

I support the proposals in the Feb 2017 "Post-2020 regulatory framework for fixed line services" paper. The proposals given should give a good outcome for consumers and the country as a whole.

In particular, I support:

- Copper deregulated in fibre areas
- Only Chorus fibre regulated, and not LFC fibre
- Chorus copper not included in RAB

I list my points of concern/comments below:

Copper deregulated in fibre areas

- Increasing copper prices will encourage uptake of fibre, this will ensure that the full value of the government's investment in fibre is realized
- This proposal should start now instead of waiting until 2020 to encourage Chorus to roll out fibre faster

Copper withdrawal

- There needs to be people sent out door to door to help elderly and vulnerable people transition to fibre. Maybe government can provide funding for some of the community computer groups to help with providing impartial advice (as opposed to leaving it to telco salespeople).
- Right now, in some cases, it may take a year or two to get fibre installed. Chorus will need to ensure that everyone in an area who has ordered fibre, actually have fibre installed and working, before they can withdraw copper services
- Consents for fibre is currently a problem. It needs to be sorted before copper withdrawal. Once the new law change regarding land access for fibre comes into effect, it should be monitored to ensure it is working properly and everyone who wants to get fibre can get fibre

Copper outside fibre area

- There should be a lower price cap for BUBA services to encourage Chorus to upgrade it to EUBA at least. The prices currently being charged for BUBA is too high especially with its low performance.

Anchor products

- The broadband anchor product should be specified so that it actually provides the headline speed, in light of what nearly happened with DSL.

The specification of the DSL UBA product only requires a minimum throughput of 32kbps. This is below dial up speed. While Chorus has always provided a connection that is above the minimum required speeds, there were concerns a few years ago that Chorus would throttle UBA connections down to the minimum required speed.¹

¹ NBR - Chorus responds to Brislen, IDC "nuclear option" theory
<https://www.nbr.co.nz/article/chorus-responds-brislen-idc-nuclear-option-theory-ck-149759>

To avoid this from happening again, the 100/20Mbps anchor product should be specified so that users can actually see 100/20Mbps speeds all the time (barring exceptional circumstances).

This shouldn't be too hard for Chorus to do as the UFB network is specced for a minimum of 100/50Mbps speed.² In an internal Chorus document, Chorus also admitted that consumers require "an uncongested network"³. This should be put in the regulations to ensure Chorus do what they say.

- In 2020, 100/20Mbps may be too slow to act as an anchor product. In the same document, Chorus suggests an entry broadband product would be 200Mbps in 2020.⁴
- The voice anchor product should require Chorus to provide two options, either by providing it over a voice port on the ONT, or as a low-speed service (128/256k) over a data port. This gives maximum flexibility to RSPs as to which method they use to provide the voice service.

² Network Infrastructure Project Agreement (NIPA) 24 May 2011 p.99
<https://www.crownfibre.govt.nz/wp-content/uploads/2011/12/Network-Infrastructure-Project-Agreement-NIPA-24-May-2011.pdf>

³ Chorus Future Commercial Fibre Broadband Services p.7
<https://customer.chorus.co.nz/file/74151/Chorus-plans-for-2020.pdf> (login required)

⁴ *ibid.*, p8