

Improving Retail Service Quality: Customer Service – Consultation Paper

**Tuatahi First Fibre Limited submission to the
Commerce Commission**

16 March 2023

Connect Better

1. Thank you for the opportunity to provide feedback on the Commission's paper *Improving Retail Service Quality: Customer Service – Consultation Paper*, dated 14 December 2022 (**Consultation Paper**).
2. We supply wholesale fibre access services to retail service providers (**Retailers**) who, in turn, package up those services and retail them to consumers. We cannot provide retail fibre (or any other type of) services directly to consumers, and must treat all Retailers the same (ie we cannot and do not discriminate between retailers on product, price, supply or any other terms).
3. This means that uptake of our fibre services relies on Retailers delivering excellent retail service quality (**RSQ**) to fibre consumers, which is why RSQ is critically important to us. Our submission on the Commission's *Product Disclosure - Emerging Views Paper* contains more detailed information about our services and the importance of RSQ to us as a wholesaler of fibre services.¹
4. We agree with the Commission that consumers need to know what level of customer service they can expect before choosing a Retailer, if there is to be any meaningful improvement in outcomes in this area.²
5. We also support the Commission's proposed approach to achieving that goal, being:
 - 5.1. first, to monitor and report on the performance of Retailers in key areas of customer service; and
 - 5.2. second, to publish rankings of the performance of Retailers against one another on the aspects of customer service that matter most to consumers.
6. We think this approach could result in relevant and meaningful information being made available to consumers, allowing for better-informed choices and increased transparency. We also think it could have a positive effect on competition in retail markets for telecommunications services, as Retailers will be incentivised (through the proposed dashboards) to compete more vigorously on delivering quality customer service to consumers in terms of the products, services and level of responsiveness to consumer needs they provide.
7. To ensure there is consistency in the information received for the purposes of the dashboard, we think it appropriate for the Commission to make it mandatory for Retailers to provide the required information.
8. Our feedback on the questions posed by the Commission in the Consultation Paper is included in the attached **Appendix**.

¹ Tuatahi First Fibre Limited, [Submission on Improving Retail Service Quality: Product Disclosure – Emerging Views Paper](#), 7 December 2022.

² Consultation Paper, paragraph x4.

Commission question	Tuatahi response
Overall proposed approach to informing consumer choice and improving customer service levels	
<p>1. 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?</p>	<p>Yes. The Commission’s proposed approach will support the availability of meaningful information to consumers; allowing them to make better-informed choices about the Retailer and the telecommunications service/s they choose. It will incentivise retailers to prioritise improving customer service levels and processes, resulting in better outcomes for consumers. Regularly updating the rankings, and monitoring outcomes (to inform any future intervention), will also contribute to the success of these initiatives.</p>
Monitoring providers’ customer service performance	
<p>2. 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?</p>	<p>Yes. The information the Commission proposes to collect appears to be that which will (when presented in a dashboard) provide consumers with meaningful information in relation to the level of customer service they may expect from Retailers. The Commission will need to work with Retailers to confirm that providing all of the information proposed is feasible (and in what format).</p>
<p>3. 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?</p>	<p>We agree with the Commission’s proposed methodology.</p>
<p>4. Can you produce the industry information using the proposed calculation methodology set out in Attachment A without incurring signification costs? If not, why not?</p>	<p>N/A (to Tuatahi)</p>
<p>5. 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?</p>	<p>Maintaining consistency across Retailers is critical to the success of this initiative.</p>
<p>6. Can you provide the industry-sourced information on a quarterly basis? If not, why?</p>	<p>N/A (to Tuatahi)</p>

7. Can you provide the industry-sourced information for residential and SME customers separately?	N/A (to Tuatahi)
8. 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 think the Commission’s initiative will be achieved by making the disclosure of this information mandatory for Retailers because there is no natural incentive for Retailers to provide this information, particularly if their competitors do not voluntarily participate in this initiative.
Publishing provider customer service rankings	
9. 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)?	To provide consumers with visibility of the information, the dashboards must be prominently displayed on an appropriate page of a Retailer’s website. This allows Retailers to update the dashboard more easily and quickly, rather than being required to include the information within printed collateral. Retailers must also be required to provide links to the dashboard in their broadband and mobile marketing collateral.
10. 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?	A six-monthly timeframe balances the need for consumers to have access to current information and the ability for Retailers to collate and disclose the necessary information.
11. We are proposing that provider rankings are calculated using six-month rolling data. Do you agree with this calculation period? If not, what period do you recommend and why?	We agree with the Commission’s proposal.
12. 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?	Yes. Separate rankings need to be maintained for mobile and broadband customers to ensure the results relating to one type of service don’t skew the results relating to the other (which risks undermining the Commission’s objective of making more meaningful information available to consumers). We also think it necessary for the Commission to disaggregate customer service metrics relating to broadband on a technology-basis. This is because there can be significant differences in a Retailer’s customer service relating to (for example) fibre services vs fixed-wireless services.
13. 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?	We think the Commission’s initiative would likely be best-achieved through a statutory information request to ensure consistency of information.

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