

10/02/2023

ATTN: Commission for Improving RSQ (Telecommunications)

Commerce Commission New Zealand

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**Re: Improving Retail Service Quality: Customer Service  
Consultation Paper**

Dear Commission Members,

1. Thank you for allowing the opportunity to provide our thoughts regarding the improvement of retail service quality within the telecommunication industry. Wireless Nation has always strived to keep a constant customer first approach and welcome the chance to discuss improving customer service within our industry.
2. Customer service is an important part of our industry and there should be more support provided for consumers to make informed decisions regarding what level of customer service they want in an RSP.
3. We believe that overall, the plan outlined within the consultation paper is on the correct path to both allowing informed consumer decisions and driving RSPs to improve customer service.
4. There are however some areas where we believe the Commerce Commission should put further thought to ensure their decisions do not unfairly affect the market.
  - 4.1. Our key concern is with point 35 of the consultation paper regarding which providers are included in the customer satisfaction survey. Our view is that including only large providers could lead to consumers choosing providers less suitable for them by believing the providers listed on the dashboard are the best option for a good customer service experience without being informed that smaller providers (which may be more suitable for them) are being excluded from the ranking and may offer on par or better customer service than those listed. We believe smaller providers should have the right to be included if they wish.



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5. Please see below for our answers to specific consultation questions outlined in the Improving Retail Service Quality: Customer Service Consultation Paper.

**5.1. Do you agree that our proposed approach to monitoring provider customer service levels and publishing a provider ranking dashboard based on key customer service metrics will be beneficial to consumers by helping to inform their choice of provider and will encourage improvements in customer service?**

Yes, we agree that providing consumers information regarding the level of customer service provided by different providers will both allow consumers to make more informed decisions and encourage providers to improve their customer service.

**5.2. Do you agree with the industry-sourced information that we propose to collect from providers, as set out in Table 1? What other information should be included, and why? Should any information be excluded, and why?**

Yes, we agree with the information proposed.

**5.3. Do you agree with the proposed calculation methodology for the industry-sourced information based on the metrics set out in Attachment A? If not, why and what do you think is a better way of defining these metrics? How do you believe agreement should be reached on a consistent calculation methodology?**

Yes, we agree with the information proposed.

**5.4. Can you produce the industry information using the proposed calculation methodology set out in Attachment A without incurring significant costs? If not, why not?**

Yes, we can provide the requested information, some of it will require process changes and system development.

**5.5. Do you believe the industry-sourced information based on the metrics in Table 1 should be provided by all mobile and broadband providers? If not, why not? Is there a minimum that we should set as a threshold (in terms of number of customers that a particular provider serves) before including them in those providers that we monitor/report on?**

We believe that it should be required for all providers over a set minimum threshold (i.e 10,000+ connections) and should be optional for smaller providers as the amount of time and reporting functionality needed could be burdensome for small providers.



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5.6. **Can you provide the industry-sourced information on a quarterly basis? If not, why?**

Yes, we can provide information on a quarterly basis.

5.7. **Can you provide the industry-sourced information for residential and SME customers separately?**

On many of our channels there is no separation between residential and SME customers, we believe that this will likely be the case for many providers and that there should not be a requirement for separation between residential and SME customers.

5.8. **What is your preferred approach for the Commission requesting this information from industry? Are there benefits to a voluntary approach versus a statutory information request?**

A voluntary approach is best as it means that any providers that find it hard to provide this information (for example smaller providers that may not have reporting capabilities) can opt out.

5.9. **Where do you think is the most useful place for providers to publish the dashboard to ensure it is available to consumers (for example, provider homepages, provider mobile and broadband plan webpages, provider brochures and sales collateral and/or provider own branded retail store windows)?**

The dashboard should be shown on webpages with Mobile/Broadband plans as this is the main point where consumers will finalise any decisions. They should also be shown in retail storefronts for the same reason.

5.10. **We are proposing the dashboard is updated every six months. Do you agree with this frequency? If not, what frequency do you recommend and why?**

Yes, a six-month frequency is enough to allow current information to be shown and show industry and provider specific changes.

5.11. **We are proposing that provider rankings are calculated using six-month rolling data. Do you agree with this calculation period? If not, what period do you recommend and why?**

Yes, six-month rolling data is a fair and logical way.



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5.12. **Do you think that consumers should be provided separate customer service ranking dashboards for mobile and broadband services? Or would a combined dashboard, showing a provider's overall rankings be better for consumers, even if this shows providers who offer both mobile and broadband services alongside broadband only providers?**

We believe having one score per provider is aiding simplicity and giving an incentive for providers to provide consistent high quality across their offerings and teams.

5.13. **What is your preferred approach for requiring publication of the dashboard by providers, should this be on a voluntary basis, or should the Commission use its RSQ code powers to require this?**

We believe that providers who are required to join the scheme or who opt in to it should be required to publish the dashboard.

Yours sincerely,

**Jacob Kirdy**

Customer Experience and Retention Leader

Wireless Nation Limited



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