to create a distinction between these terms it will cause confusion. Ultrafast Fibre has submitted that this reporting should be consistent with its current annual Information Disclosure reporting to the Commission, which is solely based on the clearly defined Candidate Area's that Ultrafast Fibre operates in: i.e. Hamilton, Tauranga, Hawera, Wanganui, New Plymouth and Tokoroa.

2.2 Performance (22c):

- (a) We identified an error in the Commission's slide in this section 22 and have asked the Commission to issue a clarification regarding sampling 99.9% of the frames and not 99% as stated in the summary of that slide.
- (b) We have submitted to the Commission is that this reporting must remain consistent with the current Information Disclosure reporting regime and requirements.
- (c) We support the proposal that not all I-NNI links need to be sampled and that the number of links be based on a statistical sample rather than 100%.
- (d) The LFCs **did not** state in the Working Group Session that reporting on low quality traffic may be useful. In our view, and as we explained in the Working Group Session, reporting on low quality traffic metric is extraneous and will not be of any value or offer any insight into FFLAS product performance, even to the most informed stakeholder.

2.3 Customer Service:

- (a) **(23a)** We did not agree that the questions in the survey need to be standardised. We did agree that the overall topics need to be high-level, which would allow each LFC to retain the value of historic data.

- (b) **(24a)** We previously submitted to the Commission that a more accurate reflection of LFC performance is to report the total number of appointments vs missed appointments as a percentage.
 - (c) **(24b)** We submit that measuring missed appointments must only apply to new FFLAS connections (installations) that require an LFC technician to attend the end user premises at the appointment time agreed with the end user. This should not apply to the connection of an intact FFLAS service because those connections do not require a LFC technician to attend the end user premises and are activated remotely by the LFC (in accordance with a separate reactivation service level).
3. We thank the Commission for the opportunity to provide feedback on the Working Group Summary and would be happy to discuss our comments in more detail.