



Quality ID working group session

Feedback | Commerce Commission

23 September 2021

## Introduction

1. Thank you for the opportunity to provide feedback on the practical implementation issues discussed at a Commission, Chorus and LFC workshop relating to the Commission's proposed Information Disclosure (ID) requirements for Quality.
2. The Commission has invited interested parties to submit on the main points discussed at the workshop.

## Comment

3. We support the Commission implementing comprehensive ID - interested parties should have sufficient information to assess whether the Part 6 purposes are being met – and maintaining the flexibility to amend ID requirements as the framework beds down. It is likely that further amendments will be required over time<sup>1</sup>.
4. As set out in our earlier submissions, we believe the Commission should strengthen ID proposals to: reflect the transition to an “intact” fibre market; address gaps in the first regulatory period implementation; and facilitate the second regulatory period approach. The transparency provided by ID:
  - a. Can mitigate first regulatory period implementation concerns relating to information asymmetries and gaps<sup>2</sup>, decisions not to set pricing principles<sup>3</sup> or regulatory incentives, and make transparent Chorus signalled changes to current practices<sup>4</sup>.
  - b. Is a means of partially mitigating the Commission's BBM approach on competition and investment. For example, we highlighted in earlier submissions that the Commission risks applying the BBM across competitive markets and transparency can mitigate those concerns.
  - c. Should reflect the transition from a focus on connecting premises to an “intact” fibre market. As the UFB roll out is completed and fibre uptake grows, an increasing number of fibre connections are at already connected premises. Accordingly, the framework should likewise focus more on connections and transfers at connected premises as these activities have more impact on the end user experience. For example, the end-user satisfaction survey should include connections to an intact fibre.
5. Table 1 sets out our feedback on the specific points discussed at the workshop. Commission staff may wish to consult RSPs further on some proposals – as set out in the table – through the Product Forum.

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<sup>1</sup> Spark submission on Fibre ID and PQ draft decisions 8 July 2021 from 83

<sup>2</sup> For example, Chorus has criticised the Commission for proposing to consider innovation expenditure through an individual capex proposal. This approach was driven, in part, by the lack of credible supporting information

<sup>3</sup> Pricing transparency is, in part, intended to mitigate concerns relating to pricing efficiency and competition

<sup>4</sup> Spark cross submission on Fibre ID and PQ draft decisions 5 August 2021

Table 1: feedback on points discussed at the workshop (new items where noted)

| Number              | Metric No | Topic  | Main points   | Spark Comment  |
|---------------------|-----------|--|---|--|
| <b>Provisioning</b> |           |  |   |  |
| <b>New</b>          | P1-P3     | Intact connections   |   | <p>Over 55% of Chorus connections are now at premises already connected to the UFB network - it's important that this is a key reporting metric. This includes reporting on transfers which must be balanced with data on "slamming"/immediate returns.</p> <p>Abandonments are another problem area, and we know from the Commission open letter that the time it takes to complete a transfer is a pain point for end users. We recommend that Commission consider an exception handling reporting measure to reflect that, while many service orders are within the currently defined rules, but a large number do not.</p> |
| <b>4</b>            | P1-P3     | Align provisioning days and provisioning time with RSP SLA | UFF suggested we use "median" rather than "average".  | While median will give a better indication of what is likely, it will obscure the impact of extremely long installs. Using the median risks incentivising a focus on easier installations which are quicker, at the expense of customers who have already been waiting beyond the median. We recommend the Commission consider whether long installs are captured elsewhere.   |
| <b>7</b>            | P1-P3     | Agreed date  | <p>a) It was agreed that "agreed date" is defined as the last agreed date with the end-user.</p> <p>b) There was general discussion about the various appointments measured, how the first agreed date may be shifted more than once for different reasons, and which date the "agreed date" refers to.</p> | <p>We agree that defining the agreed date is important and request that the Commission test the proposed definition with RSPs (perhaps through the Product Forum).</p> <p>In terms of implementation,</p> <ul style="list-style-type: none"> <li>Reporting reschedules has been contentious due to concerns with the underlying data concerns, i.e., the service company may incorrectly report a customer driven reschedule when in fact it wasn't.</li> <li>The measure needs to reflect the customer outcomes, i.e., did the customer get fibre installed on the day they agree to? To</li> </ul>                           |

| Number              | Metric No | Topic  | Main points  | Spark Comment   |
|---------------------|-----------|--|--|---|
|                     |           |  |  | <p>measure this, the Commission needs to identify the “true” agreed date – rather than for each instance of rescheduling – and the date service was given.</p> <p>For example, the measure will need to recognise that some end-user jobs can be rescheduled multiple times (this can be 10 or more times for some customers). There is a risk that each reschedule – which is “forced” but could be seen as a “last agreed” date – resets the counter, even though the customer experience is poor.</p>  |
| <b>Faults</b>       |           |  |  |   |
| <b>Availability</b> |           |  |  |   |
| 17                  | A1-A4     | Average unplanned downtime should remain a rolling average | <p>a) Chorus prefers a rolling-average to smooth any spikes from major events.</p> <p>b) Enable agree, adding that a rolling average would still demonstrate how the network is performing.</p>  | <p>Rolling average will depress the reported numbers during large events, this information itself has value.</p> <p>As it's unplanned downtime – failures and metrics here can be attributed to planning decisions, levels of aggregation etc – and using a rolling average may obscure the impact of events and minimise the reported impact.</p>  |
| 20                  | A5-A6     | Notification to access seekers – unplanned outages         | <p>a) The Commission clarified that an unplanned outage needs to be notified within 2 hours the outage occurring.</p> <p>b) Chorus questioned whether we have a measure of the size of the outage and noted they have a threshold of number of connections before they notify access seekers of an outage. Two of the LFCs stated they also have a threshold.</p> <p>The Commission stated that it would be good to have these thresholds.</p> | <p>We agree there should be defined thresholds for reporting.</p> <p>We would hope that notification of a network outage should be possible a lot faster than 2 hours, but we see examples where confirming the issue and then notifying RSPs may take over an hour. Once an outage is identified and logged at the LFC, we expect that we should at least get a heads up within 1 hour with more info to follow so we can advise our channels. And it's possible that there could be a table based on side of impact or severity.</p> <p>In terms of a B2B outage - impacting large numbers of customers – we recommend a separate measure. In case an unplanned outage should be notified within an hour – at most – of the outage occurring.</p> |

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|-------------------------|-----------|---|---|---|
| <b>Performance</b>      |           |   |   |   |
| 22                      | P4-P7     | <i>Traffic performance</i>                        | <p>Network Strategies (NS) outlined the traffic performance proposal (slides 23-26).</p> <p>a) NS have worked with the Commission to clarify and strengthen Schedule 22 of the Draft Fibre Information Disclosure Determination, 2021 and the CIP document, UFB Performance and Management and Reporting, 2017.</p> <p>b) Chorus noted that we are proposing a significant change as currently it reports traffic performance nationally, rather than by POI Area. It also is contracted with RSPs to report on high priority rather than the low priority traffic (except for frame loss). All regulated providers agreed that the change is significant for them.</p> | <p>As set out in our earlier submission, traffic performance should be reported on a POI area basis. This is important network performance information.</p>   |
| <b>Customer Service</b> |           |   |   |   |
| 23                      | C1        | <i>End User Connection satisfaction Questions</i> | <p>a) The Commission stressed the importance of having all answer the same questions. UFF noted that Chorus and the LFCs have different questions and agreed it needs to be standardised</p>  | <p>We support proposals that the customer satisfaction survey be consistently applied across Chorus and LFCs.</p> <p>In term of the scope of the feedback, the proposed questions relate to the fibre installation experience, and the approach could be usefully extended to the intact connection experience. For example, some installation related questions are equally relevant for an intact connection - including performance satisfaction, likelihood to recommend and coordination between RSPs and LFC – and intact specific questions could include.</p> <ul style="list-style-type: none"> <li>• Ease of getting connected.</li> <li>• Communicated timeframes to get an intact connected vs actual experience.</li> <li>• Communication from RSP for intacts.</li> </ul> |

| Number | Metric No | Topic                      | Main points   | Spark Comment   |
|--------|-----------|----------------------------|---|---|
|        |           |                            |   | <ul style="list-style-type: none"> <li>Whether an intact connection required a technician visit potentially or the ONT cable was missing or had to be relocated?</li> </ul> <p>Commission staff may also wish to:</p> <ul style="list-style-type: none"> <li>Discuss the draft questions further with RSPs to test alignment with consumer concerns and avoid duplication with RSPs customer survey programmes (through the Product Forum).</li> <li>Consider making the language more customer friendly. For example, many customers will not know the difference between RSPs and LFCs so stating upfront what the RSP is in charge of, vs what the LFC is in charge of may make that easier to answer the questions.</li> <li>Consider adding a question relating to the number of times they had to contact the RSP for updates and the number of times the appointment had to be rescheduled.</li> </ul> |
| 24     | C2        | <i>Missed appointments</i> | <p>a) Chorus sought clarification: There are multiple reasons why appointments are moved. Do we want to know where this is the provider's fault? Do we want to see all appointments over the course of a service order – or one per measure? Chorus currently pays a rebate for missed appointments – are these the appointments we want reported here?</p> <p>b) A question was raised that does this apply to new installs, not intact installations?</p> | <p>We agree that missed appointments are a concern for customers, driving consumer concerns and complaints into our channels. Again, this is an area that Commission staff may wish to discuss further with RSPs.</p>   |

[End]