



**FEDERATED  
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Commerce Commission

**Submission: 2022 Review of the Measuring Broadband New Zealand Programme consultation paper**

Federated Farmers of New Zealand appreciates the opportunity to provide feedback on the Commerce Commission's *2022 Review of the Measuring Broadband New Zealand programme* consultation paper.

Our interest as an organisation in the consultation paper centres around the relevance of the programme to telecommunications consumers in rural areas. We appreciate and have supported the Commission's work to improve the situation for consumers through submissions on proposals for Retail Service Quality measures, Telecommunications Dispute Resolution Service reforms, and the marketing of alternative services during copper withdrawal.

Competition is a continuing concern for many of our members, with most seeming to only be able to source their connectivity from a single provider. In those instances where a farmer was able to source their connectivity from more than one provider, we have observed improvements in their experience as they migrate to faster / more consistently reliable internet connections that are better value for money / more affordable. For those only able to rely on a single provider in their area, the situation for rural consumers is a lot more along the lines of 'take it or leave it'.

We support, in general, the proposed enhancements described in the consultation paper for the next phase of the Measuring Broadband New Zealand (MBNZ) programme. Greater coverage of broadband providers and broadband connection types will contribute to a more complete impression of the experience of telecommunications consumers.

We support the suggestion of expanding the MBNZ programme to have regard for the performance of internet connection types additional to those already considered. Our own rural connectivity survey results suggest an increase in the proportion of rural consumers taking up wireless broadband provided by regional wireless internet service providers, satellite broadband services (whether Starlink or other geosynchronous satellite services), and mobile broadband (identified as 'fixed wireless' in MBNZ quarterly reports).

We support the suggestion of greater geographic breakdowns and local results. Disaggregation of performance statistics is important to drive clearer understanding of a fuller range of experiences by telecommunications consumers.

We would be interested in any applicable insights for rural consumers from the MBNZ programme expanding to also test in-home wi-fi device performance. Connectivity in rural areas is generally quite poor and while our focus has been on both encouraging the extension of coverage and improvements to capacity in rural networks to handle ever-increasing demands for bandwidth, we would like to understand the extent to which in-home devices might be affecting the connectivity experience of rural consumers.

We would also be interested in understanding the proportion of volunteers to the MBNZ programme that identify as rural, and the regions in which they are located. This would help identify what opportunities there are for us to assist in closing whatever gaps there may be in volunteer geographic coverage for the MBNZ programme.

Yours sincerely,

**Andrew Hoggard**

National President and telecommunications spokesperson