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Submission – Telecommunications Act Review: Post-2020 Regulatory Framework for Fixed Line Services

Federated Farmers of New Zealand welcomes the opportunity to comment on the discussion document *Telecommunications Act Review: Post-2020 Regulatory Framework for Fixed Line Services*.

Our primary interest in this proposed framework arises from the suggestion that the Telecommunications Service Obligations (TSO) for Local Residential Telephone Services be amended.

More precisely, the Federation considers this an opportunity to amend the Service Quality Measures in Part II of the TSO for Local Residential Telephone Service. To address ongoing concerns within our membership where farm households and rural businesses continue to suffer landline outages for extended periods.

In the context of this modern era of telecommunications and a growing regulatory emphasis on health and safety, connectivity is key for any family or business. Our members feel that their government should be rigorous in ensuring that communities, however small or remote, of rural New Zealand are not left behind - and where communications problems occur there is some accountability for themselves. This is especially given that such people affected pay their line charges in the expectation of adequate service.

Landline outages affecting communities of people regularly come to our attention as their own attempts for remedies fail to deliver. In many instances, such outages are the result of reliance on obsolete radio technology that is difficult to continue to maintain. Wherever these situations arise, the concern of our people centres around the problems suffered by their farm businesses being unable to contact suppliers and customers, and fear for their families and community should accidents or emergencies occur while the only alternative means of seeking help and assistance is to drive far enough out of the community to reach someone with a working phone.

In this regard Federated Farmers wishes to reference the Service Quality Measures in Part II of the TSO for Local Residential Telephone Service. We are not suggesting that

the team is in a position to provide an immediate fix to these problems, we are however – within the terms of the framework before us – drawing attention to the provisions that seek transparency and accountability from the service provider.

Federated Farmers is concerned that the plight of this part of our membership is lost within the national averages that underpin the Service Quality Measures in the TSO on Local Residential Telephone Service. If it were not for the likely removal of major centres from the TSO under the proposed framework, there would indeed be a very strong case for regional averages to instead underpin the TSO.

What our members need is for it to be understood that there are areas that are very poorly served and that the TSO obligation to provide a landline service is meaningful.

Yours sincerely,

Anders Crofoot
Telecommunications Spokesperson