



Submission on the Commerce Commission's Paper on Improving Retail Service Quality: Customer Service

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Introduction

1. TUANZ is pleased to submit in relation to the emerging issues paper released by the Commerce Commission on the 14th December 2022 in relation to possible improvements to transparency around customer service for broadband and mobile services. This submission is a Public Version and contains no confidential information.
2. Our address is PO Box 65503, Mairangi Bay, Northshore 0754 or Level 7, 62 Victoria Street West, Auckland Central. Our email address is office@tuanz.org.nz and our website can be found at <https://www.tuanz.org.nz>.

The Technology Uses Association of NZ Inc (TUANZ)

3. TUANZ is the association for the users of digital technology and connectivity which is in its 36th year since incorporation. We are unique - **we believe there is no other group or organisation that is representative of the people and organisations that are the end users of digital technologies in the manner that TUANZ is. We value our independence and will always seek to speak for users without undue influence.**
4. Our members want to see a lift in the digital economy along with the continued development of strong markets across the technology and connectivity sectors providing real choice for end users – whether corporations or consumers. We seek a national drive to leverage the opportunities that we have with our world leading digital networks. **Our current vision is one where New Zealand is one of the top 10 digital ready nations by 2030.**
5. TUANZ position is consistent and clear: **The availability of competitively priced, good quality, fast connectivity in all parts of NZ is a critical economic enabler for the future of the NZ economy.**
6. TUANZ is a not-for-profit membership association with over 170 members, predominantly large organisations with a strong dependency on digital technology and connectivity as well as small enterprises and individual members. These small businesses and residential users are the

customers of our large corporate members, who are just as focused on the quality of their customers' connectivity as their own.

Our general position on improving retail service quality

7. In our submission to the Commission on their Baseline Report released in September 2021, we stated our support of moves to improve retail service quality from the communications providers in Aotearoa New Zealand.
8. In that submission (15th October 2021) we agreed that the list of proposed retail service quality matters were ones that we would like to see addressed.
9. Customer service, or lack thereof, is consistently one of the issues that we receive a number of emails on from end users. Certainly when consumers are shopping around for services, the only measure that they can consistently compare is price, which once they have taken up a service, is only one element of their ongoing satisfaction.
10. Our overall position is that we support and agree with the Commission's moves in seeking to improve retail service quality. Below we provide brief answers to the questions included in the paper released on the 14th December 2022.

Response to Questions

Overall proposed approach to informing consumer choice and improving customer service levels

11. **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?**

TUANZ has consistently supported any move to improve the baseline of customer service for consumers in New Zealand. As stated in the paper, users at this point rely on pricing and product features when signing up to a service, with customer service only really being a factor once the user needs to interact with the provider but there is also no easy way at

present to compare the providers customer service record. We believe that the transparency that should come about with the introduction of the publication of this information will support users to make informed decisions at the time of initial purchase. Ranking in itself isn't necessarily the most important reflection of service quality but it does allow the user to compare the various providers and so we support the publication of results in ranked order.

Monitoring providers' customer service performance

- 12. 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?**

We are comfortable that these are the list of measures that should be collected from providers at least initially. As mentioned in the report at x17, consumers have two real concerns when it comes to dealing with their provider - the speed of resolution and staff helpfulness and knowledge. Any measures that assist in understanding performance in these areas must be retained.

We would like to see a regular review of the measures reported to ensure they continue to meet the objectives and assist consumers in judging the overall customer service experience.

- 13. 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?**

We have no view on the specific manner of calculating these metrics other than reiterating the importance of the consistency of approach across the industry to ensure meaningful comparisons.

- 14. 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?**

Our preferred position would be that all providers in the market should be required to provide this information but understand that it might add an unfair cost on the smallest providers. We would be open to supporting a threshold based on the size and regional reach of providers.

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

Not Applicable

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

Not Applicable

17. 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?

We are comfortable with the Commission's initial plan to take a voluntary approach. In some ways this will highlight those providers who are unwilling to provide their information and thereby signal to consumers that they may not place enough emphasis on the quality of service. However, we would encourage the industry to note that if this leaves significant gaps in the results, that the Commission is empowered to issue statutory information requests.

Publishing provider customer service rankings

18. 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)?

In our view providers should publish dashboards in places where they expect consumers to make purchasing decisions. This would include in their retail stores and somewhere in hard copy collateral and contracts which is clear and unambiguous. Online it should be published

somewhere in the sign up process prior to the customer making the final decision to purchase services.

- 19. 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?**

We support the period of six months as an initial starting point for this type of reporting with a preference of moving to quarterly once the processes are embedded. However, as technology develops and the information begins to be used, we believe that there is the possibility that a near real time on-line dashboard could be developed.

- 20. 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?**

It would be our preference that given the difference in the nature of the two markets, that there should be separate customer service ranking dashboard for mobile and broadband. Consumers often make purchasing decisions about the two different services separately and at different times. This is also to reflect that mobile services are only provided by a subset of providers in the market which would mean that a combined dashboard could lead to incorrect comparisons.

- 21. 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?**

Again we are comfortable if the Commission's initial plan is to take a voluntary approach. This would be a visible reminder to consumers on which providers are unwilling to provide their information and thereby signal to consumers that they may not place enough emphasis on the quality of service.

Final Comments

- 22.** TUANZ welcomes the opportunity to provide the Commission with this submission in regards to the issues and solutions raised in this paper.

This submission provides answers to questions in the letter based on our experiences that represent actual users of technology and digital communications. As always we have attempted to provide a succinct and clear enunciation of the views of our members.

23. We look forward to working further with the Commission on this matter..

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