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Study on Demand Side Issues
Commerce Commission
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To whom it may concern:

Submission on the Draft Terms of Reference for the Study on Demand Side Issues

Thank you for the opportunity to make a submission on the Terms of Reference for this study. InternetNZ appreciates the opportunity to make some brief comments.

We commend the Commission for launching this Study. With the looming conclusion of the debate about how to build ultra-fast broadband networks and who should do so, attention will inevitably turn to what they are going to be used for, and how to maximise uptake.

Network providers and their owners (including the Crown) will have a clear interest in maximising uptake, but so will providers of services that require high bandwidth for successful use.

A careful, neutral Study that investigates barriers to uptake is thus both useful, and timely.

In InternetNZ's view, the Terms of Reference are broad enough to encompass all of the issues that could be relevant to understanding barriers to uptake of the UFB. We do not have any particular items to add.

InternetNZ does however wish to suggest to the Commission that an implicit or explicit outcome of the Study might be to establish what barriers there are to the flat-rate or unmetered provision of New Zealand content on the new fibre networks. With the very high speeds they allow, and the lower cost of domestic data, consumers will be looking for accessible content that does not hit artificial limits.

In respect of the Commission's process, we suggest two things:

- **Consider holding an informal workshop or round-table to test initial views arising from the analysis and research phase of the Study before publishing the discussion paper.**

This will allow the Commission to ensure it is on the right track with stakeholder input in a relatively private setting. InternetNZ would be happy to host such an event.

- **Bring the Conference and Final Report forward, or defer them until next year.**

The proposed timing of the Conference and the Report clash with the Rugby World Cup tournament and the General Election. The industry and the public will have their minds on other things. It would be wise to avoid this if possible, if quality public input and serious industry engagement with demand side issues is part of the Commission's objective in doing the study.

If the timing of the Study cannot be accelerated to allow for this (which would be preferable), it would be preferable in our view to defer these two steps until December or beyond.

I am happy to discuss these recommendations with you if that is of assistance.

With many thanks for your consideration,

Yours faithfully

A handwritten signature in black ink that reads "Vikram Kumar". The signature is written in a cursive style and is underlined with a single horizontal stroke.

Vikram Kumar

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