Tuatahi First Fibre Limited submission on the Commerce Commission document: *2026 Review of the Measuring Broadband New Zealand programme – Minimum scope*

18.08.2026

We welcome the opportunity to provide feedback on the Commerce Commission's (the **Commission**) *2026 Review of the Measuring Broadband New Zealand programme – Minimum scope* (the **Review document**). The Measuring Broadband New Zealand programme (**MBNZ**) is an important part of the Commission's Retail Service Quality monitoring work programme. The provision of independent reporting on broadband product and technology performance is important for substantiating performance claims made in marketing of the various products to consumers. We see substantial value in the programme for consumers and are very supportive of the continuation of an independent MBNZ programme.

Summary

Tuatahi supports the review of the MBNZ reporting, to ensure that it right-sized and focussed on measuring the right metrics to support the Retail Service Quality work the Commission undertake to fulfil the requirements under s9A of the Telecommunications Act.

Our feedback is focussed on ensuring that the minimum testing requirements provide information that effectively informs consumer understanding of the various broadband choices available to them. The main point of concern we have with the initial proposal is the movement of real-world application measurements to a "*nice to have*" rather than a requirement. These real-world application measurements provide the consumer with easy-to-understand information regarding the differences that they can expect between technology types.

While the measurement of how many simultaneous video streams can be supported by the differing Fibre plan options offers minimal insight for consumers, it is insightful to compare the real-world capability of different technologies. The latest MBNZ report[1] shows that the LEO Satellite 100 Mbps product provides capability to support 1-2 video streams simultaneously, versus the Fibre 100 plan capable of supporting 4+ video streams.

If there is a differing mechanism to ensure metrics are captured and provided in a manner that helps consumers understand the practical differences between their broadband technology options, we are open to an alternative.

We see the provision of practical, clear and easy to understand information on the differing product

[1] https://www.comcom.govt.nz/assets/Uploads/Measuring-Broadband-New-Zealand-Report-28-July-2026.pdf Figure 24

and technology quality as key to meeting the requirements set out in s9A(1)(f) of the Telecommunications Act 2001. In practice, the measurement and provision of reporting on real-world applications helps support the substantiation of marketing to consumers through an independent source.

Our answers to questions posed in the Review document are contained below:

Question 1: Do you agree that peak-period results should be a requirement for the next phase of the programme? If not, why?

Yes, we view it as an essential consumer facing performance measure. This is because it reflects the period when networks are under the most pressure, and the greatest number of consumers are likely to experience performance issues.

Question 2: What level of geographic granularity should be the minimum for the programme?

The proposal to treat the rural and urban break down as a “nice to have” likely makes sense from a statistical analysis point-of-view. If the sample size of the rural sampling pool is not large enough to draw meaningful conclusions regarding differing service levels between the urban and rural split.

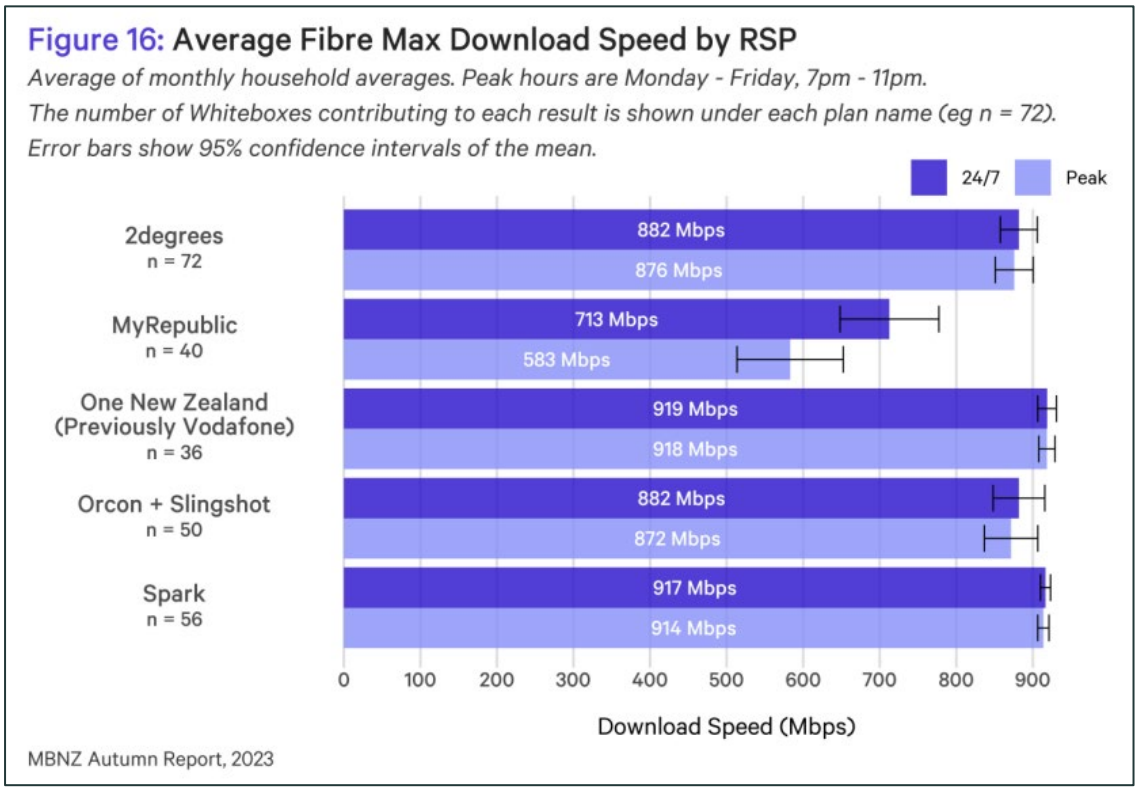
However, given there are differences in technology choices available to urban and rural consumers, if it is possible to have a statistically significant sample size to represent rural consumer choices, this should be prioritised.

This would allow rural consumers to receive accurate and relevant information regarding their broadband service options performance and offer some insight into the rural-urban digital divide. While this is not the purpose of the reporting, it is a positive side-effect, and should be considered. If this geographic granularity is too detailed, then we recommend a targeted rural monitoring report be considered.

Question 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)? If not, how should it differ?

We agree, but submit that Fibre plans should also remain split by RSP or provider to ensure that each RSP is sufficiently incentivised to continue to offer the level of performance and service advertised to consumers.

We agree that the reporting has shown fibre performance is generally consistent, however there have been RSP performance issues in the past that were highlighted through reporting. For example, in 2023 MyRepublic was a performance outlier, which required attention to address[2]:



We see value in continuing to monitor this breakdown for this reason, and recommend this reporting be continued.

Question 4: Is it sufficient for the programme to continue testing "to the router", or are there alternative approaches we should consider as a minimum requirement?

Yes. This is the most appropriate point of measurement for the service being supplied to the consumer premises, as testing to a device could introduce a risk of data manipulation caused by in-home router performance issues and not the broadband network. Therefore, we see the cleanest, most appropriate, information gathering point as being "to the router".

Question 5: 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?

We support the proposed core metrics. However, these metrics need to be converted into real world applications that hold meaning for a reasonably informed customer. This also means the data must be presented in a manner that is consumer friendly, and helps understanding of differing performance characteristics.

Real-world application measurements provide the consumer with easy-to-understand information

[2] https://www.comcom.govt.nz/assets/pdf_file/0016/320326/MBNZ-Autumn-Report-28-June-2023.pdf

regarding the differences that they can expect between technology types. The use of technology *jargon* can be notoriously difficult for the average consumer to understand, and it is important to demystify this as much as possible.

While the measurement of how many simultaneous video streams can be supported by the differing Fibre plan options offers minimal insight for consumers, it is insightful to compare the real-world capability of different technologies. The latest MBNZ report[3] shows that the LEO Satellite 100 Mbps product provides capability to support 1-2 video streams simultaneously, versus the Fibre 100 plan capable of supporting 4+ video streams. This type of comparison is helpful for consumers who are making decisions around what type of technology and product to purchase for their broadband needs and usage.

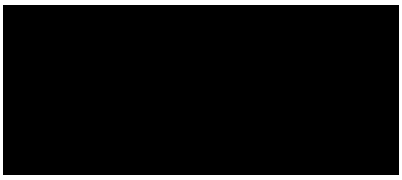
If there is a differing mechanism to ensure metrics are captured and provided in a manner that helps consumers understand the practical differences between their broadband technology options, we are open to an alternative. However, In practice, the measurement and provision of reporting on real-world applications helps to support the substantiation of marketing to consumers through an independent source. So, we see it as an important component of the information provided through the MBNZ reporting.

Question 6: How Frequently should results be reported as a minimum?

While we have no issue with the current quarterly reporting model, we support a move to 6 monthly reporting if that is preferred by the Commission. Generally speaking, there are not significant changes occurring within the quarterly cycle that support the need for the current frequency. Savings made through less frequent reporting could be redeployed to improve the quality of information being reported.

Question 7: 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?

Yes, the MBNZ reporting should reflect the broadband product options available to consumers. We would therefore like to see adequate 5G fixed wireless access (**FWA**) monitoring across providers. This data supports consumer marketing, and it is important to have a sufficient data set across providers to support this. Current FWA reporting does not adequately reflect the services consumers are being offered. We would like to see any savings that can be made through streamlining the MBNZ programme applied to improving the 5G FWA sampling.



Tuatahi First Fibre

[3] https://www.comcom.govt.nz/assets/Uploads/Measuring-Broadband-New-Zealand-Report-28-July-2026.pdf Figure 24