



25 August 2021

Commerce Commission

**Marketing of alternative services to consumers during copper/PSTN withdrawal**

Federated Farmers of New Zealand appreciates the opportunity to provide feedback on the Commerce Commission's *Marketing of alternative services to consumers during copper/PSTN withdrawal* open letter to the telecommunications sector.

The provision of telecommunications services in rural areas is a matter of particular concern to the Federation and its farmer members. Our interest in this area is primarily focussed on increasing the availability of rural telecommunications services, improving the quality of those services, and encouraging efforts that enable better use of such services to support the farm business and rural household.

Federated Farmers supports the inclusion of principles and outcomes along the lines described in the open letter to address service performance claims in advertising put forward by telecommunications companies. Many of our farmer members have consistently raised with us concerns that rural broadband connections to the farm are frequently unreliable and run at slow speeds. This is despite claims made by a number of rural broadband internet service providers that they offer "fast broadband" or promote average speeds on their network.

We run a farmer survey every year exploring their experience of rural connectivity, whether internet connections to the farm, mobile coverage across the farm and whether their landline connections are still fit for purpose. Our most recent survey was undertaken last year and showed that almost 2 in 3 farmers endure internet connection download speeds of 0-20Mbps, with the greater proportion of farmers in the 0-5Mbps range.

Given the issues our own farmer members have with internet connections not performing as advertised or inferred by some rural broadband internet service providers, Federated Farmers recommend the Commerce Commission explores applying the proposed principles and outcomes more broadly than the confines of the Copper Withdrawal Code.

Yours sincerely,

**Andrew Hoggard**

National President and telecommunications spokesperson