

## **Quality ID working group session - 9 September 2021**

### **Introduction**

1. This document summaries the main points raised at the Quality ID working group session held on 9 September between the Commerce Commission, Chorus, Ultrafast Fibre (UFF), Enable Networks (Enable) and Northpower Fibre (Northpower).
2. The purpose of the working group session was to discuss practical implementation of our proposed Information Disclosure (ID) requirements for Quality ID to help ensure that these requirements are workable.
3. We published the slides that formed the framework for this session on our website on 10 September 2021.<sup>1</sup>
4. These main points and the discussions should not be taken as pre-determining our decisions. Practical implementation matters will form part of our considerations when making our final decisions.
5. We invite interested parties to provide submissions on these points by 23 September 2021 These submissions will be considered when reaching our final decisions for ID in November 2021.

### **Main points**

6. The main points from the discussions at the Quality ID working group session are summarised in Table 1 below.

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<sup>1</sup> Commerce Commission "[Fibre PQID - Quality ID working group session slides](#)" (9 September 2021)

## 7. Key themes were:

- a. Chorus and the Local Fibre Companies (LFCs who are UFF, Enable and Northpower) want to maintain definitions as defined in existing contractual agreements and requested that we limit any changes, which would increase workability and minimise compliance costs; and
- b. where the Commission defines terms or measures differently than currently defined in contractual agreements, particularly where new data is to be captured and/or reporting has to be developed, this will take time to build.

**Table 1 Key points from discussion on issues**

| Number              | Metric No from slides | Topic                          | Main points  |
|---------------------|-----------------------|--------------------------------|--|
| <b>Provisioning</b> |                       |                                |  |
| <b>1</b>            | P1-P3                 | Business/residential split     | <ol style="list-style-type: none"> <li>a) There was general discussion that while there are some areas where a business and residential split is obvious, eg, plans offered, there are grey areas where the split is not clear.</li> <li>b) All stated that they report this split based on what RSPs tell them and noted that this is therefore somewhat subjective.</li> <li>c) UFF questioned the benefits of providing this split if the information is subjective.</li> <li>d) Chorus said they could carry on with the current Crown Infrastructure Partners (CIP) reporting.</li> </ol> |
| <b>2</b>            | P1-P3                 | Simple and Complex definitions | <ol style="list-style-type: none"> <li>a) LFCs agreed we should use the definition in the Retail Service Provider Service Level Agreements (SP SLAs). There was consensus among attendees that the</li> </ol>  |

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|--------|-----------------------|--|--|
|        |                       |  | <p>simplified definition in our draft decisions has caused confusion and we need to put the detail back in.</p> <p>b) UFF shared the definitions for Simple Orders and Complex Orders, which are new build orders, from their RSP SLA in the Microsoft Teams chat.</p> <p>c) Clarification requested: we ask for disaggregation of Layer 1 and Layer 2 into simple and complex. Should this only be for Layer 1? We clarified disaggregation was for both Layer 1 and Layer 2.</p> |
| 3      | P1-P3                 | Intact not relevant for Layer 1                            | All agreed that intact is not relevant for Layer 1   |
| 4      | P1-P3                 | Align provisioning days and provisioning time with RSP SLA | UFF suggested we use “median” rather than “average”.   |
| 5      | P1-P3                 | Why is transport services separate?                        | <p>a) Chorus noted that Intra candidate Area Backhaul Service (ICABS) is captured in the definition of FFLAS so will need to be reported. However, it doesn’t currently report to CIP so they will need to build new reporting once provided with a clear definition to be able to do this.</p> <p>b) UFF agreed.</p> <p>c) None of the LFCs questioned why transport services are to be disclosed separately.</p>   |
| 6      | P1-P3                 | POI area vs Candidate Area definition                      | a) The Commission confirmed that a POI Area is the same as a UFB geographic area in the Commerce Commission Notice of specified points of interconnection, 19 December 2019. Chorus having 29, UFF having 4 and Enable and Northpower having 1.  |

| Number        | Metric No from slides | Topic                                    | Main points  |
|---------------|-----------------------|--|--|
|               |                       |  | <p>b) All agreed with the definition of a POI Area.</p> <p>c) All agreed that they can report by POI Area.</p> <ul style="list-style-type: none"> <li>○ Enable confirmed that they would report on 1 POI Area; and</li> <li>○ UFF prefer to continue to report on Candidate Areas but confirmed they can aggregate to POI Area reporting.</li> </ul>   |
| 7             | 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>  |
| 8             | P4-P5                 | Business/residential split               | All stated that they report this split based on what RSPs tell them.   |
| 9             | P4-P5                 | Do not align with RSP SLA                | <p>a) It was suggested 20 days for Simple and 50 days Complex to align with RSP SLA which was explained as the target for the median.</p> <p>b) Clarified that the 50/120 days was the jeopardy level which was accepted.</p> <p>c) Chorus and Enable stated that they agree with the reporting thresholds of 50 calendar days for simple new connection orders and 120 calendar days for complex connection orders.</p> |
| 10            | P4-P5                 | Breakdown by geography is not meaningful | a) Chorus questioned the amount of disaggregation required and therefore whether this is useful, noting that for Chorus this may create wild swings and “random numbers” in some areas.  |
| <b>Faults</b> |                       |  |  |

| Number              | Metric No from slides | Topic   | Main points   |
|---------------------|-----------------------|---|---|
| 11                  | F1-F2                 | Business/residential split  | All stated that they report this split based on what RSPs tell them.  |
| 12                  | F1-F2                 | Categories need refining<br>Non-regulated provider faults as 3 <sup>rd</sup> party No Fault Found (NFF) | <p>a) On data reliability: Chorus noted that whilst Layer 1 and ONT faults are obvious, analysis of Layer 2 faults which are done to the point of handover to the ONT can result in less reliable data as Layer 2 faults can be recorded as customer or in premise issues.</p> <p>b) On data reported: Northpower said that they also report on 3<sup>rd</sup> party and proactive faults (found through network monitoring before the customer identifies them). UFF also report on proactive faults. Chorus don't report on proactive faults but are looking into it.</p> |
| 13                  | F3                    | Business/residential split  | All stated that they report this split based on what RSPs tell them.  |
| 14                  | F4                    | <i>Time to restore</i><br>Expected restore date   | <p>a) Chorus questioned definition of "expected date". The Commission clarified where a fault occurs and a customer chooses to have that fault fixed at a later date even though the regulated provider is available to fix it at an earlier date, the later date is the "expected restore date".</p> <p>b) Chorus records expected restore dates and can report these.</p> <p>c) Chorus asked for clarity on how non-working days influence the "time to restore" calculation.</p>   |
| <b>Availability</b> |                       |   |   |
| 15                  | A1-A4                 | Don't aggregate planned, unplanned and force majeure  | <p>a) Chorus said they need to build new reporting although they are already collecting the data in different systems.</p> <p>b) All LFCs record force majeure events manually given they are rare.</p>   |

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|--------|-----------------------|--|--|
| 16     | A1-A4                 | Customer numbers are confidential                          | <ul style="list-style-type: none"> <li>a) Chorus publishes connection numbers quarterly to the stock exchange so there is no issue with reporting customer numbers (except a timing one) although would prefer annually.</li> <li>b) Chorus said the time of disclosure needs to be aligned to the stock exchange release.</li> </ul>  |
| 17     | A1-A4                 | Average unplanned downtime should remain a rolling average | <ul style="list-style-type: none"> <li>a) Chorus prefers a rolling-average to smooth any spikes from major events.</li> <li>b) Enable agree, adding that a rolling average would still demonstrate how the network is performing.</li> </ul>   |
| 18     | A1-A4                 | Planned vs unplanned                                       | <p>All agreed that:</p> <ul style="list-style-type: none"> <li>a) Planned outages are those where the appropriate notification period is met per the Wholesale Services Agreement (WSA).</li> <li>b) Unplanned is anything else.</li> </ul>  |
| 19     | A1-A4                 | How are number of connections calculated?                  | <ul style="list-style-type: none"> <li>a) UFF stated that it would expect DFAS, (eg, a DFAS to a cell phone tower to be counted as 1 user rather than the number of mobile end-users). The Commission confirmed that this is the case.</li> <li>b) Chorus noted a different approach than for CIP who use the average over the <i>measurement</i> period, whereas the Commission propose the average over the time-period.</li> <li>c) Chorus use end of month numbers for all CIP metrics except for average downtime.</li> </ul> |
| 20     | A5-A6                 | Notification to access seekers – unplanned outages         | <ul style="list-style-type: none"> <li>a) The Commission clarified that an unplanned outage needs to be notified within 2 hours the outage occurring.</li> </ul>   |

| Number             | Metric No from slides | Topic   | Main points  |
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|                    |                       |   | <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. The Commission stated that it would be good to have these thresholds.</p>  |
| <b>Performance</b> |                       |   |  |
| 21                 | P1-P3                 | <i>Port utilisation</i><br>5-minute intervals | <p>a) Northpower noted that it does not sample at 5-minute intervals and would require development to meet this requirement.</p> <p>b) UFF wanted to know when a port gets notified as exceeding port utilisation (is it one 5-minute interval?). The Commission said that it would be further clarified in the determination and that it was any 5-minute interval. Enable said they had discussed this with Chorus and were happy they now understood.</p>   |
| 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>a) One LFC suggested reporting on both low and high priority traffic may be useful.</p> |

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|                         |                       |   | <ul style="list-style-type: none"> <li>b) LFCs were concerned also about workability of this proposal and public perception of the perceived performance of the network. One LFC suggested using a threshold of 7ms rather than 5ms.</li> <li>c) One LFC questioned the usefulness of this data when exceedances of these performance measures won't prompt any action. The Commission emphasised that this is about ID reporting rather than setting targets.</li> <li>d) Northpower questioned the suggestion of 100 probes per network; they currently have 1 probe per OLT. There is no desire to oversample on smaller networks where 1 probe per OLT is sufficient and we need to be clear about that in the definition.</li> <li>e) UFF sought clarification that 99% of frames within the test sample still stands. UFF interpretation of this is that they eliminate 1% of the worse frames and then do the analysis on the remaining.</li> </ul> |
| <b>Customer Service</b> |                       |   |  |
| <b>23</b>               | C1                    | <i>End User Connection satisfaction Questions</i> | <ul style="list-style-type: none"> <li>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</li> <li>b) Chorus questioned the purpose of the survey and the Commission confirmed it does partly serve to compare performance between LFCs. The Commission confirmed that it is also important to see the trend in LFC performance over time.</li> <li>c) Chorus said they change their surveys over time as did Enable as its customer service strategy changes. UFF similarly uses its survey to "run its business" and noted that this is data they report on and so don't want to lose the history.</li> </ul>   |

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|--------|-----------------------|----------------------------|---|
|        |                       |                            | d) Suggestions included that the Commission keep the questions high-level, reduce to 4-5 questions, or have one overall question.   |
| 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> |