

Silvia Zanini

From: Neville - ALARMNZ [Neville@ALARMNZ.com]
Sent: Tuesday, 24 January 2012 11:00 a.m.
To: Silvia Zanini
Subject: RE: Submission on ComComNZ - Technical Issues Paper 1: Dated: 19 December 2011

Hi Silvia

I have fixed up the typo's and cleaned up the language. below is a version of my previous submission that you are welcome to go ahead and publish;

- START

I would like to make a submission to the commerce commission regarding making improvements to this paper Technical Issues Paper 1: Dated: 19 December 2011 in particular;

- 1. The lack of commentary on the high cost required to deploy broadband battery supply (UPS) to support CPE equipment for SME and homes using FTTX, XDSL, xG. This is a huge safety and perhaps TSO issue and this report does not even make a single comment? FYI the projected one off cost to the economy is approx. \$300M and then on-going \$75M annually (based on 1 Million units)**
- 2. The cost on "*Figure 3: Telecom estimation of selected copper to fibre migration costs*" (page 16) security systems is actually \$50M not \$248M and the medical alarm figure is \$30M not \$65M as stated. My figures are likely more accurate as I have been in that industry for 25 years, and I have sponsored the release of a number of Broadband Alarm migration solutions @\$100-500 per device. As the author of one of the most widely used open standard Broadband Alarm transport protocol in both NZ and Australia, so therefore I may have some insight into these matters.**
- 3. No mention of the 18,000 Fire Alarms on "*Figure 3: Telecom estimation of selected copper to fibre migration costs*" (page 16) I estimate \$15-20M.**
- 4. The figure used to explain FAX migration costs on "*Figure 3: Telecom estimation of selected copper to fibre migration costs*" (page 16) is \$100M over estimated !!**

Some of this UPS and legacy device information contained within the Technical issues paper is flawed or missing and no reader should base any policy decision on its contents in the areas of concern mentioned.

Regards
Neville Clifton
Broadband Network Consultant
ALARMNZ.com

- END

From: Silvia Zanini [Silvia.Zanini@comcom.govt.nz]
Sent: Tuesday, 24 January 2012 9:02 a.m.
To: Neville - ALARMNZ
Subject: RE: Submission on ComComNZ - Technical Issues Paper 1: Dated: 19 December 2011

Hi Neville,

We are planning to publish all feedback received on the Commerce Commission website. I am assuming this is okay with you but please let me know if not.

Cheers,
Silvia

From: Neville - ALARMNZ [mailto:Neville@ALARMNZ.com]
Sent: Monday, 16 January 2012 9:24 p.m.
To: telco
Subject: Submission on ComComNZ - Technical Issues Paper 1: Dated: 19 December 2011

Hi

I would like to make a submission to the commission regarding making improvements to this paper in particular;

1. The lack of commentary on the high cost required to deploy broadband battery supply (UPS) to support CPE equipment for SME and homes using FTTH, XDSL, xG. This is a huge safety and perhaps TSO issue and this report does not even make a single comment? FYI the projected one off cost to the economy is approx \$300M and then ongoing \$75M annually (based on 1 Million units)
2. The cost on "*Figure 3: Telecom estimation of selected copper to fibre migration costs*" (page 16) security systems is actually \$50M not \$248M and the medical alarm figure is \$30M not \$65M as stated. My figures are likely more accurate as I have been in that industry for 25 years, and I have sponsored the release of a number of Broadband Alarm migration solutions @\$300-500 per device. As the author of one of the most widely used open standard Broadband Alarm transport protocol in both NZ and Australia, I have some valuable insight into this matter.
3. No mention of the 18,000 Fire Alarms on "*Figure 3: Telecom estimation of selected copper to fibre migration costs*" (page 16) I estimate \$15-20M

4. The figure used to explain FAX migration costs on "*Figure 3: Telecom estimation of selected copper to fibre migration costs*" (page 16) is \$100M over estimated !!

Some of this UPS and legacy device information contained within the Technical issues paper is flawed or missing and no reader should base any policy decision on its contents.

Regards

Neville Clifton
Network Consultant
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