

## Message

**From:** John Gandy [John.Gandy@comcom.govt.nz]  
**Sent:** 3/07/2023 2:29:32 p.m.  
**To:** Kate Robinson [Kate.Robinson2@comcom.govt.nz]; Trish Cleland [Trish.Cleland2@comcom.govt.nz]; Magdalena Garafova [Magdalena.Garafova2@comcom.govt.nz]; Jordan Hamilton [Jordan.Hamilton@comcom.govt.nz]  
**Subject:** Re: Commerce Commission - Draft Information Request - Rural Connectivity Study

Most of the data they supply will be for Part 6 ID. So Ronin Meaclem will know who to ask. If they give us GIS data, I'm pretty sure Martin will know as well.

J



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

**Chief Adviser**

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[www.comcom.govt.nz](http://www.comcom.govt.nz)

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**From:** Kate Robinson <Kate.Robinson2@comcom.govt.nz>  
**Date:** Monday, 3 July 2023 at 14:28  
**To:** John Gandy <John.Gandy@comcom.govt.nz>, Trish Cleland <Trish.Cleland2@comcom.govt.nz>, Magdalena Garafova <Magdalena.Garafova2@comcom.govt.nz>, Jordan Hamilton <Jordan.Hamilton@comcom.govt.nz>  
**Subject:** RE: Commerce Commission - Draft Information Request - Rural Connectivity Study

Thanks John, I've sent to Martin. In response to Hiramai's other question – who will know the last date they provided us with GIS data?

Kate



Kate Robinson  
 Project Coordinator, Market Regulation  
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 44 The Terrace | PO Box 2351 | Wellington 6140 | New Zealand  
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[www.comcom.govt.nz](http://www.comcom.govt.nz)

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**From:** John Gandy <John.Gandy@comcom.govt.nz>  
**Sent:** Monday, July 3, 2023 1:20 PM  
**To:** Kate Robinson <Kate.Robinson2@comcom.govt.nz>; Trish Cleland <Trish.Cleland2@comcom.govt.nz>; Magdalena Garafova <Magdalena.Garafova2@comcom.govt.nz>; Jordan Hamilton <Jordan.Hamilton@comcom.govt.nz>  
**Subject:** Re: Commerce Commission - Draft Information Request - Rural Connectivity Study

Martin is the only one who will have the software to look at this, so yes please Kate



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

**Chief Adviser**

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**From:** Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>

**Date:** Monday, 3 July 2023 at 13:13

**To:** John Gandy <[John.Gandy@comcom.govt.nz](mailto:John.Gandy@comcom.govt.nz)>, Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>, Magdalena Garafova <[Magdalena.Garafova2@comcom.govt.nz](mailto:Magdalena.Garafova2@comcom.govt.nz)>, Jordan Hamilton <[Jordan.Hamilton@comcom.govt.nz](mailto:Jordan.Hamilton@comcom.govt.nz)>

**Subject:** RE: Commerce Commission - Draft Information Request - Rural Connectivity Study

No – we need to send to Martin R. Happy for me to do this?



Kate Robinson

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**From:** John Gandy <[John.Gandy@comcom.govt.nz](mailto:John.Gandy@comcom.govt.nz)>

**Sent:** Monday, July 3, 2023 12:38 PM

**To:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>; Magdalena Garafova <[Magdalena.Garafova2@comcom.govt.nz](mailto:Magdalena.Garafova2@comcom.govt.nz)>; Jordan Hamilton <[Jordan.Hamilton@comcom.govt.nz](mailto:Jordan.Hamilton@comcom.govt.nz)>

**Cc:** Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>

**Subject:** Re: Commerce Commission - Draft Information Request - Rural Connectivity Study

No, I have nothing that will open this. Anybody else?

J

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**From:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>

**Sent:** Monday, July 3, 2023 11:48:10 AM

**To:** Magdalena Garafova <[Magdalena.Garafova2@comcom.govt.nz](mailto:Magdalena.Garafova2@comcom.govt.nz)>; Jordan Hamilton <[Jordan.Hamilton@comcom.govt.nz](mailto:Jordan.Hamilton@comcom.govt.nz)>

**Cc:** John Gandy <[John.Gandy@comcom.govt.nz](mailto:John.Gandy@comcom.govt.nz)>; Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>

**Subject:** FW: Commerce Commission - Draft Information Request - Rural Connectivity Study

Hi Mags / Jordan – is this a data file that you can open / examine? Kate and John are catching up with Tuatahi at 1pm.

Ngā mihi nui,  
 Trish

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**From:** Hiramai Rogers <[hiramai.rogers@tuatahifibre.co.nz](mailto:hiramai.rogers@tuatahifibre.co.nz)>  
**Sent:** Monday, July 3, 2023 10:38 AM  
**To:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>  
**Cc:** Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>  
**Subject:** RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Morena Trish and Kate

Ahead of our call today, please find attached a sample from our GIS data. If the form and content of that data is acceptable to the Commission:

I understand our current reporting to the Commission includes our GIS data showing the availability of fibre in specific geographic locations

if the Commission can please confirm the last date we provide our GIS data, we can put together an update from that data to who where we have extended our fibre network since that date to now

Moving forward, it would be good to understand if this reporting is something the Commission is going to ask us to do in addition to the current reporting requirements; and, if so, how often the Commission will be seeking these updates?

Also, I know that the explanatory information provided invites us to share our views, and it would be helpful to get an understanding about what specific matters you would like us to focus on (e.g. rural fibre deployment and provisioning constraints (controls) and cost barriers)?

I look forward to talking with you shortly.

ka kite  
Hiramai

**Hiramai Rogers** | Chief Legal & Regulatory Officer | M +64 (27) 7033653

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**From:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>  
**Sent:** Thursday, June 29, 2023 2:43 PM  
**To:** Hiramai Rogers <[hiramai.rogers@tuatahifibre.co.nz](mailto:hiramai.rogers@tuatahifibre.co.nz)>  
**Cc:** Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>  
**Subject:** RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Good afternoon Hiramai,

I realise I never responded to your question below. We are ok with the scope of that data (e.g. completed network only).

Kind regards  
Trish

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**From:** Hiramai Rogers <[hiramai.rogers@tuatahifibre.co.nz](mailto:hiramai.rogers@tuatahifibre.co.nz)>  
**Sent:** Monday, June 26, 2023 1:25 PM  
**To:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>  
**Cc:** John Gandy <[John.Gandy@comcom.govt.nz](mailto:John.Gandy@comcom.govt.nz)>; Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>; Ben Oakley <[Ben.Oakley@comcom.govt.nz](mailto:Ben.Oakley@comcom.govt.nz)>  
**Subject:** RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]



You don't often get email from [hiramai.rogers@tuatahifibre.co.nz](mailto:hiramai.rogers@tuatahifibre.co.nz). [Learn why this is important](#)

kia ora Trish

Our team is putting together a sample set of data to share with you. They have noted that our GIS data currently only records completed network, and does not include future planned network (eg network we have planned to build, or have entered into an agreement with a third party (developer) to build per a scheduled build contract). We just want to be sure the Commission is ok with the scope of that data?

ka kite  
Hiramai

**Hiramai Rogers** | Chief Legal & Regulatory Officer | M +64 (27) 7033653

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**From:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>  
**Sent:** Sunday, June 25, 2023 9:56 AM  
**To:** Hiramai Rogers <[hiramai.rogers@tuatahifibre.co.nz](mailto:hiramai.rogers@tuatahifibre.co.nz)>  
**Cc:** John Gandy <[John.Gandy@comcom.govt.nz](mailto:John.Gandy@comcom.govt.nz)>; Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>; Ben Oakley <[Ben.Oakley@comcom.govt.nz](mailto:Ben.Oakley@comcom.govt.nz)>  
**Subject:** RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

Thank you for your reply Hiramai, and your offer of involvement and support for the study. We can shift the session on Monday, 3 July to 1pm, that is no problem. I'll send through the request now.

Ngā mihi nui,  
Trish

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**From:** Hiramai Rogers <[hiramai.rogers@tuatahifibre.co.nz](mailto:hiramai.rogers@tuatahifibre.co.nz)>  
**Sent:** Friday, June 23, 2023 4:46 PM  
**To:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>  
**Cc:** John Gandy <[John.Gandy@comcom.govt.nz](mailto:John.Gandy@comcom.govt.nz)>; Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>  
**Subject:** RE: Commerce Commission - Draft Information Request - Rural Connectivity Study [CCNZ-IMANAGE.FID358011]

kia ora Trish, John and Kate

Tuatahi was aware of the Rural Connectivity Study, and are very keen to be involved and support the Commission on this project. We are very interested to know about the purpose of this study, in terms of the outcomes the Commission intends to deliver (including any recommendations in terms of regulatory settings, roll-out methodologies, etc.). We have a lot of experience in rural areas and dealing with existing (third-party owned) infrastructure assets (particularly electricity poles) to extend fibre, which presents a range of risks and overheads depending on the condition and ability of those infrastructure assets to be used for a shared purpose. We will be happy to share those experiences with the Commission if it will help to form a more complete overview.

In the meantime, I will circulate the data request to our Team now and ask them to confirm they can meet the 3 July timeframe, and how quickly we can provide you with sample data file of 5 records.

Is there any way we can schedule our call on Monday, 3 July to 1pm? I have a pre-arranged meeting at 2pm that will be difficult to move, but not impossible if you are unable to meet earlier.

Please also extend my thanks to Ben for getting back to me on this so quickly.

ka kite  
Hiramai



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**From:** Trish Cleland <[Trish.Cleland2@comcom.govt.nz](mailto:Trish.Cleland2@comcom.govt.nz)>

**Sent:** Thursday, June 22, 2023 1:02 PM

**To:** Hiramai Rogers <[hiramai.rogers@tuatahifibre.co.nz](mailto:hiramai.rogers@tuatahifibre.co.nz)>

**Cc:** John Gandy <[John.Gandy@comcom.govt.nz](mailto:John.Gandy@comcom.govt.nz)>; Kate Robinson <[Kate.Robinson2@comcom.govt.nz](mailto:Kate.Robinson2@comcom.govt.nz)>

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

Good afternoon,

As 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 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. Should there be an OIA request, we would not release anything without talking to the source of the information first.

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. The draft information request is attached and we request any feedback in writing by **3 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 3 July. Information on how to do this will be shared in due course. 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.

**We also invite you to meet with us to discuss this in person (over teams). I have held the Monday, 3 July from 2pm to 3pm and if this day/time suits, will forward on the MS Teams request.** If this will not work for you, please suggest an alternative day/time. If you do not feel a meeting is necessary, please advise and I will release the hold from diaries on our side.

Kind regards,



**Trish Cleland**

**Project Manager**

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