Copper Services Investigation

We believe the most basic assessment around deregulation of copper services (and the assumption of a full withdrawal within 10 years of all copper services if it is deregulated), is can all the other networks provide an equivalent or better level of service today and into the future for both voice calling and broadband internet if copper is withdrawn.

That would include ensuring the future needs and requirements of consumers including the need for higher speeds, low or consistent latency and growing data caps would not be adversely impacted by copper deregulation.

Defining the copper services

Some existing copper services such as UCLL and SLU are in a grandfathered state. If these services are no longer available or used, the commission should consider how it handles these areas. The review should focus on current copper services which include EUBA (ADSL 2+) and VDSL.

Defining geographic areas

We agree that using alternative networks available is a good method, but have some concerns when it comes to wireless services (WISP and FWA) coverage in relation to hills, valleys, dense trees and other geographical features that can either reduce or prevent service.

This may not always be easy to capture and GIS, mapping and data which may be provided and used in assessing alternative networks availability could lead to incorrect assumptions if these factors are not managed or addressed.

Additional Evidence

Areas we believe should be considered as part of the evidence

- Accuracy of Fixed wireless/4G/5G coverage information, what the coverage map or data shows vs what you can get in the real world are not always the same.

- Fixed wireless /4G/5G sites come and go from stop sell, the dynamic nature of this makes it hard to measure and needs to be considered. What maybe available today may not be available a week later. This can make valid assessment challenging.

- Some Fixed wireless (4G/5G) sites maybe on restricted stop sell meaning you can't get unlimited plans but can get capped ones (e.g. 200Gb), these are also changeable.

• Fixed wireless (4G/5G) has a pricing divide for urban vs rural pricing, when comparing costs there can be a large difference between urban and rural. (Please note that some of what is rural was defined under RBI1 and may not fit what people traditionally consider rural areas)

• Peak load assessment: Some towers are more prone to congestion at certain times of the year, such as the summer peak or school holidays. Depending on how data is collected and analysed this may not be picked up.

• Rural towers often have several bands/ frequencies, however some bands can only service customers a short distance from the tower, normally leaving the Band 28 (700mhz) for further away customers. This in cases may lead to stop sell or poor service for the further away customers while nearby customers get good service. Any analysis needs to consider more than just the tower or cell.

• LEO satellites are new to the market. Gaining an understanding of if and how likely congestion or stop sells are likely should be considered. LEO satellites can cover a large area, impacts of an issue or congestion could have wide impact on entire regions.

Other Considerations

- Wholesale market

  Current copper services are offered to RSPs as a wholesale service. Some services such as FWA and some WISP also offer a wholesale service. We believe this creates a dynamic and competitive ISP environment; considerations should include any impacts or reduction in competition from wholesale services. (example, LEO satellite + WISP + VDSL, if VDSL is removed, that goes to just LEO satellite and WISP, that results in a large reduction in RSPs that can offer options down to effectively 2 retailers). Rural FWA products can have a much higher wholesale cost than comparable ADSL 2+ and VDSL services which is then passed onto consumers.