COMMERCE COMMISSION NEW ZEALAND
Te Komihana Tauhokohoko

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2026 Review of the Measuring Broadband New Zealand programme – Minimum scope

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Contents

Associated Documents

Publication date	Title	Link
22 February 2022	2022 Review of the Measuring Broadband New Zealand programme	https://www.comcom.govt.nz/regulated-industries/telecommunications/projects/2022-review-of-the-measuring-broadband-new-zealand-programme/

Glossary

Term	Defined
Act	Telecommunications Act 2001.
ADSL	Asymmetric Digital Subscriber Line (ADSL) – A copper-based broadband technology.
Commission	Commerce Commission.
Consumer	Consumer, in relation to a telecommunications service, means a person who is the ultimate recipient of that service or of another service whose provision is dependent on that service. In this paper, consumer and end-user are used interchangeably.
Customer	Customer, in relation to a telecommunications service, means the person who has purchased the product or service. They might not be the end-user, or consumer, of the product or service.
HFC	Hybrid Fibre Coaxial (HFC) – A fixed broadband technology that uses optical fibre to carry data to neighbourhood nodes, with coaxial cable used for the final connection to homes and businesses.
LFC	Local Fibre Company (LFC) – A company that built and operates fibre networks funded through New Zealand's Ultra-Fast Broadband (UFB) initiative and supplies fibre services to retail providers on a wholesale basis, rather than directly to end-users. Chorus, Tuatahi, Enable and Northpower are LFCs.
LEO Satellite	Low Earth Orbit (LEO) Satellite – A wireless broadband service delivered via low-orbit satellites and ground dishes, offering generally higher speeds across rural and urban areas than traditional rural technologies.
MBNZ	Measuring Broadband New Zealand (MBNZ) – A Commerce Commission programme that independently measures and reports on broadband performance across providers, plans and technologies to help consumers compare options and choose the best service.
MTR	Minimum Testing Requirements (MTR) – The minimum requirements of an MBNZ testing programme that meets our obligations under the Act.
OIA	Official Information Act 1982 (OIA) – New Zealand law that gives the public the right to request and access official information held by government agencies, subject to certain limits.
RSP	Retail Service Provider (RSP) – A retail provider of telecommunications services to the consumer of the service, and who has the billing relationship with the consumer for that service.
RSQ	Retail Service Quality (RSQ) – The Telecommunications Act provides powers to improve retail service quality, including customer service, faults, installation, contracts, product disclosure, billing, switching, service performance, speed and availability.

Term	Defined
TCF	The New Zealand Telecommunications Forum Inc. (TCF) – An industry group established for the purposes of fostering co-operation among telecommunications industry participants to efficiently resolve regulatory, technical and policy issues and which is "the Forum" for the purposes of the Telecommunications Act 2001.
VDSL	Very-high-bit-rate Digital Subscriber Line (VDSL) – A copper-based broadband technology.
WISP	Wireless Internet Service Provider (WISP) – A provider that delivers wireless internet from local towers to home receivers, offering 4G-like speeds suitable for everyday use but with performance affected by location and conditions.

Introduction

Background

1. The Measuring Broadband New Zealand (**MBNZ**) programme monitors and reports on broadband performance across New Zealand. This is a key part of our work under s 9A of the Telecommunications Act 2001 (**the Act**). Under this section we are required to monitor and report on retail service quality in relation to telecommunications services including service performance, speed and reliability.[1]

2. We first began the programme in 2007. Since then, the programme has evolved from selective, network-specific testing to a broad testing programme that assesses multiple technologies and includes an increasing level of end-to-end consumer experience measures.

3. Retail Service Providers (**RSPs**), in alignment with our Broadband Marketing guidelines, are now using the results of the programme in their marketing, giving consumers more accurate information on the likely performance of their services.

4. Changes in technology, consumer expectations, and RSP capability mean it is timely to reassess the programme for its next phase, confirming what broadband performance information should be monitored, how it should be measured, and how results should be reported.

Reviewing the Measuring Broadband New Zealand programme

5. The purpose of this review is to ensure the programme is appropriately right-sized to meet our regulatory requirements and consumer needs for the foreseeable future.

6. We consider that the current programme has achieved a great deal of success against its objectives. However, we are also aware that the current programme is costly and has limitations that present challenges and opportunities for future phases of the programme.

7. We believe that a broadband testing programme is vital to continue to meet our obligations under the Act, and to inform and support consumer choice.

8. This paper sets out our view of the minimum level of broadband testing we believe is required to meet our obligations and the needs of New Zealand consumers going forward. This would form the basis for the next phase of the programme. Our Minimum Testing Requirements (**MTR**) are set out in **Table 1**.

[1] Telecommunications Act 2001, s 9A(1)(f) requires us to make available information about retail service quality in a way that informs consumer choice.

Submissions

9. We welcome your feedback on the MTR and the proposed future shape of the programme. We particularly encourage responses to the consultation questions set out in **Appendix 1**, which are intended to guide feedback on the scope of testing and reporting.

10. We would be grateful for your views on these areas **by 18 August 2026**. Responses can be emailed to telecommunications@comcom.govt.nz with 'MBNZ Programme Review – Minimum Scope submission' in the subject line.

Confidentiality

11. The protection of confidential information is something the Commerce Commission (**Commission**) takes seriously. When including commercially sensitive or confidential information in your submission, we offer the following guidance:

    11.1 please provide a clearly labelled confidential version and public version as we intend to publish all public versions on our website; and

    11.2 the responsibility for ensuring that confidential information is not included in a public version of a submission rests entirely with the party making the submission.

12. Please note that all submissions we receive, including any parts that we do not publish, can be requested under the Official Information Act 1982 (**OIA**). This means we would be required to release material that we do not publish unless good reason existed under the OIA to withhold it. We would normally consult with the party that provided the information before any disclosure is made.

Next steps

13. The submissions received in response to this paper will be published on our website.

14. Following our review of submissions, we will then decide on the future shape of the programme to ensure it is appropriately right-sized to meet our regulatory requirements and consumer needs, in accordance with section 9A of the Act. We will then work on determining the delivery approach, such as independent third-party or RSP-led testing to deliver the programme going forward.

Next steps	Indicative date
Publish *Measuring Broadband New Zealand Programme Review – Minimum scope* paper	July 2026
Publish *Measuring Broadband New Zealand Programme Review – Minimum scope* submissions	August 2026
Publish decision on future shape of the programme	September 2026
Procurement and/or implementation of future programme	October 2026 onwards

15. Please contact Andrew Young (telecommunications@comcom.govt.nz) if you have any questions.

MBNZ programme overview

16. The aim of the MBNZ programme is to ensure consumers have accurate and reliable information about broadband performance to help them choose the best broadband for their household. By providing independent evidence of actual performance, the programme ensures that marketing claims, which consumers use to make decisions, are substantiated and encourages telecommunications providers to compete on performance, not just price.

17. An independent Commission-led programme is viewed as critical by consumers, industry, and the Commission for:

    17.1 consumer trust and credibility;

    17.2 fair comparability across RSPs; and

    17.3 avoiding incentives or perceptions of "gaming" results.

18. The current MBNZ programme measures performance across a range of major RSPs and technologies. This programme initially included copper (Asymmetric Digital Subscriber Line (**ADSL**) and Very-high-bit-rate Digital Subscriber Line (**VDSL**)), Hybrid Fibre Coaxial (**HFC**), Fibre, and 4G Fixed Wireless broadband. Low Earth Orbit (**LEO**) satellite and Wireless Internet Service Provider (**WISP**) Fixed Wireless broadband were both added recently. This has allowed for comparisons across different types of broadband services and different RSPs in the market.

19. Under the current programme, most performance data is collected at the modem using "whiteboxes", devices installed in volunteer households that run automated tests at different times of the day. These devices capture metrics such as speed and reliability, while also providing users with access to their own performance data through an online dashboard. The programme also includes embedded agent testing, currently undertaken by Spark, which uses software embedded in customer modems to collect broadband performance data using the same methodology as the Whitebox programme.

20. The results are compiled by Cisco and published in regular quarterly reports on the Commission's website. These reports support transparency in broadband performance and are used by RSPs in their marketing, as well as informing the Commission's wider monitoring and engagement work in telecommunications markets.

21. The Commission's *Broadband Marketing Guidelines* (published February 2025) build on earlier guidance first set out in the *Marketing alternative telecommunications services during the transition away from copper guidelines* (November 2021).[2,3] These guidelines set expectations that any numerical speed indicator used in marketing should be based on available, reliable, and independently verifiable data, such as MBNZ results. As a result, consumers see peak download speeds of different technologies reflected in marketing when choosing a broadband product. The New Zealand Telecommunications Forum (**TCF**) codified these expectations in the TCF's *Broadband Marketing Code*, endorsed in October 2025.[4]

[2] Commerce Commission, *Broadband Marketing Guidelines 2025*, 20 February 2025.

[3] Commerce Commission, *Marketing alternative telecommunication services during the transition away from copper guidelines*, 8 November 2021.

[4] TCF, *Broadband Marketing Code,* 20 October 2025.

Feedback on the current programme

22. While we believe the programme has been successful in achieving its objectives, we have received feedback from RSPs and consumers around improvements and opportunities for future phases of the programme.

Testing and reporting cadence

23. RSPs have told us that the current quarterly reporting period means that they are having to update their speed claims in marketing materials regularly. RSPs have indicated that this creates a significant regular administrative burden, and that a longer reporting cadence would help reduce this burden.[5]

Technologies tested

24. RSPs also provided views on which technologies should continue to be tested at a detailed provider level. Over the current period of the programme, fibre plans have shown a high degree of consistency between providers. Fibre 100 and Fibre 500 plans are typically overprovisioned by LFCs, meaning consumers, on average, experience speeds in line with the wholesale speed tier. In addition, performance across fibre plans has remained highly consistent over time, with limited variability in results.

25. Some stakeholders have argued that reporting a tested fibre performance figure is no longer necessary, and that presenting a range or relying on wholesale speed tiers would be sufficient for consumers.[6]

[5] While the guidelines require numerical speed claims to be based on the most recent MBNZ data, they do not specify a timeframe within which marketing materials must be updated following the release of new results. RSPs can also use lower speeds than reporting MBNZ speeds.

[6] For Fibre Max, the speed representations would need to take into account the protocol overhead. Fibre Max is derived from a gigabit wholesale product, with protocol overhead reducing maximum observed speeds to approximately 940 Mbps.

Proposed future shape of the MBNZ programme

26. We consider that an ongoing MBNZ programme continues to support the Commission in meeting its obligations under the Act and delivers benefits to consumers and the broader broadband market. To inform the scope and design of the future MBNZ programme, we initially engaged with a selected group of industry participants.

27. We outline the proposed future shape for the next phase of the programme below.

Table 1: Proposed future shape of the MBNZ programme

	Minimum Testing Requirements	Not necessary / Nice to have
Period	• Peak-period results	• Off-peak results
Region	• National	• Rural and urban breakdown
Breakdown	• By RSP for Fixed Wireless • By speed tier for Fibre[7] • By technology for other services	• By RSP for all technologies
Point of Monitoring	• To the home (to router) results	• In-home (to consumer device) results
Metrics	• Download speed for receiving data • Upload speed for sending data • Latency / Delay between request and response • Packet loss	• Support multiple Netflix streams • Downloading large game files • Latency to Video Conferencing • YouTube streaming quality
Reporting frequency	• Six-monthly	• Quarterly

Period

28. We consider peak-period results to be a requirement for the next phase of the programme.[8] Testing during peak periods reflects the real-world performance that consumers are most likely to experience and captures the degradation in network quality that can occur as traffic volumes increase.

29. This is particularly important when comparing across technologies, as some are more affected by peak-period congestion and experience greater reductions in performance than others.

[7] While fibre plans are typically overclocked by LFCs and have historically exceeded their headline speeds, we see the benefit in retaining a sample to enable monitoring of any future performance declines.

[8] Peak hours are the times when people typically use the internet; in New Zealand this is 7pm to 11pm on Monday-Friday.

Region

30. Historically, separating results between rural and urban areas has been beneficial in providing a more realistic picture of performance for different communities. It has also helped highlight differences in the performance of technologies that are deployed across both settings, such as copper (ADSL and VDSL) and 4G Fixed Wireless.

31. More recently, copper networks have been progressively withdrawn from urban areas, while rural 4G Fixed Wireless performance has remained relatively stable over time and close to national performance. In this context, while geographic splits would still be desirable, we consider that reporting at a national level would meet the minimum requirements and be sufficient for consumer decision making. In our April 2026 report, 4G fixed wireless in all areas had a peak download speed of 44 Mbps compared to 39 Mbps in "rural" areas.[9]

Breakdown

32. At a minimum, we consider reporting at the technology level to be a requirement for the next phase of the MBNZ programme, however with provider-level splits applied to Fixed Wireless. This would involve treating fibre as a single technology category with distinctions for wholesale speed tiers while reporting Fixed Wireless performance at an individual provider or network level. This would still enable consumers to compare different technologies and plans effectively, supporting more informed decisions about the best option for their household, while continuing to support the diagnosis of network performance issues where relevant.

33. Treating fibre as a single technology category reflects the relatively consistent performance observed across providers, where differences are not considered material to consumer choice. In our April 2026 MBNZ report, peak download speeds for Fibre 500 ranged from 497 Mbps to 521 Mbps across providers. For Fibre Max, peak speeds ranged from 869 Mbps to 923 Mbps.[10]

34. Fibre performance is also generally more consistent across households and times of day than Fixed Wireless services. By contrast, Fixed Wireless performance can vary more significantly due to factors such as network loading, location and signal conditions. As a result, provider-level reporting is likely to be more informative for consumers considering wireless options and more useful for identifying performance issues.

35. However, other technologies maybe more provider-specific in nature (for example, LEO satellite). As such, the approach to reporting should remain flexible, so that provider-level testing can be incorporated where it becomes relevant, including if additional providers enter these markets.

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[9] We define rural areas as areas without access to regulated fibre. We currently do not have enough whiteboxes to report an "urban" areas download speed.

[10] https://www.comcom.govt.nz/assets/Uploads/Measuring-Broadband-New-Zealand-Report-27-April-2026.pdf.

36. This approach retains flexibility in how results are generated and presented while ensuring reporting remains focused on differences that are most relevant to consumers and market participants.

Point of monitoring

37. We consider testing to the router, rather than the device, to be essential. Measuring performance at the router provides a more consistent and comparable benchmark across consumers, as it is not affected by variables such as the specific device used or the in-home Wi-Fi setup. Our real-world speed testing has shown that these factors can significantly reduce observed performance, particularly on higher-speed plans such as Fibre Max.

38. Device-level testing illustrates the speeds some consumers are likely to experience in practice, as it introduces additional variability and significantly reduces comparability across results. While we do not consider this a minimum requirement for the future MBNZ programme, in-home broadband performance remains very important. We intend to assess it through other initiatives, such as the Commission's work with Consumer NZ to independently test Wi-Fi routers, or through one-off studies of speeds delivered to end-user devices in the home.

Metrics

39. We consider the core metrics of download speed, upload speed, latency and reliability (packet loss) to be essential for the next phase of the programme. These measures should form the minimum needed to meet programme objectives, enabling consumers to compare overall performance across fibre products.

40. While we recognise the importance of application performance for consumers, we do not believe that this is necessary to meet the objectives of the programme.

Reporting

41. We consider that a six-monthly reporting period for MBNZ information strikes an appropriate balance between timeliness and the administrative burden on providers.

42. A six-monthly cycle would ensure consumers receive sufficiently up-to-date information to inform choice, while avoiding the costs and operational impacts associated with more frequent updates, including changes to customer-facing materials. Most technologies we measure have been stable recently. Across the four reports published between June 2025 and April 2026, peak download speeds for 4G fixed wireless remained relatively stable, ranging from 42 Mbps to 44 Mbps. In contrast, LEO satellite services recorded the largest improvement, with peak download speeds increasing from 196 Mbps to 234 Mbps over the same period.

43. We consider this approach would provide a consistent and proportionate baseline across technologies and limit providers' need to change their marketing materials more regularly while still allowing the programme to measure changes over time.

Appendix 1: Consultation questions

Ref	Question
Q1	Do you agree that peak-period results should be a requirement for the next phase of the programme? If not, why?
Q2	What level of geographic granularity should be the minimum for the programme?
Q3	Do you agree with the proposed approach to incorporating different technologies into testing as a minimum (including fibre speed tiers and the breakdown of FWA by RSP)? If not, how should it differ?
Q4	Is it sufficient for the programme to continue testing "to the router," or are there alternative approaches we should consider as a minimum requirement?
Q5	What core performance metrics should be included in the programme (e.g. download speed, upload speed, latency, reliability), and are there additional metrics that should be considered as minimum requirements?
Q6	How frequently should results be reported as a minimum?
Q7	Are there any additional measures, reporting, or insights that you would like to see included as part of the minimum requirements for the future MBNZ programme that we have not considered?