



National Office
Level 10, 175 Victoria St
Wellington 6011
PO Box 12-021, Wellington 6144
New Zealand
Phone 04 473 5524 OR 0800 256 467
e-mail: enquiries@ruralwomennz.nz
www.ruralwomennz.nz

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Submission: 111 Contact Code Review
Commerce Commission
telecommunications@comcom.govt.nz

RURAL WOMEN NEW ZEALAND (INC) SUBMISSION

111 Contact Code Review

Introduction

Rural Women New Zealand (RWNZ) welcomes the opportunity to provide a submission to the Commerce Commission on the 111 Contact Code Review: Draft amended Code and the associated Decisions and Reasons paper.

Comments

RWNZ supports the intention of the proposed amendments to:

- Clarify the scope and obligations for providers under the Code;
- Refine the ways that information about the Code is provided to consumers and improve consumer protection; and
- Improve the information that is disclosed to the Commission.

To ensure these intentions are met, we request that the following matters affecting vulnerable consumers in rural locations be addressed.

Exclusion of business landline services

We note the proposed amendments include clarifying that the Code applies to residential landline services and not to business landline services.

The Decisions and Reasons Paper sets out in Para 44 that in making the Code the Commission considered that:

44.1 there were likely to be some small business consumers (e.g., farms, dairies) which have vulnerable consumers residing on the premises, and this subset of vulnerable consumers entitled to the protection of the Code.

RWNZ does not believe the matter of small business consumers (particularly in rural areas) which have vulnerable consumers residing on the premises has been addressed by the amended Code.

Our concern is for vulnerable rural consumers whose farm/small business landline also serves as their residential landline service.

The Code is 'intended to provide resiliency in the home'¹. We question how this can be achieved if landline services that serve a dual residential and business function are classified as business landline services and subsequently excluded from cover by the Code.

We recommend that the Code is strengthened by either providing for, or requiring, service providers to determine how they distinguish between residential and business consumers. If not already known, we suggest that providers be required to monitor how many vulnerable rural consumers are reliant on a landline service.

The Code should also include a clause stating that where there is doubt over whether a consumer who resides at a location shares a landline service with a business, that the landline is to be treated as a residential service until determined otherwise.

Requirement to inform consumers about options available

RWNZ supports the proposed amendments² to explicitly require providers to inform all consumers about options available for vulnerable consumers in an easily discernible manner. This will ensure that consumers are not able to purchase a retail landline service from the provider without seeing that information³.

The Code requires that the information must be easily and clearly visible on the relevant page of the provider's website in a manner that is prominent and consistent with the NZ Government Web Standards.

RWNZ hopes the requirement to provide information in an easily discernible manner also applies for consumers who do not have internet access as well as those for whom English is not their first language.

¹ Para 47, 111 Contact Code Review – Draft Decisions and Reasons

² Para 54, 111 Contact Code Review – Draft Decisions and Reasons

³ Section E of the Draft 111 Contact Amended Code 2023

Closing

RWNZ recommends that the Commerce Commission address the needs of vulnerable consumers in rural locations for whom the residential landline service may be classified as a business landline because their service has a dual purpose.

Thank you for the opportunity to provide input.

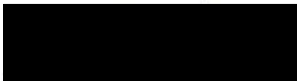
About Rural Women New Zealand

Rural Women New Zealand (RWNZ) is a not-for-profit, member-based organisation that reaches into all rural communities to provide a credible and respected voice on rural environment, health, education, technology, business and social issues.

RWNZ strives to ensure that all rural residents, workers and families have equitable access to services, inequalities are addressed by Government, and the wellbeing of rural communities is considered from the beginning of all policy and legislative development.

RWNZ is affiliated to the Associated Country Women of the World and as such upholds all United Nations, International Labor Organisation (ILO), Food and Agriculture Organisation (FAO) and World Health Organisation (WHO) conventions and outcome statements as they relate to women and rural women in particular.

Nāku iti noa, nā



Gabrielle O'Brien
Chief Executive