

27 July 2022

To:  
Ministry of Business, Innovation and Employment  
Wellington

By email: [communicationspolicy@mbie.govt.nz](mailto:communicationspolicy@mbie.govt.nz).



Dear Nicola

Thank you for the opportunity to comment on the working draft of the Government's strategy 'Lifting Connectivity in Aotearoa: Government Statement of Intent for Improving Digital Connectivity' (the Strategy).

This letter of response is not a formal submission made on behalf of our members. Due to the time available to consider the strategy the following sets out some high-level observations only. Our members will provide their own individual responses.

The TCF looks forward to further engagement with MBIE as these draft ideas are developed into a more robust strategy.

Overall, we agree with the goals and objectives described in the strategy as they support the Government's policy that improved connectivity is critical to improving economic productivity, New Zealand's global competitiveness and the lives and wellbeing of New Zealanders.

The strategy sets out a view in the short-term focused on particular technologies and rural connectivity but perhaps it needs to aim higher and look further to the future. We may need to reinterpret what connectivity means to New Zealanders in ten years and what will enable the new technologies and innovative solutions coming down the pipeline.

#### **Four Priorities**

##### *Growing the economy through better connectivity*

It would be helpful to link the four priorities described in the Strategy with the 'broader priorities and other work programmes across government' more explicitly. Reading the Strategy from a private sector perspective it would enable a more fulsome view of how the Strategy fits into the Government's wider digital strategy. For example, topics such as cybersecurity, consumer data right and consumer protection were not covered in any detail in the Strategy but could have been explained in the document in a way that pointed to the specific projects underway in this area by the various Government agencies. By understanding how this Strategy fits into the broader policy landscape will provide a better understanding of how "Lifting Connectivity" will deliver better outcomes for all New Zealanders.

##### *Improving the rural connectivity experience to be at least as good as that enabled by 4G*

The focus of the Strategy on rural connectivity sits within the current programme of work across the Sector but it doesn't identify how future technologies and services may deliver technology-based solutions to enable rural communities beyond the next five years. Focusing on the performance of existing technologies may not drive the right outcomes.

Improving rural connectivity can't be delivered by one silver bullet technology. There has to be consideration given to delivering a range of technologies that will best suit a community.

It would be better to focus on a speed or on a capability rather than comparing with a particular technology. "At least as good as that enabled by 4G" is quite imprecise as user experience on mobile services varies hugely.

*Supporting New Zealand's climate change goals*

The Government needs to consult with the sector on how telecommunications can support New Zealand's climate change goals. This area requires further consideration and the development of a sector-wide strategy. Telecommunications can take the place of long-distance travel and, as we have seen during the COVID lockdowns, remove the need for daily commuting, central city offices and all that entails.

*Facilitating a more inclusive Aotearoa New Zealand*

There is a role for government to support the private sector to enable suitable infrastructure to be built in areas where it would otherwise be uneconomic. To connect all communities reduces digital inequities and enables those consumers who stand to benefit the most from digital inclusion to take part. What that partnership looks like will be critical. Consultation with the telecommunications sector on investment plans and a resilient network will be important.

The TCF is currently working with MBIE on telecommunications resiliency. There is a balance between investment and the appropriate levels of resiliency dependent to location, level of risk and cost. Further consideration needs to be given to the proposed measures for objective D and what future resilience standards will require.

Ensuring regulatory settings are right to improve connectivity is important but we also need to ensure innovation and solution-driven outcomes are encouraged. Working with the sector to identify and remove non-regulatory barriers to the provision of infrastructure is welcomed as is the opportunity to review existing laws and regulations that are no longer fit for purpose.

Past projects of this type have suffered from not keeping pace with the technologies on offer. It's vital that we build a programme of work that supports customer expectations as they will be when the project deploys, not as they are today. What is seen as "high speed" today will rapidly become entry level and we should ensure we are delivering a capability that makes sense for 2032, not 2022.

I look forward to further engagement with MBIE on how these developing the detailed next steps required to deliver the objectives and the overall connectivity strategy.

Yours sincerely



**Paul Brislen**

Chief Executive Officer

New Zealand Telecommunications Forum (TCF)