

Dr Parmjeet Parmar  
Chairperson  
Economic, Science and Innovation Committee

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## The Telecommunications Amendment Bill

Thank you for your time this morning. I am writing now because some of the other speakers have raised matters that require some further comment from ISPANZ.

### **WombatNET**

WombatNET is a member of ISPANZ. We strongly support their submission. The speaker raised very good points about access to capital and about the resilience that having diverse provision of telecommunications services, especially to rural areas, provides.

I would encourage you to re-read the WombatNET submission and to find a way to amend this Bill to give effect to its recommendations.

### **Dispute Resolution Schemes**

We fundamentally disagree with the assertion made by the speaker from Utilities Disputes that smaller providers will have more disputes and less ability to deal with them effectively. This is the opposite of our members' experience. As I mentioned, some ISPANZ members used to belong to the telecommunications disputes resolution scheme that competes with the one run by Utilities Disputes. They left because they never had any disputes to resolve and membership was expensive.

This Bill is proposing a revenue cap below which ISPs would not have to join a scheme. We believe that this is appropriate. This Bill is the result of extensive consultation by MBIE over a period of years, including debate about the membership costs of dispute resolution schemes. In our discussions with TCF and in our submissions to MBIE we have raised the costs of scheme membership. We have been consistent in our position

that any compulsory scheme should be user pays, so that those with most disputes pay most and those without disputes do not pay for something that they do not use. This is not something that scheme providers are keen on. They want a guaranteed revenue stream regardless of whether or not it imposes unnecessary costs on service providers, costs that must be passed on to end users.

It is understandable that Utilities Disputes is in favour of compulsory scheme membership. They charge a fee for membership, so of course they would be.

We believe that the Utilities Disputes recommendation that scheme membership be compulsory is self-serving. It is not in the best interests of the end users.

Best Regards,



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