



# UBA s30r workshop paper

June 2016

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# Framework

## The issues

- Issues across service description, price/quality and end-user experience.
- Ensuring regulated service remains relevant in a dynamic market and regulatory environment.
- STD provisions no longer promote efficient operation of the service/market or a good experience for end-users.

## Section 18

Section 18 directs the Commission to promote efficient outcomes, and those that we'd see in a competitive market.

Section 18 is best promoted:

- By providing an underlying input service that grows so it remains capable of meeting consumer needs;
- Where the full functionality inherent in deployed technologies is made available as new versions and upgrades released;
- Where the service promotes efficient investment and operational choices; and
- Performance is aligned with price.

# Proposed amendments

## Promoting efficiency/drivers

- Expected UBA outcomes clear – an underlying input service that continues to meet consumer demand
- Update service description for current practice and demand
- Remove impediments to efficient operation of service and investment – define NRCs and transparency
- Operational change to improve end-user experience
- Access to diagnostic tools and platform capabilities for ongoing improvement



## Amendments

1. Codify expected UBA outcomes
2. 10xGE and VDSL
3. Codify expected service performance
4. New variants (clause 10)
5. Define connection charges
6. BUBA backhaul demarcation
7. Transparent asset and investment management
8. Provisioning events
9. Fault events
10. Diagnostic tools and processes

\*Technical workstream

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# Service description

## The issue

- Lack of clarity around expected performance undermines RSP and customer confidence.
- VDSL is a key part of UBA service, yet not explicitly provided for.
- Some aspects promote inefficiency: around 70% of handovers are 10xGigE, and all new handovers would be if were available today.

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## What needs to happen

- Codify UBA service outcomes.
- Set service objectives – uncongested platform, obligation to add capacity, and service speed objective.
- Update service description for VDSL and 10xGigE handover.

## Amend:

1. Service Description (**SD**) to clarify that UBA is an underlying input service that makes the full capabilities of platform available to access seekers, and grows over time.
2. SD to set Service Objective that UBA is an uncongested service that supports the maximum service speed of the line;
  - a. EUBA: Chorus to add capacity so that no route is more than 80% full at peak time;
  - b. BUBA: Chorus to mitigate end user impact of technology choices and provide time bound plans to resolve congestion (currently in backhaul);
  - c. To maintain service speed as set out in Chorus' ADSL report.
3. SD to clarify VDSL and add 10xGigE handover options.
4. Price List to provide 10xGigE handover at UFB price (connection and monthly). Multiple GigE price capped at that of 10xGE when Chorus unable to provision.

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# New variants (clause 10)

## The issue

- No principled basis for service to evolve over time
- Light-touch process for new variants relied on “lead” by retail arm of vertically integrated access provider and equivalence / non-discrimination.
- Weighted towards variants outside rather than inside regulated service
- Clause 10 process is opt out.
- Clause 10 does not provide its own remedies and conclusions – e.g. NZCC to revert to powers under the Act

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## What needs to happen

- Balance approach so that access providers and access seekers can drive new variants.
- Make process agnostic to whether variants occur within our outside regulated service.
- Clarity should be provided on the Commission’s role – being to confirm new variant inside or outside regulated service, and most likely power – e.g. approve, decline, conditions.
- Clear set of remedies and processes required within clause 10

## Amend:

1. General Terms (**GT**) to provide that:
  - a. Access seekers may request new variants within regulated terms. The clause should then set out requirements for Chorus to give full considerations and respond to request;
  - b. Access seeker may require new feature of regulated service if features readily available / nascent;
  - c. Ability for Commission to “pause” proposals that are not straight forward;
  - d. Clarify circumstances when and ability of Commission to require changes to the proposal from Access Seeker.
  - e. Consider whether approval of change process under section 9 is now relevant to section 10
  - f. Consider whether a middle ground should be specified between Commission “approved” or “not” – e.g. changes required or conditional approval

# Efficient network management and investment

## The issue

- Disconnect between service performance and FPP decisions.
- No performance improvement model.
- NRC are sometimes defined in a way that impedes operational efficiency and investment – shifting costs on to end users.
- Service demarcations impede lifecycle replacement.
- Poor end user experience – broadband performance (and difficulty in resolving) is our number 1 customer gripe.

## What needs to happen

- Remove financial incentives to defer lifecycle replacement – remove incremental distance and throughput charges for legacy ATM handovers.
- Define NRCs to internalise Chorus investment and operational decisions/costs (and align with FPP).
- Require Chorus commitments to upgrade legacy platforms and lifecycle transparency.
- Make Chorus the primary responsible party for NFF charges.

## Amend:

1. Price List (**PL**) to provide that only a remote connection can apply to reconnect a premises, except where the prior service was a UCLL. Define requirements for change from UCLL.
2. SD so BUBA handovers only incur distance steps from the BRAS handover (logical FDS), and clarify that throughput charges are not permitted.
3. PL so that BUBA handovers incur no charge where an access seeker's existing co-located Ethernet handovers have sufficient capacity for traffic.
4. GT obliging Chorus to make asset and investment management plans for key components transparent, with committed replacement and new capability plans\*.
5. GT obliging Chorus, for the ATM based BUBA service, to make transparent and agree with Commission a time bound transition plan.

\*Chorus current plans if sufficient, or could be based on clause 2.6 of Electricity Distribution disclosure requirements.

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# Provisioning events

## The issue

- One of the top pain points for customers – significant number of provisioning events result in faults.
- ~900 failed connections per month.

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## What needs to happen

- Visibility at pre-qualification stage of service availability and expected service performance.
- Baseline for work completed so can manage customer interaction and provide a benchmark for a fault event.
- Create incentives for Chorus to make operational changes.
- Agreed splitter install guidelines including location, interaction with home alarms, record keeping.

## Amend:

1. Operations Manual (**OM**) so that, at pre-qualification, RSPs have visibility of:
  - a. Whether a port is available (currently delayed registering);
  - b. Connection required to make service live;
  - c. Status of home wiring (whether Chorus has installed a splitter).
2. OM so that Tech certificates at completion of site visit or failed provisioning event that the service was tested, performing to expectations and stable (incl. measured performance).
3. OM to align incentives:
  - a. No charges for a manual investigation where pre-qualification information is not available;
  - b. Connection charge not more than signalled in pre-qualification;
  - c. No NFF, or in home charges, where line not subsequently working to standard.
4. OM to provide clarity around wiring (splitter) standards.

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# Fault events

## The issue

- The fault process leaves consumers confused and frustrated, and RSPs and consumers with high costs.
- Current appointment booking practices are more service company focused than facilitating end user requirements.
- Up to 25% of charged events are vigorously challenged by end users.
- Limited Chorus incentives to address - where uncertainty to cause, STD defaults to end user charges.

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## What needs to happen

- Better define conditions of a fault so customers can understand them.
- Provide better tools for fault trouble shooting.
- Cancellation charges only apply where it is truly the customer's fault/choice.
- Increase visibility of NFF sign off documentation.
- Better align Chorus incentives to focus on faults and service performance.

## Amend:

1. OM so that at the time the fault is cleared/closed, tech certifies service performance and results of investigation/activity (outside current notes field).
2. GT so that degradation to the service performance is an unplanned outage, and that service failing to meet the Service Objective is a Chorus fault event.
3. GT and OM to align incentives:
  - a. Reversing NFF onus so that Chorus must demonstrate the service was working to the service objective at time of reported fault to charge;
  - b. Cancellation charges not to apply where records indicate service did not perform to the objective at time fault was recorded, or where tests show service is clear at time of cancellation;
4. OM so that Chorus:
  - a. Provides an explanation for cancellations;
  - b. Provides specific times for appointments.



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# Diagnostic tools and processes

## The issue

- Limited ability for RSPs to manage network outages. Currently rely on data drawn from our own systems to link customers to network equipment.
- Chorus has provided a roadmap and this hasn't occurred. Boost indicates that there are real possibilities to improve service.
- Current access limits more efficient RSP models.
- Using customers as alarms for the network.

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## What needs to happen

- Better diagnostic information so we can better/more efficiently identify where a fault lies.
- Timely event notifications.
- Able to set and manage customer expectations.
- Encourage more Chorus engagement on access to 5530 tools.

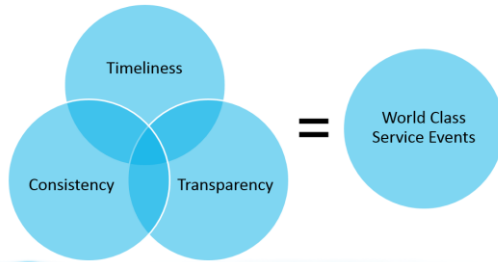
## Requirements:

1. Ask Chorus to report back by the end of July on options to provide:
  - a. Reporting on congested routes and network elements, and planned network augmentation or mitigation activity so that RSPs can set and manage customer expectations;
  - b. RSPs remote visibility of customer line performance metrics off the DSLAMs (i.e. via an API that provides performance reporting);
  - c. RSPs access to alarms and notifications relating to UBA platform service impacting events.

# Build on Chorus events strategy and Boost

## Service Events – Strategy Overview

The strategy is based on delivering Service Events to our Customers based on three key principles;

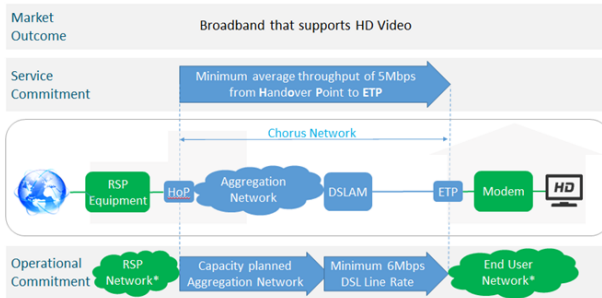


## Better tools to provide better and more information

When you place a fault, our reporting should have helped you isolate where the fault is.



## Boost service commitments



\* Commitment excludes issues outside Chorus' control e.g. RSP, End User and International networks

## Service Events – Quick Wins

