

# Review of the Telecommunications Dispute Resolution Scheme

Thank you for the opportunity to provide input into your review of the Telecommunications Dispute Resolution Scheme (TDRS).

The Internet Service Providers Association of New Zealand (ISPANZ) is the industry body representing internet service providers (ISPs). Our members are predominantly small to medium sized industry players. Our members are retail service providers (RSPs) as mentioned in your consultation document.

## **ISPANZ Member Experience**

Most ISPANZ members are not members of the TDRS. Of those that are, none view it as a 'trusted and useful tool'. Indeed, the experience of one of our members has been limited to receiving and paying invoices. They intend to withdraw from the scheme.

## **Comment on the Draft Report dated 30<sup>th</sup> August 2021**

We agree with the two core areas that need to change, detailed in Paragraph 99.

Noting the content of Paragraph 173, we are strongly of the opinion that TDRS membership should not be compulsory.

We note Table 7, Reference DR23, which states:

“The TCF should actively encourage a broader membership of the TDRS. This should, at a minimum, include engaging on a regular basis with smaller telecommunications providers to encourage them to join, and to understand and address the potential barriers to them becoming Scheme Members.”

Engagement on a regular basis would be welcome. ISPANZ is happy for TCF to contact us at any time. The barriers to our members becoming (or remaining) Scheme Members are:

- the cost of membership, and
- the lack of any actual or perceived benefit (to our members or to their customers) in becoming Scheme Members.

It will be interesting to see what incentives TCF may offer that would offset the cost of scheme membership.

As noted in Paragraph 76, for disputes related to the Commission’s 111 Contact Code and Copper Withdrawal Code, any consumer, irrespective of whether their service provider is a Scheme Member, may lodge a dispute with the TDRS. Table 7, Reference DR24 states:

“Complaints relating to the 111 Contact Code, Copper Withdrawal Code and other Commission Codes are explicitly recognised as being within the jurisdiction of the TDRS.”

Should complaints relating to those codes be made against ISPANZ members who are not Scheme Members, we would welcome clarification of how TDRS would intend to engage with them.



Best Regards,

David Haynes

Chief Executive

23<sup>rd</sup> September 2021