

29 August 2021

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Commerce Commission  
Regulated Industries - Telecommunications  
via: website

## **RURAL WOMEN NEW ZEALAND (INC) SUBMISSION**

### **Marketing of alternative services to consumers during Copper/PSTN Withdrawal**

#### **Introduction**

1. Rural Women New Zealand is committed to supporting and strengthening rural communities through the empowerment of rural women and children and we are submitting our opinion on the open letter entitled: *Marketing of alternative services to consumers during copper/PSTN withdrawal*, to seek changes that will ensure equity of service provisions for rural telecommunications consumers.
2. Although we appreciate the recognition of the complaints, and being approached for our opinion, RWNZ members understand the promising future that new technology might provide however have some concerns we would like to address.
3. RWNZ would like to take this opportunity to express its concern that rural consumers should not be disadvantaged in this transition and further, that copper lines should not be removed from rural New Zealand particularly where there is little to no cellular coverage, or where alternative technology is not yet available at a reasonable cost for rural consumers.

#### **General Comments**

4. RWNZ Members have indicated that next to health, their most pressing concern that impacts on their quality of life in rural New Zealand is the lack of digital infrastructure and technology. Many report little or no cellular coverage and no or little reliable, affordable, consistent internet.
5. RWNZ has a fundamental belief that every household in New Zealand should have a telephone service that meets their household needs.
6. RWNZ believes that the lack of cellular coverage and little to no internet is a health and safety issue for people living in rural communities. Having digital or telephone access to call emergency services when needed is a basic human right.
7. RWNZ is concerned that the removal of copper lines is going to put rural women, families and communities at risk of not having access to a working telephone when there is a power cut or intermittent power.
8. RWNZ needs assurances that emergency calls can be made in rural New Zealand once copper is removed, where the calls are not dependent on cellular coverage or a power supply.

9. RWNZ requests, if not already being carried out, that when giving the notice for the transition, that the providers include true costs. Our members expressed concern at the monetary cost of the transition, and how certain properties might not be able to afford to transition. This is particularly so, if families are expected to provide their own infrastructure to their house and buildings from the edge of their property when they have not requested the transition.
10. RWNZ is concerned about families and businesses in rural areas where there is no option for telecommunication services apart from copper lines and the possibility of being disadvantaged by a reduced speed through copper lines.
11. RWNZ would like telecommunications companies to ensure that copper lines provide the same speed as alternative technologies available elsewhere.

### Specific Comments

12. RWNZ would like assurances that the speed of the transition away from copper lines does not mean that pressure is applied to rural residents to transition where the consequences lead to a less reliable landline service than that provided by copper lines.
13. We agree with point 8 in the letter and would like to also add, that some rural residents are being pressured into telephone products such as VOIP which rely on power to run. Power cuts and intermittent power supply are problematic in rural New Zealand and so relying on copper lines for a landline service is the very least our rural communities expect.
14. RWNZ would like to see rural residents included as an affected party in Point 10 of the letter because rural consumers are highly likely to not have alternative technology options available to them...
15. Point 11 covers off rural consumers in the group 'never had the ability to do so' however, RWNZ would also like to see longer timeframes for rural consumers included as a point for suppliers.
16. Point 13 of the letter poses a question for RWNZ - if Chorus stop supplying all copper services, who supplies it to those that don't have access to alternative technology?

### Specific comments on the Outcomes

We support all of the Outcomes, however would like to add the following:

17. Outcome 1: RWNZ would like to see a clause included which ensures that rural consumers who do not have access to alternative technology or expensive access are assured that copper lines are still available to them
18. Outcome 2: RWNZ would like to see a clause included which specifically mentions rural consumers, as their needs and the services available to them, are different from urban-based New Zealanders
19. Outcome 3: RWNZ would like to see a clause added which ensures that rural consumers are advised of how the alternative technology will behave should

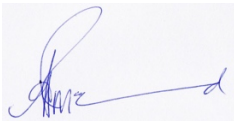
there be a power cut or any differences in behaviour of the service caused by distance from the source

20. Outcome 4: RWNZ would like to see a clause added which covers off the installation of any extra equipment or infrastructure needed to transition to available technology for rural consumers
  - Our preference is that there is no change to service in any of the three scenarios provided, especially in a power cut.
21. Outcome 5: RWNZ would like to see a clause added which ensures the provider gives all information regarding the cost of the installation of any infrastructure needed to transition to available technology for rural consumers, particularly when this pertains to infrastructure required from the farm gate to homes or buildings. This is especially needed for those rural consumers in areas where copper lines are being withdrawn and the rural consumer has no choice but to move to an alternative service.

### About RWNZ

1. Rural Women New Zealand (RWNZ) is a not-for-profit, member-based organization that reaches into all rural communities and has an authoritative voice on rural environment, health, education, technology, business and social issues.
2. RWNZ strives to ensure that all rural residents, workers and families have equitable access to services, inequalities are addressed by Government, and the wellbeing of rural communities is considered from the beginning of all policy and legislative development.
3. RWNZ is affiliated to the Associated Country Women of the World and as such upholds all United Nations, ILO, FAO and WHO conventions and outcome statements as they relate to women and rural women in particular.
4. RWNZ would like to draw particular attention to the United Nations Sustainable Development Goal 3, Good Health and Well-Being, which ensures good quality of life and well-being for all ages, as well as Goal 10, Reduced Inequality, that promotes resolving discrepancies within and between countries.

Nāku iti noa, nā



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