18 August 2026

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By email: telecommunications@comcom.govt.nz

Dear Andrew

MBNZ Programme Review – Minimum Scope submission

Thank you for the opportunity to provide Enable's views on the Commission's Measuring Broadband New Zealand Programme. The programme and the reports it generates create a valuable source of independent information for the sector, and Enable is supportive of the programme.

Broadly speaking, Enable considers that the proposed changes to the programme are appropriate and reflect a balance between the demands and costs of undertaking the programme, on the one hand, and the benefits to market competition, on the other.

We have the following specific comments in response to your questions.

Q1 Peak-period results

Enable agrees that peak-period results should be a core requirement of the programme.

Peak-period performance is the most relevant indicator for consumers because it reflects network experience during periods of highest utilisation. It also provides the most meaningful basis for comparing different access technologies, particularly where congestion effects may vary significantly between technologies.

Q2 Geographic granularity

Enable broadly agrees with the proposed approach.

Enable considers that additional regional reporting is warranted where there is evidence that geographic factors have a material effect on the performance outcomes of a particular technology. For instance, the performance characteristics of fixed wireless services in densely populated urban areas may differ from those observed in more sparsely populated regions. Regional reporting in these circumstances would assist in presenting a more accurate and representative picture of service performance.

Q3 Different technologies

Enable broadly agrees with the proposed approach.

Enable supports:

- reporting fibre performance by wholesale speed tier rather than by retail provider; and

- provider-level reporting for fixed wireless services, as performance is more dependent on individual network design and operation. As performance of 4G FWA and 5G FWA services differ greatly it is important that these two services continue to be reported separately, as well as at a provider-level (and see further comments below); and
- flexibility for the reporting for other technologies to adapt over time as the range of providers and products available changes.

Q4 Testing to the router

Enable agrees that testing to the router should be the minimum requirement.

Testing to the router provides the most consistent, repeatable and comparable measure of broadband network performance. Testing beyond the router introduces variables that are generally outside the control of network operators and service providers.

While in-home performance is an important consumer issue, measurements at the device level are more appropriate for targeted consumer research initiatives than for the core broadband performance programme.

Enable therefore supports maintaining a clear distinction between broadband access performance and in-home Wi-Fi performance.

Q5 Core performance metrics

Enable agrees that download speed, upload speed, latency and reliability/packet loss should be the core minimum metrics. We also recommend the inclusion of upload speed variability, download speed variability and jitter. These additional metrics reveal characteristics that are important for consumers to understand the performance for different technologies.

Enable does not support including application-specific measures such as streaming, gaming or individual platform performance. Such metrics can become quickly outdated, may favour particular applications, and are often affected by factors beyond the performance of the network itself.

Q6 Frequency of reporting

Enable supports six-monthly reporting as the minimum requirement.

Broadband performance, particularly on fibre networks, has demonstrated a high degree of stability over recent years. More frequent reporting is unlikely to generate materially different consumer outcomes while increasing programme costs and administrative burden.

Six-monthly reporting strikes an appropriate balance between:

- maintaining transparency;
- providing current information to consumers;
- allowing trends to be monitored; and

1 reducing unnecessary compliance and marketing update costs for industry participants.

However, a change to six monthly reporting does reduce the ability of the reporting to show trends and to track changes in performance over time where there is variable performance. Enable submits that the Commission should retain the flexibility to revert to quarterly reporting if this proves to be necessary, but otherwise considers that a six-monthly reporting cycle is proportionate and fit for purpose.

Q7 Additional measures

We note that the 5G FWA results currently included in the programme are derived solely from Spark's customer base and therefore reflect the experience of only a subset of New Zealand's 5G FWA users. As the Commission itself notes, as each RSP has different fixed wireless infrastructure, Spark's results are not directly comparable with other RSPs' results. We therefore encourage the Commission to extend the programme across all 5G FWA providers.

Otherwise, Enable considers that the minimum programme should remain tightly focused on measures that directly support consumer choice and facilitate meaningful technology comparisons.

Conclusion

Thank you again for seeking our views on the proposed programme. None of the information in this submission is confidential. We look forward to seeing the Commission's decision on the future shape of the programme.

Enable Networks Limited