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Submission provided via email

Changing technology (Satellite and calling/txting anywhere)

If the txt / calling anywhere via Satellite that is currently being advertised comes into reality this year or next year, it will fundamentally change how people contact 111. While the time lines could be a bit ambitious it is very likely to be a reality this decade.

Other factors that will impact this are if it is all the time (24x7) or only during certain times of the day and the availability of handsets for end users (e.g. only having it on a \$1500 phone would be a limiting factor for many users)

At the point it is widely available to end users at a reasonable cost, it is likely this code should again be reviewed and many sections may become redundant. The entire code may no longer be needed.

There is a heavy emphasis on the RSP and little on the network providers

Many mobile and fixed line service rely on roadside cabinets and mobile towers. Some of these components of the network may have either no or limited battery backup.

Consideration should be given to a whole of network approach rather than just the end user premises. Some core network/transport nodes for some network providers also have similar limitations.

Cyclone Gabrielle presented a number of large outages (outside the Hawkes Bay / Gisborne areas) due to loss of power including a large part of Northland.

It may be worth considering how these components impact the ability for users to contact 111 and if the code needs to be expanded to include these in some form.

The code can impact if service providers offer retail landline services

The code has resulted in some service providers deciding if they want to offer retail landline services and in what areas

In some cases they will offer retail landline services only in mobile coverage areas so they can meet the requirement under 21.2

For areas outside mobile coverage the requirements under section 21.3 is too high and to ensure they don't risk breaching the code and to avoid discrimination have stopped offering the service to all users.

This ends up offering end users less options and choices.