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This is an important step, as it allows us to test all information received from stakeholders in a fully transparent way. However, we recognise that there may be cases where submitters wish to provide us with confidential information in a submission.

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Submission details

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Is your submission on behalf of an individual or an organisation?

Organisation name

Submission topic *

Does the submission contain confidential information?

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Extra information

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SUBMISSION ON 111 CONTACT CODE

1. INTRODUCTION

1.1 This submission is made on behalf of the Grey Power New Zealand Federation Inc.

1.2 The contact is Bern Sommerfeld – email – lynbern@xnet.co.nz

1.3 The Grey Power New Zealand Federation (Inc) is a non-sectarian and non-party political, advocacy organisation that aims to advance, promote and protect the welfare and well-being of older people.

1.4 The Grey Power New Zealand Federation (Inc) is made up of some 75 individual Associations with an overall membership of approximately 68,000.

1.5 The Grey Power New Zealand Federation (Inc) thanks the Commerce Commission for the opportunity to comment on this important issue.

2. COMMENTS BASED MORE OR LESS ON THE QUESTIONS PROVIDED ON THE INFOGRAPHIC PAPER AND WITH REGARD TO THE RELEVANT PARTS OF THE EMERGING VIEWS PAPER.

(Please note - we refer to clause numbers as provided in Emerging Views paper.)

- Grey Power agrees, in general, with the paper's approach to ensure that everyone has an appropriate way to call 111 in a power outage.

Mobile Technology:

We believe clauses 68 (providers to supply an appropriate means for contacting 111 at no cost), 70, 71 & 74 (basic mobile voice and/or text connection) are reasonable mobile technology alternatives.

Non-mobile Alternatives:

- We more or less agree with Clause 37 that those consumers who have a copper land line service should not be provided with an alternative because corded phones are available and will work during a power outage.

- Grey Power knows that although the majority of the population have access to mobile phones, 50% of people 85 years old + do not use digital technology at all (<http://www.superseniors.msd.govt.nz/about-superseniors/ageing-population/better-later-life-report/index.html>). This is also the group who are more likely to need an emergency

service and therefore continuous access to 111 in the event of power failure. We agree as stated in clause 79, that a battery backup may be appropriate; however, the provider would need to supply thorough instructions/assistance with this, especially for older people to whom these devices may be confusing to set up and use.

Unfortunately, we are unable to offer any other alternative non-mobile suggestions for this cohort because we do not have the technical expertise. We do however, with reference to clause 78, caution that if the decision of what to supply is to be the responsibility of the provider our older, older people may not be well catered for and even if they are offered choices of appropriate alternatives may not understand what options are available and how to use them.

- Grey Power sees merit in clause 85's suggestion of a register to identify and record the status of consumers' access to the emergency 111 during in a power cut.

- Grey Power agrees with clause 89 re the minimum period for back-up for use of the emergency 111 in a power outage especially that the experienced duration of power cuts during significant events e.g. the Christchurch earthquakes should be utilised. However, this raises an interesting point because clause 53 mentions customer vulnerability based on both long-term predictable needs such as medical conditions or disabilities and short-term more unpredictable factors e.g. accidents. If the power outage lasts longer than the fixed back-up period the vulnerable groups, i.e. everyone, as above, will still be vulnerable.