

# ISPANZ Submission on

## Draft Product Disclosure – Retail Service Price and Cost Guidelines

### Introduction

You have asked for submissions on your Draft Product Disclosure – Retail Service Price and Cost Guidelines. Thank you for the opportunity to comment. ISPANZ has no comment on the guidelines for mobile coverage maps.

### Comment

ISPANZ welcomes the intent of your initiative – to assist consumers to make informed decisions. Our members are fully aligned with that intent. We note that the stated purpose of the Guidelines, as detailed in Paragraph 5 of the consultation document, is fourfold. We recommend that you limit this to a single purpose or aim. Having multiple aims risks losing focus on what you are trying to achieve, and what do you do if the achievement of one purpose is detrimental to achieving another purpose? ISPANZ considers that the purpose in Paragraph 5.2 should become the sole purpose of the guidelines and that the things detailed in sub-paragraphs 5.1, 5.3 and 5.4 be listed as potentially beneficial outcomes if the purpose is achieved. We consider that the sole purpose of the guidelines be limited to:

“to ensure consumers who are considering purchasing a mobile or broadband retail telecommunications service can make fully informed

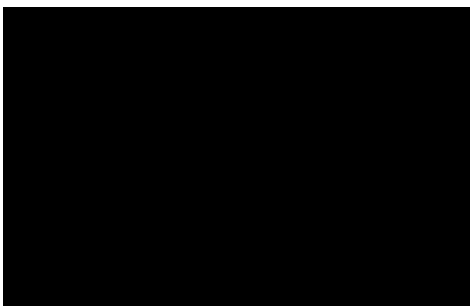
decisions about which RSP and plan is best for them, including by enabling consumers to meaningfully compare plans offered by the same or different RSPs if they wish to do so.”

ISPANZ agrees that the Guidelines should be just that, guidelines which RSPs will use their best endeavours to achieve, but where there is no penalty for non-compliance.

Paragraph 19 expects TCF to prepare new standardised offer summary templates. It is recommended that this paragraph have an additional sentence added:

“In preparing the new standardised offer summary templates for broadband offers, TCF should consult with all RSPs in New Zealand.”

Thank you for the opportunity to comment on your draft guidelines.



David Haynes

ISPANZ Chief Executive

15<sup>th</sup> March 2024