



## **TCF submission on Going for Growth**

**April 2025**

### **Introduction**

1. Thank you for the opportunity to provide feedback on the [Going for Growth](#) strategy. This feedback is provided on behalf of the New Zealand Telecommunications Forum (TCF).
2. The TCF is the telecommunications sector's industry body which plays a vital role in bringing together the telecommunications industry and key stakeholders to resolve regulatory, technical and policy issues for the benefit of the sector and consumers. TCF member companies represent 95 percent of New Zealand telecommunications customers. Our members include network operators, retail service providers and the tower companies that own and operate cell towers.
3. Our comments focus on:
  - a. The vital role that telecommunications plays as an enabler of economic growth. This is not currently referenced in Going for Growth and we recommend it be included in the next iteration.
  - b. The administrative burdens that make it harder for businesses to innovate and grow.

### **Telecommunications as an enabler of economic growth**

4. Telecommunications<sup>1</sup> is critical infrastructure and an enabler of economic growth. There would be no economy without telecommunications.
5. The services that telecommunications companies provide - be it internet access, mobile services or data storage - increase productivity, enable collaboration and innovation, optimise logistics and supply chains, enable payment systems to operate, enhance market

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<sup>1</sup> Telecommunications refers to the transmission of information over a distance using various electronic and wireless technologies such as mobile communication networks, fixed-line telephony, fibre optic cables, and satellite. Telecommunications provides the infrastructure and networks for internet services. The New Zealand telecommunication sector includes network operators (fixed line and mobile), retail service providers, tower companies and satellite participants.

reach and facilitate global trade across all sectors of the economy. Without telecommunications most if not all businesses would cease to operate. Services in the education, health and government sectors would be significantly affected.

6. Numerous studies have shown that widespread availability and reliable operation of telecommunications networks are critical to a country's economic competitiveness and its ability to participate in the global market place<sup>2</sup>. Studies also show that investments in telecommunications infrastructure have a direct and significant impact on GDP.
7. In New Zealand successive governments have co-invested in telecommunications infrastructure (e.g. through the UFB roll out and the Rural Connectivity Group), with the express intention that connectivity improvements will be leveraged by businesses and grow weightless exports. World class connectivity has enabled growth for sectors such as digital animation, gaming and screen. In a [recent press release](#) Minister Goldsmith noted that "reliable and high-quality digital connectivity networks improve productivity and are essential to growing our economy and easing the cost of living".
8. With data consumption and customer expectations growing rapidly, the sector is continuously upgrading and investing in networks, spending around \$1.61 billion per year<sup>3</sup>. Recent investments in 5G have paved the way for applications in areas such as IoT, agritech and smart logistics. A [recent report](#)<sup>4</sup> found that investment in fibre infrastructure delivered an estimated \$31 billion of economic benefit between 2011 and 2023, with ongoing investment in the fibre network anticipated to continue enhancing the nation's digital capabilities. The Commerce Commission has recently approved \$1.7 billion in Chorus expenditure over the next four years.
9. In addition to improving the competitiveness of other sectors, the sector is itself an important contributor to New Zealand GDP ( 1.56 percent of GDP/ \$360.3 billion<sup>5</sup>).
10. Going for Growth has missed an opportunity in not considering telecommunications as an enabler of the outcomes the Government is seeking to achieve. This is especially the case for the following pillars:
  - a. *Innovation, technology and science*. High speed internet, mobile technologies and cloud computing remove barriers to entry, and can be used to develop innovative

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<sup>2</sup> [\(PDF\) Impact of Telecommunications on Global Economic Development](#)

[Unleashing fibre - Deloitte New Zealand](#)

[https://www.2degrees.nz/sites/default/files/2025-03/Productivity\\_Propelled-Accelerating\\_technology\\_adoption\\_and\\_innovation\\_in\\_New\\_Zealand\\_report.pdf](https://www.2degrees.nz/sites/default/files/2025-03/Productivity_Propelled-Accelerating_technology_adoption_and_innovation_in_New_Zealand_report.pdf)

<sup>3</sup> [2023 Telecommunications Monitoring Report Pūrongo Aroturuki Torotoro Waea 2023](#)

<sup>4</sup> See page 7 and page 13.

<sup>5</sup> Source: Ministry of Business, Innovation and Employment, March 2025.

products and services. Without these foundations there is no digital technology sector or AI strategy.

- b. *Developing talent.* Telecommunications infrastructure enables access to information and learning resources which are essential for upskilling local talent. Our networks enable access to learning platforms and facilitate remote learning.
- c. *Promoting global trade and investment.* Telecommunications technologies facilitate global trade by enabling cross-border transactions, efficient supply chain management, and new business models. [Digital nomads](#), the recently introduced visa category, would not be possible without telecommunications.
- d. *Infrastructure for growth.* Going for Growth notes that investment in infrastructure will enable New Zealand to attract modern manufacturing and support the use of innovative technologies such as the powering of data centres for AI. Renewable energy is referenced as an enabler. Telecommunications is also critical, but not mentioned.

11. We recommend that the next iteration of Going for Growth refers to telecommunications as a key enabler of economic growth.

#### **Over-burdensome regulation**

12. The telecommunications sector agrees that poorly designed and over-burdensome regulation undermines investment and innovation and makes it harder to compete.
13. Regulation needs to be regularly reviewed to ensure it remains fit for purpose and is not unjustifiably limiting competition and innovation. Where it is found to be unfit for purpose or no-longer justified, it must be amended or removed. We are engaging with the Government on issues that fall into this category, but progress cannot be made if sufficient resources are not available to prioritise the issues. If removing administrative burdens is a priority it needs to be adequately resourced across the public sector.
14. If there are questions about this submission please contact [kim.connolly-stone@tcf.org.nz](mailto:kim.connolly-stone@tcf.org.nz) in the first instance.

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