



**TCF Submission to
Commerce Commission
On the draft Product Disclosure – Coverage Map Guidelines
15 March 2024
PUBLIC VERSION**

A. Introduction

1. Thank you for the opportunity to comment on the Commerce Commission’s draft Product Disclosure – Coverage Map Guidelines (draft Guidelines). This submission is on behalf of TCF Members: 2degrees, One NZ, Spark and Mercury.
2. This submission is provided by the New Zealand Telecommunications Forum (TCF). The TCF is the telecommunications sector’s industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF member companies represent 95 percent of New Zealand telecommunications customers.
3. This submission is focussed on the process the Commerce Commission has indicated it will follow to develop the final Guidelines and the engagement with industry stakeholders. TCF Members will provide their own submissions on the detail of the proposals in the draft Guidelines.

B. Consultation process

4. The TCF would like to acknowledge the engagement with Commission staff to date on these draft Guidelines. We also appreciate the extension provided for submissions.
5. We support the Commission’s proposed approach to consultation on these product disclosure Guidelines, particularly that the Commission intends to carry out further consultation on the proposals before finalising the Guidelines in the latter part of this

year. The proposals in the draft Guidelines relate to complex technical issues and it is important that the Commission works closely with industry to ensure that the final Guidelines are practical and deliver intended outcomes for consumers.

6. The final Guidelines should be focussed on the outcomes the Commission aims to achieve and the TCF supports the overarching objective of enabling consumers to make informed decisions about mobile services.
7. As noted above, some of the Commission's proposals are technically focussed. The TCF is available to assist the Commission in facilitating future workshops with industry subject matter experts to work through these technical matters before the final Guidelines are issued.
8. Finally, the TCF supports a more pragmatic timeline to develop the final Guidelines by the end of the calendar year, this will enable all parties to work together to help achieve the desired outcomes in a practical way.
9. The TCF is available to answer any questions related to the views set out in this submission and looks forward to continued engagement on its retail service programme. Please contact [REDACTED]