Commerce Commission
By email: telecommunications@comcom.govt.nz

2 September 2026

2026 Review of the Measuring Broadband New Zealand Programme – Minimum Scope

Mercury welcomes the opportunity to comment on the Commerce Commission's proposed minimum scope for the Measuring Broadband New Zealand programme.

Mercury supports all of the proposed changes. Overall, we consider they simplify the programme while retaining the information that is most useful to consumers.

Our responses to the Commission's specific consultation questions are in Appendix 1 below.

Yours sincerely

[redacted]

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Appendix 1: Responses to specific consultation questions

	Question	Mercury response
1	**Do you agree that peak-period results should be a requirement for the next phase of the programme?**	Yes. Peak-period results provide the most relevant indication of broadband performance for consumers.
2	**What level of geographic granularity should be the minimum for the programme?**	Mercury supports national-level reporting as the minimum. This provides useful information while simplifying the programme.
3	**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?**	Mercury supports the proposed approach, including reporting fibre by speed tier and fixed wireless by RSP.
4	**Is it sufficient for the programme to continue testing "to the router"?**	Yes. Testing to the router provides a consistent measure of broadband service performance without introducing additional variables associated with in-home Wi-Fi or customer devices.
5	**What core performance metrics should be included in the programme?**	Mercury supports the proposed core metrics of download speed, upload speed, latency and reliability/packet loss. We do not consider additional metrics are necessary as minimum requirements.
6	**How frequently should results be reported as a minimum?**	Mercury supports six-monthly reporting. This is sufficient to keep information current while reducing unnecessary reporting and administrative effort.
7	**Are there any additional measures, reporting, or insights that you would like included?**	No. Mercury considers the proposed minimum requirements appropriate and does not see a need to add further measures.