

Submission into TSO regulatory framework.

Thank you for the opportunity to comment on the current TSO outcomes from a rural perspective. Let me point out initially I live in Rural Taranaki approx 50kms from New Plymouth and approx 10 km from the STOS (Maui) onshore production station at Oaonui. Coincidentally the microwave transmitter sites and the Telecom and Vodafone cell phone service towers for coastal Taranaki are adjacent to my farm property.

I am operating a 500cow dairy farm as well as a small beef breeding operation on this property, and have been gradually enhancing my operation since 1990. This has increased my requirements for IT services, due to the difficulty of maintaining staffing levels, and thus attempting to apply technological solutions instead. My current staff have had difficulty keeping their phone operative for the 5 years that have worked for me. Despite having family overseas and the desire to keep in contact via the internet, they have in utter frustration recently discontinued their internet account.

Accordingly I have some issues with the current TSO outcomes.

It appears that Telecom has and continues to hide behind its obligation to supply only a voice phone capable service to rural areas of Taranaki. It is very common to have a fax transmission fail due to connection (quality) failure. I would submit that despite numerous complaints and service calls the line remains extremely noisy and impossible for internet use after any significant rain. As an example this morning I downloaded my e-mails (9 in total 1 @ 700kb the rest smaller than 200kb) which took approx 2.5 hours connection time due to being repeatedly disconnected.

The failure to repair let alone upgrade the system for such problems shows Telecom's disdain to paying any more than lip service to the issue. Hardly a fair and equitable distribution of the service I would suggest, let alone timely or fair.

It would make sense to make the TSO an itemised portion of the telecom service as currently Telecom ignores the larger cost areas, which given the relative pricing of the service is galling.

Is there not a need looking forward to ensure that a reliable system is more important than a feature laden system. Most users looking for the special features would be prepared to pay extra for them, but there is no sense in having the flashiest system if large portions of the country cannot access them. How much has been spent on the rural infrastructure, if one excludes maintenance, I suspect that rural dwellers are suffering the same problems as in the rating system ie lions share of the cost and mouses portion of the product. Rural phone services need to be reliable or the emergency functions may even become unavailable. It is interesting to note that in Australia (Victoria specifically) that rural areas are supplied with the same level of service by Government requirement. Whilst that is unworkable for some of the remote areas some strategic spending in rural areas given their net contribution to the economy could hardly be regarded as excessive.

Should supplying a reasonable level of service to rural dwellers require a subsidy, it would be a fair assumption that given the relative contribution to GDP, assisted enhancement of service to a reasonable minimum standard given the future compliance issues and data/ monitoring transfer requirements which seem to be growing daily, will make such upgrades a necessity.

Much is made of the role of the commerce commission to oversee the TSO structure, would it perhaps be timely for the commission to examine the current charging structure which is based on volume of data transferred for most users yet for dial up users is based on time. So should there be a disconnection due to a line fault a subscriber is paying repeatedly to attempt down loads. Given that the connection issue are acknowledged by Telecom shouldn't they be offering some concessional pricing to those affected. Perhaps the commerce commission should be forcing that as a minimum first step to prompt the repairs and upgrades to the poorly served areas.

I stress the need for careful consideration of equitable changes and requirements for telecom services. I recently contributed to the review of the building act which eventually created a raft of requirements and regulations, enforced by a raft of bureaucrats (generally territorial authorities) at great cost to all those involved, with the unfortunate result in hugely inflated costs and paper works but still minimal accountability by those who are setting the standards. A paper trail is useful to examine why things go wrong but it would surely make more sense to avoid things failing in the first place. There need to be a clear intent and direction but it need to be practical and affordable.