

Message

From: John Gandy [John.Gandy@comcom.govt.nz]
Sent: 10/07/2023 10:36:18 a.m.
To: Trish Cleland [Trish.Cleland2@comcom.govt.nz]
Subject: Re: Commerce Commission - Draft Information Request - Rural Connectivity Study

Thank you 😊



John Gandy (he/his) (Currently working at home)

Chief Adviser

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From: Trish Cleland <Trish.Cleland2@comcom.govt.nz>
Date: Monday, 10 July 2023 at 10:35
To: John Gandy <John.Gandy@comcom.govt.nz>
Subject: FW: Commerce Commission - Draft Information Request - Rural Connectivity Study

Should have copied you in, but wanted to help you have a break 😊

Ngā mihi nui,
 Trish

From: [REDACTED]@vector.co.nz
Sent: Monday, July 10, 2023 10:34 AM
To: Trish Cleland <Trish.Cleland2@comcom.govt.nz>
Subject: RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Thanks Trish – I'll reach out to the Fibre team here and get back to you with possible times on Monday.

I'll also see if they have specific questions in the meantime.

Many thanks
 [REDACTED]

From: Trish Cleland <Trish.Cleland2@comcom.govt.nz>
Sent: Monday, 10 July 2023 10:26 AM
To: [REDACTED]@vector.co.nz
Subject: RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Morning [REDACTED], unfortunately, our Technical Lead has taken leave this week. I could schedule a session for next Monday? If you can share specific questions/constraints, in the meantime, I may be able to answer these based on questions we have already answered for other providers.

Ngā mihi nui,
 Trish

From: [REDACTED] <[REDACTED]@vector.co.nz>
Sent: Monday, July 10, 2023 9:55 AM
To: Trish Cleland <Trish.Cleland2@comcom.govt.nz>; Kate Robinson <Kate.Robinson2@comcom.govt.nz>
Cc: Vishu Chahal <Vishu.Chahal@comcom.govt.nz>; Market Regulation <market.regulation@comcom.govt.nz>; [REDACTED] <[REDACTED]@vector.co.nz>; John Gandy <John.Gandy@comcom.govt.nz>
Subject: RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID363497]

Kia ora Trish,

If possible we would like to take you up on the offer of discussing with your technical lead.

What days and times this week are they available?

Thanks in advance,
[REDACTED]

From: Trish Cleland <Trish.Cleland2@comcom.govt.nz>
Sent: Friday, 7 July 2023 11:09 AM
To: [REDACTED] <[REDACTED]@vector.co.nz>; Kate Robinson <Kate.Robinson2@comcom.govt.nz>
Cc: Vishu Chahal <Vishu.Chahal@comcom.govt.nz>; Market Regulation <market.regulation@comcom.govt.nz>; [REDACTED] <[REDACTED]@vector.co.nz>; John Gandy <John.Gandy@comcom.govt.nz>
Subject: RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID363497]

Good morning [REDACTED] – that is no problem to have extra time to submit the sample data. We are preparing the final data request, so it would be useful to have by next Friday. Even if it comes after that, we would rather have late than not at all.

Kind regards,
Trish

From: [REDACTED] <[REDACTED]@vector.co.nz>
Sent: Friday, July 7, 2023 9:42 AM
To: Kate Robinson <Kate.Robinson2@comcom.govt.nz>
Cc: Vishu Chahal <Vishu.Chahal@comcom.govt.nz>; Market Regulation <market.regulation@comcom.govt.nz>; [REDACTED] <[REDACTED]@vector.co.nz>; John Gandy <John.Gandy@comcom.govt.nz>; Trish Cleland <Trish.Cleland2@comcom.govt.nz>
Subject: RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Some people who received this message don't often get email from susannah.garwell@vector.co.nz. [Learn why this is important](#)

Morning Kate,

Thanks for the reply – we might need at least a week's extension to provide the data. How late is possible to not interfere with your timeline?

We will have chat internally and come back to you if a discussion with your technical lead is needed.

Thank you,
[REDACTED]

From: Kate Robinson <Kate.Robinson2@comcom.govt.nz>
Sent: Friday, 7 July 2023 9:09 AM
To: [REDACTED] <[REDACTED]@vector.co.nz>
Cc: Vishu Chahal <Vishu.Chahal@comcom.govt.nz>; Market Regulation <market.regulation@comcom.govt.nz>;

[REDACTED] <[\[REDACTED\]@vector.co.nz](mailto:[REDACTED]@vector.co.nz)>; John Gandy <John.Gandy@comcom.govt.nz>; Trish Cleland <Trish.Cleland2@comcom.govt.nz>

Subject: RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Good morning [REDACTED]

Thanks for your email.

Although it is called the Rural Connectivity Study, and that is where our focus is, this means our data collection is not rural only, but is for all land parcels in the country. This means that the info request will apply to Vector. If you'd like to have a chat about this, happy to arrange with our technical lead – please just let me know.

Thanks
Kate



Kate Robinson
Project Coordinator, Market Regulation
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www.comcom.govt.nz

From: [REDACTED] <[\[REDACTED\]@vector.co.nz](mailto:[REDACTED]@vector.co.nz)>

Sent: Wednesday, July 5, 2023 2:32 PM

To: Kate Robinson <Kate.Robinson2@comcom.govt.nz>

Cc: Vishu Chahal <Vishu.Chahal@comcom.govt.nz>; Market Regulation <market.regulation@comcom.govt.nz>; [REDACTED] <[\[REDACTED\]@vector.co.nz](mailto:[REDACTED]@vector.co.nz)>

Subject: FW: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Kia ora Kate,

Hope you are well.

We have had a chat internally about this draft information request and we don't believe Vector Fibre has anything to add to this study and would like confirmation that we do not need to submit anything.

The reasons are as follows:

- In the terms of reference point 1 it states 'The study will establish a baseline view of telecommunications services in areas where fibre is not available (for convenience, we call these 'rural areas'). Please note Vector Fibre is an Auckland based Fibre network so the above does not apply to us.
- In the Terms of Reference point 2 it states 'The purpose of the study is to build a comprehensive picture of the connectivity options for rural end-users of telecommunication services, including the alternatives to copper in rural areas such as wireless broadband services, low earth orbiting (LEO) satellite services and mobile services. 2 This will enable us, over time, to strengthen and improve the detail of our routine monitoring of rural connectivity and end-user experience.' As per the above point, Vector Fibre does not offer these services to our customers – the market we serve is B2B and Fibre only so again this does not apply to us.
- Also noted is the definition that 'rural areas' are those parts of the country where UFB is **not available**, i.e. Areas that have not been designated as Specified Fibre Areas (SFA) (defined as a telecommunications service of the kind that enables access to, and interconnection with, a regulated service provider's fibre network). This

is the environment which Vector Fibre operates in – our services would also be in the SFAs only and not in rural areas.

- There is also a note below which states 'We are also conscious that collecting this new data ties into the annual monitoring data we collect each year. The 2022 Annual Monitoring Report, recently released, included a rural chapter for the first time...' Please note, Vector Fibre does not contribute to this annual monitoring data or receives this Annual Monitoring Report to my knowledge.

It would be great to hear back from you to confirm either way. Please let us know if you would like to discuss also.

Many thanks

From: Kate Robinson <Kate.Robinson2@comcom.govt.nz>

Sent: Thursday, 29 June 2023 4:47 PM

Subject: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Good afternoon,

You may be aware, we are conducting our Rural Connectivity Study under 9a of the Telecommunications Act 2001, the details of which have been published in the Terms of Reference [here](#).

After some initial consultation with the sector, we are pleased with the general support for the Study based on the proposed dataset and the value this will provide.

We've listened to feedback in relation to sensitivity of some of the data being sought. We want to provide assurance that the way we use the data to inform our study will be aggregated, and no individual customer information will be released – including to government departments.

We are also conscious that collecting this new data ties into the annual monitoring data we collect each year. The 2022 Annual Monitoring Report, recently released, included a rural chapter for the first time, which we think helps tell an important story about rural connectivity in New Zealand. The gaps identified in this chapter are what we seek to fill in with the more granular detail, and this will allow us to differentiate between urban and rural areas, building a more complete picture about rural connectivity in NZ.

For this year's Industry Questionnaire, we are combining the data requests for the standard Annual Industry Questionnaire and the Rural Connectivity Study and will split the request as follows:

- We will ask for connections and customer information, as a data file first, as part of this information request. This will allow us to complete more detailed analysis for the Annual Monitoring Report.
- We will then issue our Annual Industry Questionnaire, and it will only request information we have not already collected, such as revenue.

By combining the two data requests, this will also ensure that we are not duplicating information requests as common information can be collected at the same time. We hope that this will reduce the burden on the suppliers of this information. We also believe that by asking for more granular data for the Annual Monitoring Report, more of the analysis currently completed by suppliers can be done by the Commission.

We understand that there may be constraints around the data that we are seeking to inform this study. We have started with our 'ideal set' and will consider constraints, effort required and alternative ways of getting the same / similar information where appropriate, based on the priority of the data elements. The draft information request is [attached](#) and we request any feedback in writing by **10 July 2023**. We will issue the final information request following consideration of the feedback received.

You will also see in the draft request that we would like you to send a sample data file of 5 records to us before **10 July**. Information on how to do this is attached for your reference. We have deliberately left this 'open' in terms of how you collate and submit the data as different providers may have different preferences on how to share some data points and we are open to that. This can be specified in the file you submit. We understand that confidentiality is paramount and the submission process will reflect that.

We are proposing to allow 4 weeks for the submission of the data requested in the information requests and will take feedback on this allowance.

Finally, if you would like to meet (online) to understand more about the study and/or discuss the data being requested, please contact Trish Cleland (trish.cleland2@comcom.govt.nz) who can arrange a session.

Kind regards
Trish



Trish Cleland

Project Manager

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