

Submitter	Theme	Summary of key message	Report changes proposed	Changes to be made	Notes	Amendment pinpoint reference
ADR Centre	Awareness	Some options to improve consumer awareness including emails to consumers, on front page of websites and informing legal professionals who could relay the information to consumers.	No	No change made.	To be raised with TDR for their consideration.	None
ADR Centre	Awareness	Agree re recommendation about when to inform consumer.	No	No change made.	To be raised with TDR for their consideration.	None
ADR Centre	Governance	Budget independence may not be needed to ensure independence (or at least the perception of it) occurs. Reporting and KPIs could manage and resolve issues.	No	No change made.	To be raised with TDR to be reviewed as part of their work on independence.	None
ADR Centre	Membership	Membership should be mandatory.	No	No change made.	Outside scope of this review.	None
ADR Centre	Membership	Establishing a second scheme provider would help services - improving competition is valuable and helps manage resources.	No	No change made.	Outside scope of this review.	None
ADR Centre	Practice Management	Suggestions to improve practice management such as case managers with specific training, dedicated peer review team, clear dispute scope info, multiple language option and adding a tikanga based framework to the scheme.	No	No change made.	To be raised with TDR for their consideration.	None
Anonymous	Governance	Lack of independence through conflict of interests, hidden decision making processes and imbalance information.	No	No change made.	This is addressed in the report as part of our recommendations.	None
Chorus, Enable and Tuatahi	Awareness	Support the recommendations to continue to raise awareness of the scheme.	No	No change made.	Aligns with report.	None
Chorus, Enable and Tuatahi	Cost	Recommendations must avoid disproportionate costs on scheme and industry. Higher costs may mean new members don't want to join.	Yes	Clarify the reporting is not meant to be onerous, time consuming or costly.	Agree. Report updated to clarify this.	Paragraph 22
Chorus, Enable and Tuatahi	Governance	Think the governance structure should not change until new structure can be evaluated.	Yes	Increase timing for independence review.	Agree. Report updated to give additional time for this review.	Table 2 page 15, Table 3 page 57
Chorus, Enable and Tuatahi	Jurisdiction	Recommendations must also not encroach on providers commercial decisions relating to network coverage.	Yes	Clarify that we want the review to ensure correct issues are not excluded.	Agree. Report updated to clarify this.	Paragraph 91
Chorus, Enable and Tuatahi	Jurisdiction	The current network coverage exclusion should be retained as it could impact commercial decisions and thus competition in the market. All of the relevant situations are already within the scope of the Scheme.	Yes	Clarify that we want the review to ensure correct issues are not excluded.	We maintain our position that a review of the current exclusion is needed to ensure it is working correctly but we will clarify the intent of the review.	Paragraph 91
Chorus, Enable and Tuatahi	Cost	Unclear what benefit propose 6-monthly or annual reporting would provide. Commission needs to balance compliance costs with benefits.	Yes	Clarify the reporting is not meant to be onerous, time consuming or costly.	Agree. Report updated to clarify this.	Paragraph 22
Chorus, Enable and Tuatahi	Scope	Agreed that there are no further recommendations on wholesalers.	No	No change made.	Aligns with report.	None
Chorus, Enable and Tuatahi	Systemic Issues	Support the recommendations that the Scheme's data collection and analysis be improved.	No	No change made.	Aligns with report.	None
TCF	Code compliance	While there are dual responsibilities, overarching for TCF code compliance including Care Code rests with TCF.	Yes	Change wording on R2024.3 to "Develop an appropriate compliance programme" (remove testing).	Agree. Report updated to clarify this.	Table 2 page 15, Table 3 page 57
TCF	Governance	TCF budgetary approval essentially a "rubber stamping process". 25% TCF shareholding to minimise fiscal risk during transition. Historically TCF always approved every operational budget proposal.	Yes	Increase timing for independence review.	We believe risk is significant. However we have updated the recommendation to give additional time for this review.	Table 2 page 15, Table 3 page 57, Paragraph 231.
TCF	Governance	While supportive of independence, too early to reassess governance structure.	Yes	Increase timing for independence review.	We believe risk is significant. However we have updated the recommendation to give additional time for this review.	Table 2, Table 3, Paragraph 231.

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TCF	Governance	Leave TDR for now to focus on short term work including systemic issues. Governance a longer-term pathway TDR just embarking. Look at next review in 2027 otherwise Commission can invoke powers for interim review if issue arises.	Yes	Increase timing for independence review.	We believe risk is significant. However we have updated the recommendation to give additional time for this review.	Table 2, Table 3. Paragraph 231.
TCF	Jurisdiction	TDR should evaluate coverage complaints by referencing requirements and parameters in TCF codes and Commission guidelines to ensure consistent approach.	No	No change made.	Scheme must have regard to industry RSQ codes and TCF codes when considering a dispute and determining resolution. TOR and Care Code references.	None
TCF	Jurisdiction	Coverage maps always indicative. The way maps are used and understood should align with TDR approach to assessing coverage complaints including taking into account limitations and indicative nature of maps.	Yes	Clarify that we want the review to ensure correct items not excluded.	We maintain our position that a review of the current exclusion is needed to ensure it is working correctly but we will clarify the intent of the review.	Paragraph 91
TCF	Jurisdiction	TDR should evaluate broadband performance or marketing against requirements and parameters in TCF BM Code and Comm BMG.	No	No change made.	Scheme must have regard to industry RSQ codes and TCF codes when considering a dispute and determine resolution. TOR and Care Code references.	None
TCF	Jurisdiction	Disagree with paragraph 94 of draft report of consumer risk in tying complaint process to a voluntary TCF code.	No	No change made.	Risks remains.	None
TCF	Systemic Issues	Systemic issues framework important but need time to be mature and effective. TCF will support TDR.	No	No change made.	Aligns with report.	None
TDRL	Code compliance	Other than TOR compliance, TDR cannot conduct wider industry compliance assurance for TCF codes.	Yes	Change wording on R2024.3 to "Develop an appropriate compliance programme" (remove testing).	Agree. Report updated to clarify this.	Table 2 page 15, Table 3 page 57
TDRL	Code compliance	Ad hoc assessment of compliance but otherwise TCF remit.	Yes	Change wording on R2024.3 to "Develop an appropriate compliance programme" (remove testing).	Agree. Report updated to clarify this.	Table 2 page 15, Table 3 page 57
TDRL	Governance	Industry has not resisted appropriate funding for TDR in the past and expectations that industry will continue to be supportive.	Yes	Increase timing for independence review.	We believe risk is significant. However we have updated the recommendation to give additional time for this review.	Table 2 page 15, Table 3 page 57
TDRL	Governance	Revise R20 rating from Amber to Green.	Yes	Change governance to Green but ensure that risk is still highlighted.	Agree. Report updated.	Table 1 page 10, Paragraph 204.
TDRL	Jurisdiction	Suitability of exclusions important and will conduct periodic reviews to ensure TDR jurisdiction is relevant and inclusive.	No	No change made.	Noted.	None
TDRL	Jurisdiction	Report underrepresents impact of the changes to exclusions, numbers dropped and no indication of material impact on consumer access based on jurisdiction.	Yes	Include "number of excluded complaints" in relevant sections.	Agree. Report updated.	Table 1 page 10, Paragraph 85.
TDRL	Membership	Supportive of increased membership, working towards that and needs support from policy makers and Comm for universal membership.	No	No change made.	Aligns with report.	None
TDRL	Cost	Need to balance reporting requirements against consequential costs and burden. Cannot commit to timeframes. To discuss with Commission.	Yes	Clarify the reporting is not meant to be onerous, time consuming or costly.	Agree. Report changed to clarify this.	Paragraph 22
TDRL	Usage	Comparison based on 2021 data.	Yes	Wording to clarify in paragraph that comparison data from 2021 and no recent data at time of review.	Agree. Report updated.	Paragraph 59
Utilities disputes	Awareness	Supportive of investment in outreach.	No	No change made.	Aligns with report.	None
Utilities disputes	Awareness	Scaling back of the budget for awareness is worrying - this should be stable, planned and sufficient.	No	No change made.	Aligns with report.	None
Utilities disputes	Awareness	Focus on key consumer groups mentioned in the report would be valuable.	Yes	Clarify we expect such groups to be targeted with awareness and engagement.	Agree. Added to the report.	Paragraph 117

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Utilities disputes	Scope	Review lacks detail in key places.	Yes	Reiterate that this review was targeted and focused on the implementation of the previous recommendations.	The launch of the review stated that this would be a targeted review focused on implementation of recommendations made in 2021.	Paragraph 2, Paragraph 27.
Utilities disputes	Scope	Review didn't go to the same level of detail as last review.	Yes	Reiterate that this review was targeted and focused on the implementation of the previous recommendations.	The launch of the review stated that this would be a targeted review focused on implementation of recommendations made in 2021.	Paragraph 2, Paragraph 27.
Utilities disputes	Governance	The structure of TDR is complex, limits independence and may not be resourced appropriately.	No	No change made	The model was subjected to consultation with industry and stakeholders. However, independence and resourcing have been addressed in the report.	None
Utilities disputes	Usage	Figures comparing TDR and UDL are not accurate.	Yes	Add note "UDL has submitted that the usage comparisons is closer to 4 times".	Agree. Added to the report.	Paragraph 59
Utilities disputes	Usage	TDR numbers seem low compared to other schemes and totals should be increasing, not decreasing.	No	No change made	Agree. Addressed in the report.	None
Utilities disputes	Usage	TDR doesn't differentiate between complaints and queries which can be misleading.	No	No change made	To be raised with TDR for their consideration.	None
Utilities disputes	Usage	A complaint summary could be a useful tool for TDR to produce - there is some mention of written commentary but nothing formal and like this.	No	No change made	TDR has a complaint summary form which is built up as the complaint progresses and is accessible to complainant and the provider. It is a centralised document and assessed by CRK to be more transparent than other EDRs and good practice. To be raised with TDR for their consideration.	None