

16 June 2023

Commerce Commission  
Level 9  
44 The Terrace  
Wellington 6011

To whom it may concern,

In response to the request for views on the Commission 111 Contact Code Review dated 18 May 2023 the Police submits the following feedback for your consideration:

**Questions 1-5:** No response to questions 1 -5.

**Question 6:** **Do you have any changes you would suggest making to the Code to improve its effectiveness and/or outcomes for vulnerable consumers?**

**Submission:** Police suggest that the Ambulance Service providers, Hato Hone St John and Wellington Free Ambulance, are explicitly listed as one of the 'interested persons' per foot note 7 for paragraph 19.2.

**Question 7:** **Do you have any views on any other matter related to the Code and/or the vulnerability of consumers who rely on the 111 emergency service?**

**Submission:** The Emergency calling number relates only to 111 landline voice calls on the NZ Telecommunications network and excludes mobile, international calls, satellite, text, and data mechanisms for contacting emergency services during an emergency.

Landline phone calls now account for only 15% of 111 calls to Police, this places further importance on the need for a code for mobile and text channels of communication.

In general, the NZ Emergency Service Organisations (ESOs) (NZ Police, FENZ, ST Johns, Wellington Free Ambulance etc) and the Spark 111 service do not take anything other than voice calls to 111. Some years ago, NZ Police set up and currently operate a limited 111 SMS text service for the deaf and speech impaired community on behalf of all ESOs.

Recently Apple launched their SOS satellite emergency service available to only customers with Apple handsets and One NZ and 2 Degrees have announced they intend to improve access to their networks through satellite and messaging to 111. While this improves access it understandably comes at a cost which could further isolate some members of the community.

In future it would be helpful if the Emergency Calling Code could be extended to cover other communications channels (such as text and

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messaging) that vulnerable consumers may increasingly become reliant on when needing to request help from the emergency services.

Within this context Police would like to see consideration given to an appropriate legislative mechanism to be put in place to require commercial providers of communications channels to allow for communications, such as 111 text messaging, to be available at no cost to consumers (private or business) and able to be used regardless of whether there is any credit available on the device (specifically cellular and other mobile devices). This would help to ensure that where communications channel which may be able to be used during a power outage (due to holding a charge) could be used by all consumers, particularly the most vulnerable in our community, to contact Emergency Services if they need help during an emergency event.

#### Paragraph 49

We noted the question raised by Retail Service Providers (RSPs) who provide services to business customers only that are unsure why they are subjected to the Code.

Police support the need for RSPs who provide services to business customers only to be subject to the Code and required to comply with the Code because emergencies can occur in any location and people, including vulnerable employees or business owners, should be able to contact emergency services to request help no matter where they are.

Should you require clarification of the Police submission please direct this to the Director of the Police Emergency Communications Centre, Acting Superintendent [REDACTED] in the first instance.

Yours sincerely

[REDACTED]

Mike Johnson  
Assistant Commissioner – Corporate Operations  
(Senior Business Owner, Police Emergency Communications Centre)

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