

Submitter: [REDACTED]

Submission provided via email

Question 1: In your experience, how has the implementation of the Code impacted the ability of vulnerable consumers (as defined in the Act) to contact the 111 emergency service during power failures? Please provide any evidence you have which supports your views.

We have had no impact with our clients, due to the ability to have reliable cell coverage. Also, a lot of consumers that indicated they were vulnerable either never filled out the form to start the process or had adequate phone coverage. [REDACTED] has no current vulnerable consumers

Question 2: Do you believe that the solutions that have been provided to vulnerable consumers have been effective in providing an appropriate means of contacting 111 during an outage? Why do you hold that view?

No, there isn't a standard solution that all companies can use, instead of leaving providers to create their own solutions bearing the costs and time to do so. [REDACTED] has not had to deploy a solution so it cannot comment on how effective it was to deploy and implement.

Question 3: Do you believe that RSPs have effectively informed consumers about the options available for vulnerable consumers? Why do you hold that view?

I can only speak on behalf of [REDACTED] which has been able to effectively discuss the 111 code requirements with any new clients, clients moving to a VoIP solution, and reminding its current clients every year. There could possibly be more information and education to consumers from the commerce commission that would help reach out further nationwide.

Question 4: In your view, are all landline consumers being made sufficiently aware of the risk of loss of service during a power outage? What evidence do you have that supports that view?

Yes they are, but there could always be more education around it with the correct information specifically education about copper landlines still being at risk to power failures and corrosion. Coming from the WISPA conference this week, a lot of RSP's advised that the clients were under the impression that copper was never going to fail and that internet phone lines were not fit for purpose.

Question 5: In your experience, are the prescribed processes for demonstrating vulnerability effective and accessible for consumers and their representatives? What are the reasons for your view?

No, there needs to be more education about what indicates a consumer being vulnerable. A lot of consumers are not aware that a working cell phone in reception is a sufficient backup form to contact 111.

Question 6: Do you have any changes you would suggest making to the Code to improve its effectiveness and/or outcomes for vulnerable consumers?

Focusing on resiliency and backup plans with all telcos. In case of a disaster, there needs to be a plan to allow for all consumers to be able to not only contact 111 but their families. Having a plan set in a place where all local RSP's and major RSPs can communicate and work together to ensure the nation is looked after and able to take a proactive collaborative approach. 111 is no use in case of a disaster (cyclone Gabrielle for example), but ensuring that there is redundancy planned to allow for communications and power to either stay online or have a minimal impact should be the focus going forward.

Further rollout with satellite communications with ONE and 2degrees will change how the code should be laid out due. There will need to be a relook at what a vulnerable consumer is, and alternate solutions that are cost-effective that utilises up-and-coming technology.

Question 7: Do you have any views on any other matter related to the Code and/or the vulnerability of consumers who rely on the 111 emergency service? Please provide as much detail as possible.

N/A