

Fibre Information Disclosure Amendments 2025

Final Decision – Reasons paper



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Fibre Information Disclosure amendments

Purpose

- 1.1 We are making changes to the fibre information disclosure (**Fibre ID**) requirements so that they:¹
 - 1.1.1 remain fit for purpose;
 - 1.1.2 keep pace with changes in the industry and competitive landscape; and
 - 1.1.3 improve the quality of information available to stakeholders seeking to understand how the Local Fibre Companies (**LFCs**) are performing.
- 1.2 The regulated LFCs (also referred to in this paper as **regulated providers**), to which the final decisions apply, are:
 - 1.2.1 Chorus Limited (**Chorus**); and
 - 1.2.2 Enable Networks Limited (**Enable**), Tuatahi First Fibre Limited (**Tuatahi**), and Northpower Fibre Limited (**Northpower Fibre**) (together, the **ID-only regulated providers**).²
- 1.3 The focus of the changes is on the regulated providers' publicly disclosed metrics providing more timely and meaningful information on consumer quality, prices, asset management and financials. These changes are guided by our Fibre ID Reviews Framework paper, which outlines the approach used to set and amend Fibre ID requirements.³
- 1.4 The final decisions:
 - 1.4.1 reflect stakeholder feedback on our Fibre Information Disclosure Amendments 2025 Draft Decision – Reasons Paper (**draft decision reasons paper**);⁴
 - 1.4.2 make consequential changes arising from changes to formulas in the input methodologies (**IMs**);
 - 1.4.3 correct errors in definitions and templates;

¹ The existing Fibre ID requirements are set out in the [Fibre Information Disclosure Determination 2021](#) [2021] NZCC 24 (**Fibre ID Determination**). A consolidated version of this determination, including amendment determinations, is available; Commerce Commission: [Fibre Information Disclosure Determination 2021 – Consolidated Version](#) (1 May 2024).

² Chorus is the only regulated provider subject to price-quality regulation

³ Commerce Commission: [Fibre Information Disclosure Reviews – Framework paper](#) (16 October 2025).

⁴ Commerce Commission: [Fibre Information Disclosure Amendments 2025 – draft decision reasons paper](#) (5 August 2025).

- 1.4.4 are mainly technical in nature and are intended to reduce uncertainty; and
- 1.4.5 align reporting across the regulated providers.

Application dates

- 1.5 The changes to Fibre ID requirements will take effect from the first day of the respective regulated provider’s disclosure year (**DY**) in 2026 – see Table 1.
- 1.6 With reference to the categories in Table 2 below, exceptions to that date are changes for:
 - 1.6.1 “Outages”, where the application date is 1 January 2026 for all regulated providers;⁵
 - 1.6.2 “Defined service for network performance testing “, where the application date is 1 January 2026 for all regulated providers; and
 - 1.6.3 “the Benefit of Crown financing reporting for ID-only regulated providers”, where the application date is 1 January 2026 for the DY2026 reporting.^{6,7}

⁵ This is a change from our draft decision. See the “Outage” category in Table 2 for more details.

⁶ Chorus and the other LFCs received financing from the Crown to assist in the construction of the Ultra-fast Broadband (UFB) network under the UFB initiatives. Under the UFB agreements between regulated providers and the Crown, favourable financing terms apply which provide a benefit to the regulated providers (this is referred to as “the Benefit of Crown financing”). More on the treatment of Crown financing can be found in our website. See Commerce Commission: [Fibre input methodologies: Main final decision -reasons paper](#) (13 October 2020) paragraphs 3.168 and onwards.

⁷ The disclosure requirements on Benefit of Crown financing are not changing – the schedule allows ID-only regulated providers to comply with existing requirements.

Table 1: Disclosure years and application dates for each regulated provider

Regulated provider	Disclosure year	Application date for the 2025 ID amendments	First intra-year disclosure for revised requirements	First annual disclosure for revised requirements^{8,9}
Chorus	12 months ending 31 December	1 Jan 2026	30 September 2026	31 May 2027
Northpower Fibre & Tuatahi	12 months ending 31 March	1 April 2026	31 December 2026	31 August 2027
Enable	12 months ending 30 June	1 July 2026	31 March 2027	30 November 2027

Structure

- 1.7 The remainder of the paper is organised as follows:
- 1.7.1 Changes to the Fibre ID requirements and reasons for the changes (Table 2)
 - 1.7.2 Appendix A – Stakeholder feedback on the draft decisions, along with our responses.
 - 1.7.3 Appendix B – Glossary; and
 - 1.7.4 Appendix C – Associated documents.

⁸ The public disclosures are due five months after the disclosure year end for each provider. See [Fibre Information Disclosure Determination 2021 – Consolidated Version](#) (1 May 2024), clauses 2.3.1 and 2.4.2.

Changes to the Fibre Information Disclosure requirements

Table 2 below sets out the changes we have made to the Fibre ID requirements (determination and schedule templates). Each row covers a different “Category” of changes and includes a description of the final decision, why the change is required, reasons for the final decision, and any changes from our draft decisions.

Table 2: Final decisions on amendments to the Fibre ID determination and schedule templates

<i>Final decision</i>	<i>Changes to determination and schedule templates¹⁰</i>
<p>Category: Outages</p> <p><i>Disclosure group: Quality</i></p> <p><i>Amendment type: Change of existing requirement</i></p> <p><i>Change from draft decision: Amended following consideration of stakeholder feedback</i></p>	
<p><i>Final decision</i></p> <p>Our final decision is to require regulated providers to use customer-reported faults as the basis for unplanned downtime reporting starting from 1 January 2026. This is given effect by introducing new definitions and amending existing formulas used to calculate average downtime.</p> <p><i>Why is change required?</i></p> <p>The definitions of “outage” and “unplanned outage” in the Fibre IMs and the Fibre ID determination, are not specific enough to ensure consistent reporting of unplanned outages across regulated providers.¹¹</p> <p>There is no existing threshold in the Fibre IMs or the Fibre ID determination as to what constitutes a material outage, and regulated providers had different approaches for reporting downtime from self-monitoring systems, making comparisons difficult.</p>	<p><u>Determination changes</u></p> <p>average customer-reported unplanned downtime (amendment)</p> <p>average net customer-reported unplanned downtime (amendment)</p> <p>customer-reported unplanned downtime</p>

¹⁰ Changes to definitions in the determination are in bold.

¹¹ Commerce Commission: [Fibre Input Methodologies Determination 2020](#) [2020] NZCC 21 (13 October 2020), clause 1.1.4.

Final decision	Changes to determination and schedule templates¹⁰
<p><i>Reasons for the final decision</i></p> <p>Our final decision:</p> <ul style="list-style-type: none"> - simplifies the reporting by clearly excluding self-identified faults / downtime (before an RSP, for example, notifies the regulated provider of a fault); - provides a consistent threshold for the point from which unplanned downtime should be included in disclosures; - allows for more meaningful comparisons across regulated providers of the quality experienced by consumers on service interruptions; and - is in line with the approach adopted to setting unplanned downtime requirements for Chorus’ 2025-2028 PQ path (PQP2).¹² <p>Consistency in unplanned downtime reporting can be achieved by implementing a “fault notification” definition as the boundary (ie, trigger point) for the start of an outage. The total number of customers impacted by an outage should then be verified through the regulated providers’ monitoring systems so that unplanned downtime better reflects the total end-user impact (and not only the impact captured by customers that report an outage).¹³</p> <p>In a change from our draft decision, all regulated providers must comply with these amendments from 1 January 2026 (instead of only Chorus). Without this change, further exemptions would be required as the existing ID exemption expires on 31 December 2025.¹⁴ We do not expect the amendments to require the ID-only regulated providers to make extensive changes as the new reporting requirements are effectively a subset of those under the existing ID exemption. Selecting a fixed point in time for implementation will also improve consistency in reporting across industry sooner.</p>	<p>customer-reported unplanned downtime attributable to force majeure events and non-diverse transport services (amendment)</p> <p>fault cause (amendment)</p> <p>fault notification</p> <p>faults per 100 connections (amendment)</p> <p>percentage of regulated provider faults not restored within 2 calendar days (amendment)</p> <p>percentage of regulated provider faults that met expected restore date (amendment)</p>

¹² Commerce Commission: [Fibre Price-Quality Path Determination 2024](#) [2024] NZCC 34 (13 December 2024), clause 4.2.

¹³ As detailed on page 6 of the draft decision reasons paper, we considered alternative options for this measure and ultimately considered that the benefits of imposing such additional ID requirements are unlikely to outweigh the costs at this time.

¹⁴ Commerce Commission: [Fibre ID Exemption – ID-only regulated providers – Outages](#) (9 April 2025).

<i>Final decision</i>	<i>Changes to determination and schedule templates¹⁰</i>
<p>We have also updated certain terms and definitions to retain consistency with the way the existing schedules operate while still giving effect to the policy intent of our draft decisions.¹⁵ This includes making the exception related to faults to “non-diverse transport services” consistent with the existing force majeure events exception. Submitters all supported this amendment and some clarifications were raised. Key submission points (with references) and our responses can be found in Appendix A.¹⁶</p>	<p>net customer-reported unplanned downtime</p> <p>non-diverse</p> <p>non-diverse transport services</p> <p>number of reported faults (amendment)</p> <p>reported fault</p> <p><u>Schedules</u></p> <p>Schedule 19(ii), (iii) for Chorus</p> <p>Schedule 20(ii), (iii) for ID-only regulated providers</p>

¹⁵ The key change for “Availability (iii)” reporting is updating the term used in the schedule from “Unplanned downtime” to “Customer-reported unplanned downtime” to ensure this downtime value is reported and then used as an input to further downtime calculations. Similarly, for “Faults (ii)” reporting, updating the defined term used for “Number of faults” to “Number of reported faults” (customer-reported) to be used as an input to further fault calculations.

¹⁶ We also engaged with the regulated providers in advance of draft decisions, and details of this engagement can be found in Appendix A of the draft decision reasons paper.

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Disclosure frequency of quality reports</p> <p><i>Disclosure group: Quality</i></p> <p><i>Amendment type: New requirement</i></p> <p><i>Change from draft decision: Amended following consideration of stakeholder feedback</i></p>	
<p><i>Final decisions</i></p> <p>Our final decisions are to:</p> <ol style="list-style-type: none"> 1) introduce an intra-year disclosure requirement for the Report on Quality that must be publicly disclosed within three months of the end of the reporting period (first six months of a disclosure year); 2) within the new Schedule 17a, introduce a technical expert certification requirement for the new intra-year disclosure; and 3) within the existing annual mandatory explanatory note disclosure,¹⁷ introduce a requirement for a description of any material differences between the annual and new intra-year Report on Quality disclosures for that disclosure year. <p><i>Why is change required?</i></p> <p>The four regulated providers have three different disclosure year ends (see Table 1 above). Disclosing information on quality of service annually does not allow for timely and meaningful performance comparisons, since, by the time the disclosures are made by all providers, some information is significantly older or out-of-date.</p> <p><i>Reasons for the final decisions</i></p> <p>Our final decisions:</p> <ul style="list-style-type: none"> - will allow for timely comparisons of quality metrics across regulated providers; 	<p><u>Determination changes</u> Clauses 2.3.3(1) and 2.4.4(1)</p> <p>Clause 2.8.1A</p> <p>Schedules 14 and 14A</p> <p>Schedule 17a: Certification by technical expert</p> <p>Schedule 18 a)</p> <p>audited disclosure information (amendment)</p> <p>technical expert</p> <p><u>Schedules</u> N/A</p>

¹⁷ Schedule 14 for Chorus, Schedule 14A for the ID-only regulated providers

Final decision	Changes to determination and schedule templates¹⁰
<ul style="list-style-type: none"> - will allow for better monitoring of the on-going performance of individual regulated providers to identify developing trends sooner;¹⁸ and - do not require new information to be collected or existing information to be recorded more frequently – the information in the Report on Quality is already collected monthly. <p>Our final decisions balance the benefits of improved and timely monitoring with the cost of the additional public disclosure by:</p> <ul style="list-style-type: none"> - not requiring an assurance report and reducing certification costs by requiring sign-off by a technical expert only (rather than audited and director-certified disclosures); - aligning the disclosure deadline with the intra-year Report on Pricing disclosures to leverage processes;¹⁹ and - choosing a reporting period of six months instead of more frequent (eg, quarterly) reporting. <p>In a change from our draft decision, we have deferred the disclosure of this information by two months to align with the new due date for the intra-year pricing disclosure (which further supports cost considerations) and submissions supporting this change. The new explanatory note requirement will help stakeholders understand any changes to the interim (intra-year) information.</p> <p>Chorus, Tuatahi, and Enable generally opposed the proposed amendments, while Northpower Fibre stated it did not have an issue with the new requirement. Key submission points (with references) and our responses can be found in Appendix A.</p>	

¹⁸ Although there may be some differences in certain measures, this includes Chorus’ reporting against quality dimensions that the existing Chorus PQ standards also use (Availability and Performance). Chorus is required to disclose an annual quality assessment within five months of the DY end to the Commission only.

¹⁹ [Fibre Information Disclosure Determination 2021 – Consolidated Version](#) (1 May 2024), clauses 2.3.4(1) and 2.4.5(1).

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Provisioning reporting</p> <p><i>Disclosure group: Quality</i></p> <p><i>Amendment type: New requirement + change to existing requirements</i></p> <p><i>Change from draft decision: Amended following consideration of stakeholder feedback</i></p>	
<p><i>Final decisions</i></p> <p>Our final decisions are to:</p> <ol style="list-style-type: none"> 1) introduce a new measure for regulated providers to report the number of new connections that required two or more rescheduled provisioning appointments to complete (decision 1);²⁰ 2) revise existing definitions related to provisioning appointments to support the new reporting requirement above. This includes adding further exceptions to the definition of “rescheduled provisioning appointment” (decision 2); 3) amend existing missed provisioning appointment reporting – by moving the reporting requirements from Schedule (v) “Customer Service” to Schedule (i) “Provisioning” within the Report on Quality templates; extending this reporting to Point of Interconnection (POI) Areas in line with the format of Schedule (i); and amending relevant definitions (decision 3); and 4) make a minor change to the existing Provisioning reporting by introducing a new summary row in the template for the national reporting of provisioning measures (decision 4).²¹ 	<p><u>Determination changes</u></p> <p>rescheduled provisioning appointment</p> <p>multiple rescheduled provisioning appointments</p> <p>number of provisioning appointments missed</p> <p><u>Schedules</u></p> <p>Schedule 19(i), 19(v) for Chorus</p> <p>Schedule 20(i), 20(v) for ID-only regulated providers</p>

²⁰ These are rescheduled appointments that are within the regulated provider’s control, though some exclusions apply (see definition of “rescheduled provisioning appointment”)

²¹ This change applies only where values can be appropriately aggregated by simply summing disaggregated values (eg, excluding percentage-based measures).

Why is change required?

Complaints and performance data show that rescheduled appointments have been an ongoing cause of dissatisfaction with quality of supply for access seekers and end-users.²² Rescheduled appointments are also a dead-weight industry cost that detracts from the efficient operation of regulated providers and so does not give effect to the Part 6 purpose.

Reasons for final decisions

Increased and better-defined disclosures on provisioning appointments (including rescheduled appointments) and other provisioning metrics, as well as improved monitoring, will encourage regulated providers to focus on improving their provisioning practices to meet end-user expectations. Additionally:

- The new reporting requirements on rescheduled appointments (decisions 1 and 2) will help stakeholders understand whether the provisioning of FFLAS connections is meeting end-user expectations. The changes provide greater transparency over connections that require multiple repeat appointments to provision, where additional appointments are not requested by consumers.
- Reporting of missed appointments in line with other provisioning metrics and at the same level of disaggregation (decision 3) will allow for direct comparisons between missed appointments and other measures (eg, missed agreed date, the percentage of missed appointments).
- National summary reporting (decision 4) will help interested parties to draw comparisons between regulated providers, including in our analysis through our visualisation tool on fibre performance.²³

After considering submission feedback, we still consider that the benefit of this requirement being applied to all regulated providers outweighs the overall cost. In terms of the purpose of ID and purpose of Part 6 of the Act, the number of provisioning jobs that required multiple rescheduled appointments to complete would indicate whether there is sufficient investment in systems, processes, and training to help ensure an installation is done right the first time (and quality of service meets end-user expectations).²⁴

We have accepted submissions on the proposed change to the definition of missed provisioning appointment (to require end-user confirmation of end-user absence) and have decided not to proceed with this amendment. While regulated providers indicated that our expectations for confirming end-user availability are consistent with industry practice, we acknowledge the cost concerns raised around recording and reporting to an auditable standard.²⁵ Upon further review of the proposed definition, we also consider that a similar auditability issue applies with the existing definition to verify that an end-user is “not present.” We have added this issue to the Fibre Information

Final decision	Changes to determination and schedule templates¹⁰
<p>Disclosure issues register for further consideration on a potential change in future.²⁶</p> <p>Submitter feedback on the proposed amendments was mixed. Key submission points (with references) and our responses can be found in Appendix A.</p>	

²² In our final reasons paper on the Chorus 2025-2029 price-quality path, we noted that improving provisioning monitoring through ID is a proportionate approach to the concerns raised by stakeholders. See Commerce Commission: [Chorus' price-quality path for the second regulatory period \(2025 – 2028\) – final decision: Reasons paper](#) (13 December 2024), paragraphs 4.228-4.280.

²³ The Fibre Performance Visualisations can be accessed via our website [here](#).

²⁴ Telco Act, s162(a) and s162(b).

²⁵ As stated on page 9 of the draft decision reasons paper, our expectation that installers make reasonable enquiries to ensure that the end-user is not home before rescheduling an appointment. For example, contacting the end-user via SMS and at a minimum, approaching the premises and signal arrival (eg, doorbell, knocking on the door).

²⁶ Once published, the register can be found at the following location: [Commerce Commission, Fibre Information Disclosure – Issues and guidance register](#)

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Defined service for network performance testing</p> <p><i>Disclosure group: Quality</i></p> <p><i>Amendment type: Change to existing requirement</i></p> <p><i>Change from draft decision: Amended following consideration of stakeholder feedback</i></p>	
<p><i>Final decisions</i></p> <p>Our final decisions are:</p> <ol style="list-style-type: none"> 1) to define a reference Bitstream service – the 500/100 Bitstream service – to be used for network performance testing, as required by the methodology for calculating port utilisation and traffic performance under Schedule 22 of the Fibre ID Determination (Schedule 22 methodology);²⁷ 2) to add a definition for Committed Information Rate (CIR) related to network traffic. Consistent with existing requirements, this term is incorporated within the definition for the reference Bitstream service; and 3) for these changes to come into effect for all regulated providers on 1 January 2026.²⁸ <p><i>Why is change required?</i></p> <p>The existing ID requirement uses a Bitstream service based on the anchor service requirement (100/20 service).²⁹ However, we are aware that there are few-to-no end-users of this service due to the regulated providers “boosting” the headline speeds of their mass market products. To ensure that meaningful network performance testing is in place until the reference Bitstream service can be amended in the Fibre ID Determination, we issued regulated</p>	<p><u>Determination changes</u></p> <p>Clause 3) n) of the Schedule 22 methodology</p> <p>reference bitstream service committed information rate (CIR)</p> <p><u>Schedules</u></p> <p>Schedule 19(iv) for Chorus</p> <p>Schedule 20(iv) for ID-only regulated providers</p>

²⁷ These two values are the headline speeds of the service. For example, this 500/100 service has headline speeds of 500 Mbps downstream and 100 Mbps upstream. While not referred to for readability purposes, the service must also have a CIR of 2.5 Mbps (unchanged from existing requirement).

²⁸ An effective date of 1 January 2026 means that the first disclosures that will incorporate these changes are those by Northpower Fibre and Tuatahi, which would be due by 31 August 2026. This is because Northpower Fibre and Tuatahi will be required to publicly disclose reporting for the final three months of disclosure year 2026 (i.e., January to March 2026 for the disclosure year ending 31 March 2026). The existing exemption would apply to the months of disclosure year 2026 prior to 1 January 2026.

²⁹ The existing clause 3) n) of the Schedule 22 methodology notes that “the reference probes and test OVC must be configured using an anchor service bitstream profile [...] of 100Mbps downstream, 20Mbps upstream, and 2.5Mbps CIR in each direction... “.

Final decision

Changes to determination and schedule templates¹⁰

providers with exemptions that allow them to undertake testing using the 300/100 Bitstream service and subsequently the 500/100 Bitstream service.^{30, 31}

Reasons for final decisions

Our final decisions:

- align the Bitstream service used for network performance testing with the service used by the majority of fibre residential end-users, making the measures reported more relevant to stakeholders;
- are consistent with the exemption for traffic performance testing we issued earlier this year and so ensure consistency of reporting over time; and
- align the definition of the term “CIR” used in the Fibre ID Determination with existing industry standard.

We have updated our draft decision to define the reference Bitstream service as a 500/100 service. Most end-users are now consuming this service due to a recent speed boost.³² After considering submission feedback, we are satisfied that the existing thresholds remain appropriate and do not require adjustment. Any future changes will be considered through an ID amendment (or exemption) process, which provides an opportunity for review by both the Commission and industry.

We recognise the potential confusion around traffic priority (ie, high or low) and priority traffic classes when defining CIR. After considering points raised by Chorus and Enable, we have amended the proposed definition for consistency with the New Zealand Telecommunications Forum’s (TCF) “UFB Ethernet Access Service Description” (TCF whitepaper).^{33, 34} To avoid confusion, we have not adopted the proposed “Excess Information Rate” (EIR) term as it is not an existing requirement under ID.

We have not implemented a future-proof mechanism (options discussed below). However, changes to the defined

³⁰ Commerce Commission: [Fibre ID Exemption – ID-regulated providers – Traffic performance testing \(Schedule 22\)](#) (15 June 2023).
³¹ Commerce Commission: [Fibre ID Exemption – ID-regulated providers – Traffic performance testing \(Schedule 22\)](#) (15 August 2025).
³² We have also made a slight modification to the ‘(iv) Performance’ section of the Report on Quality template. The change is to require disclosure of the reference Bitstream service used for testing in that month to help stakeholders better understand any changes.
³³ NZ TCF: [UFB Ethernet Access Service](#) (11 May 2017).
³⁴ Ibid, page 17. While we have not adopted the traffic priority classes defined in the TCF whitepaper, we have simplified the term CIR so it reflects the technical definition in the TCF whitepaper that states “CIR = discard ineligible”.

Final decision	Changes to determination and schedule templates¹⁰
<p>anchor service may occur in future and depending on how that service is defined, it may be possible to re-establish a link between this service and the ID Determination. Consistent with Option 2 below, we encourage regulated providers to communicate with us ahead of a potential exemption related to a speed boost. A consensus on a proposed reference Bitstream service and implementation timeframe would help streamline the exemption application process and reduce the correspondence required between Commission staff and regulated providers. Key submission points (with references) and our responses can be found in Appendix A.</p> <p><i>Alternative options considered</i></p> <p>In reaching our final decisions, we considered the following options raised for a future-proof mechanism in submissions:³⁵</p> <ul style="list-style-type: none"> - <i>Option 1:</i> as suggested by Chorus, include a mechanism that automatically changes the reference service - <i>Option 2:</i> as suggested by Enable and Tuatahi, include a less prescriptive requirement that would require agreement between regulated providers and the Commission to change the reference service <p>Like the “Option 1” considered in the draft decision reasons paper (change based on the number of end-users reported under ID),³⁶ we consider that implementing Option 1 above risks greater uncertainty and complexity for regulated providers. It could also result in inconsistent reference services across regulated providers, complicating industry comparisons for stakeholders. Chorus’ proposal also introduces terms not currently used under ID, which could cause confusion if defined without broader engagement.</p> <p>Our final decision is simpler to implement and provides greater certainty since any changes will have to be made via ID amendment, if appropriate.³⁷ This process provides stakeholders with better oversight of any changes and potential involvement through consultation. We discounted Option 2 as this is effectively an exemptions process (consistent with our final decision) with less stakeholder oversight.</p>	

³⁵ Chorus Limited: [Chorus response to Fibre Information Disclosure amendments 2025 draft decision - Reasons paper](#) (2 September 2025) (**Chorus submission**), page 7. Enable Networks Limited: [Submission to Fibre ID Amendments 2025 – Draft Decision](#) (2 September 2025) (**Enable Submission**) page 3. Tuatahi First Fibre: [Submission in response to the Fibre Information Disclosure Amendments 2025 – Draft Decision](#) (2 September 2025) (**Tuatahi submission**), page 2.

³⁶ Commerce Commission: [Fibre Information Disclosure Amendments 2025 Draft Decision - Reasons paper](#) (5 August 2025), page 12.

³⁷ In the context of this issue, ID amendment includes exemptions to existing ID requirements.

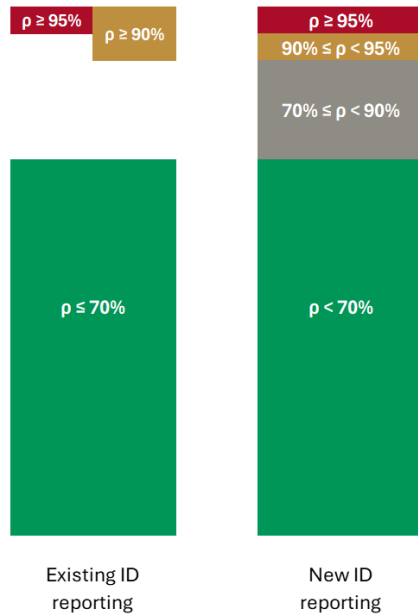
Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Port utilisation bands</p> <p><i>Disclosure group: Quality</i></p> <p><i>Amendment type: Minor change to existing requirement</i></p> <p><i>Change from draft decision: No change from draft decision</i></p>	
<p><i>Final decision</i></p> <p>Our final decision is to reframe the existing port utilisation reporting bands into the following four contiguous bands:</p> <ul style="list-style-type: none"> - Percentage of ports with port utilisation (ρ) equal to or exceeding 95% ($\rho \geq 95\%$) - Percentage of ports with port utilisation (ρ) equal to 90% and up to 95% ($90\% \leq \rho < 95\%$) - Percentage of ports with port utilisation (ρ) equal to 70% and up to 90% ($70\% \leq \rho < 90\%$) - Percentage of ports with port utilisation (ρ) below 70% ($\rho < 70\%$) <p><i>Why is change required?</i></p> <p>The existing format has an overlap between the different port utilisation bands reported, which makes them less straightforward to interpret and requires data manipulation for visualisations.</p> <p><i>Reasons for final decision</i></p> <p>Figure 1 below shows the difference between the existing ID reporting and new ID reporting. The updated reporting bands align better with the thresholds currently used within industry with respect to congestion response management practice.</p>	<p><u>Determination changes</u></p> <p>$\rho \geq 95\%$ threshold</p> <p>$90\% \text{ threshold} \leq \rho < 95\%$ threshold</p> <p>$70\% \leq \rho < 90\%$ threshold</p> <p>$\rho < 70\%$ threshold</p> <p><u>Schedules</u></p> <p>Schedule 19(iv) for Chorus</p> <p>Schedule 20(iv) for ID-only regulated providers</p>

Final decision

Changes to determination and schedule templates¹⁰

Figure 1: Existing and new ID port utilisation reporting bands

(where ρ = port utilisation expressed as a percentage)



This change will make port congestion information easier to understand and interpret by:

- reducing data complexity by using contiguous bands; and
- including reporting for the percentage of ports with port utilisation (ρ) equal to 70% and up to 90% ($70\% \leq \rho < 90\%$), which currently is not available without calculation.

We consider the change to be minor and expect that implementing the new format of reporting will not be associated with notable costs for regulated providers.

Submissions on this proposed change were all in support.

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Benefit of Crown financing reporting for ID-only providers</p> <p><i>Disclosure group: Finance</i></p> <p><i>Amendment type: Minor new requirement</i></p> <p><i>Change from draft decision: No change from draft decision</i></p>	
<p><i>Final decisions</i></p> <p>Our final decisions are:</p> <ol style="list-style-type: none"> 1) to introduce a new schedule for ID-only providers—Schedule 8(v): Annual Benefit of Crown Financing; 2) to make consequential amendments to ROI-related disclosures in Schedules 8(iii) and 1(ii) for ID-only regulated providers to incorporate the annual benefit of Crown financing; and 3) for these changes to come into effect on 1 January 2026, therefore allowing ID-only regulated providers to fill in Schedule 8(v) when making DY2026 disclosures. <p>This is a minor amendment to allow ID-only regulated providers to disclose the annual benefit of Crown financing and associated Crown financing balances, consistent with existing ID requirements.</p> <p><i>Why is change required?</i></p> <p>Northpower Fibre informed us that the existing schedules do not allow them to report the benefits of Crown financing.³⁸ When the fibre ID requirements were originally set, the schedule template where ID-only providers can disclose the annual benefit of Crown financing was not included because of the information available at the time led us to believe all ID-only regulated providers no longer had Crown financing obligations.</p> <p><i>Reasons for final decisions</i></p> <p>Our final decisions will allow ID-only regulated providers to make disclosures, if relevant, on the benefit of Crown Financing in line with the existing ID requirements. The new schedule is similar to the equivalent schedule Chorus</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 1(ii), 8(iii) and 8(v) for ID-only regulated providers</p>

³⁸ We exempted Northpower Fibre from having to disclose Crown financing related requirements, as the schedule templates did not allow for this. See Commerce Commission: [Fibre ID Exemption Northpower Fibre Limited Crown Financing](#) (30 August 2023).

<i>Final decision</i>	<i>Changes to determination and schedule templates¹⁰</i>
<p>uses to report on the benefit of Crown financing.</p> <p>There were no explicit submissions on this change. Northpower Fibre did not oppose the change.³⁹</p>	

³⁹ On page 2 of its submission, Northpower Fibre stated that it is broadly supportive of the changes proposed in the draft determination and reasons paper, so for ease of reading, it only provided opposing views or requests for further clarification in this submission. Northpower Fibre did not provide any views on this change.

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Consequential Crown financing amendment</p> <p>Disclosure group: Finance</p> <p>Amendment type: Minor change to existing requirement</p> <p>Change from draft decision: No change from draft decision</p>	
<p><i>Final decisions</i></p> <p>Our final decisions are to:</p> <ol style="list-style-type: none"> 1) amend Chorus Schedule 8b(i) to enable the disclosure of the Annual Benefit of Crown Financing in line with recent amendments to the Fibre IMs;⁴⁰ and 2) remove current rows 22 and 23 from Chorus Schedule 8b(i), which are calculated columns disclosing the components (AxB and CxD) used under the previous methodology. 3) update the Annual Benefit of Crown Financing entry in Chorus Schedule 8b(i) to a manual input, which must be calculated in accordance with: <ul style="list-style-type: none"> - IM clause 2.4.10(1) for the disclosure year value; and - IM clause 3.5.11(1) for the forecast value. 4) require a manual entry for the annual benefit of Crown financing in new Schedule 8(v): Annual Benefit of Crown Financing for ID-only regulated providers (as outlined above). <ul style="list-style-type: none"> - This value must be calculated in accordance with IM clause 2.4.11(1). - ID-only regulated providers will not be required to disclose a forecast value. <p><i>Why is change required?</i></p> <p>The existing ID requirements are not aligned with the Fibre IMs, as amended.</p> <p><i>Reasons for our final decisions</i></p> <p>This is a minor amendment to existing requirements to align the disclosures with the Fibre IMs and reflect the</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 8b(i) for Chorus Schedule 8(v) for ID-only regulated providers</p>

⁴⁰ [Fibre Input Methodologies \(Crown Financing and Individual Capex Design Proposal\) Amendment Determination 2024 \[2024\] NZCC 29](#) (21 November 2024).

<i>Final decision</i>	<i>Changes to determination and schedule templates¹⁰</i>
<p>updated calculation approach, where the annual benefit is determined on a daily basis and the daily values are summed to produce the annual total.</p> <p>Submissions on this proposed change were all in support.⁴¹</p>	

⁴¹ [*Chorus submission*](#) (2 September 2025), page 9.

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Wash-up accrual</p> <p><i>Disclosure group: Finance</i></p> <p><i>Amendment type: Removal of existing requirement</i></p> <p><i>Change from draft decision: No change from draft decision</i></p>	
<p><i>Final decision</i></p> <p>Our final decision is to remove the “wash-up accrual” line item from row 7 of Schedule 2(i) (Chorus), excluding it as part of regulatory profit.</p> <p><i>Why is change required?</i></p> <p>The current requirement is not aligned with Audit New Zealand’s latest guidance from April 2025.⁴² Based on the same guidance issued in May 2024, Chorus was granted an exemption in December 2024 from including wash-up accruals in regulatory income for DY2024 and DY2025.⁴³</p> <p><i>Reasons for final decision</i></p> <p>Our final decision:</p> <ul style="list-style-type: none"> - aligns the ID requirements with the latest guidance from Audit New Zealand, which advises that wash-up accruals should not be included in regulatory income due to uncertainty around recovery; and - allows for the same amount of information to exist in the public domain and so still meets the purpose of ID.⁴⁴ <p>Submissions on this proposed change were all in support.⁴⁵</p>	<p><u>Determination changes</u></p> <p>N/A</p> <p><u>Schedules</u></p> <p>Schedule 2(i): Regulatory Profit for Chorus</p>

⁴² Audit New Zealand: [Guidance for financial reporting by electricity distribution businesses in 2025](#) (22 April 2025).

⁴³ Commerce Commission: [Fibre ID Exemption Chorus Limited Wash-up Accruals](#) (18 December 2024).

⁴⁴ Ibid, paragraphs 18-20. This provides a detailed explanation on how the change meets the purpose of ID regulation.

⁴⁵ [Chorus submission](#) (2 September 2025), page 9.

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Pricing reporting aggregation</p> <p>Disclosure group: Prices</p> <p>Amendment type: Reduction of existing requirement</p> <p>Change from draft decision: Amended following consideration of stakeholder feedback</p>	
<p><i>Final decisions</i></p> <p>Our final decisions are:</p> <ol style="list-style-type: none"> 1) to reduce the reporting from monthly data to aggregated data covering a six-month period, in two six-monthly disclosures. If there is a change in pricing during the reporting period, this change and the month when it took effect will need to be noted in Schedule 14. As part of this amendment, we have also: <ul style="list-style-type: none"> - Clarified the applicable timeframes for certain disclosures in the footnotes of Schedules 24 and 25—for example, indicating whether the data reflects a point-in-time value or a most recent value over the six-month period. - Amended associated Average Revenue Per User (ARPU) and Connection number definitions to refer to the six-month reporting period rather than a single month. 2) for the first six-monthly disclosure to be due within three months of the end of the first DY half; and the second disclosure to be due within five months after the second DY half, with other annual disclosures. <p><i>Why is change required?</i></p> <p>Regulated providers have called for simplified pricing reporting to reduce the regulatory burden. Their suggestions included removing the requirement to report monthly data and reducing the frequency of disclosures.^{46, 47}</p>	<p><u>Determination changes</u> Clauses 2.3.4 and 2.4.5</p> <p>ARPU Connection Charge ARPU Monthly Charge Number of connections (closing) Number of connections (opening)</p> <p><u>Schedules</u> Schedule 24(i), (ii), and (iii) for Chorus</p> <p>Schedule 25(i), (ii), and (iii) for ID-only regulated providers</p>

⁴⁶ Enable: [Submission on Fibre ID amendments – process and issues paper](#) (27 March 2025), pages 1 and 2.

⁴⁷ Chorus: [Submission on Fibre ID amendments – process and issues paper](#) (27 March 2025), paragraphs 12.1 and 12.2.

Final decision	Changes to determination and schedule templates¹⁰
<p><i>Reasons for our final decisions</i></p> <p>Our final decisions:</p> <ul style="list-style-type: none"> - will decrease regulatory costs for the regulated providers; - strikes a proportionate balance between the costs and benefits of this disclosure, as relevant information is still available in a timely manner; and - still allows interested parties to assess trends in prices of different services and therefore can contribute to evaluations of whether regulated suppliers are passing on efficiencies to consumers or making excessive profits (ie, whether the purpose of Part 6 is being met). <p>Submissions on these proposed changes were all in support.^{48, 49} However, in a change from our draft decision, we are no longer proceeding with the draft decision to allow pricing disclosures to be aggregated to the FFLAS category level 3. While this amendment was supported in submissions, questions were raised about the feasibility of the change. Subsequent analysis revealed that the change would result in the loss of critical information. This would hinder stakeholders’ ability to assess pricing trends, evaluate efficiency gains, and monitor supplier profitability – key objectives under Part 6.</p> <p>However, we are proceeding with our draft decisions to shift from monthly to aggregated six-monthly reporting, and to defer disclosure due dates. We expect these changes will still provide a reduction in regulatory burden and deliver cost efficiencies for regulated providers.</p> <p>Key points raised in submissions, along with our responses, are provided in Appendix A.</p>	

⁴⁸ Northpower Fibre: [Submission on \[Draft\] Fibre Information Disclosure Amendment Determination 2025 and Fibre ID Amendments 2025 - Draft Decision - Reasons paper](#) (1 September 2025) (**Northpower Fibre submission**), page 2; [Chorus submission](#) (2 September 2025), page 9-11; [Tuatahi submission](#) (2 September 2025), page 3; and [Enable submission](#) (2 September 2025), page 4.

⁴⁹ Submissions from Chorus, Enable and Tuatahi also supported the draft decision to allow reporting against aggregated pricing categories. However, this amendment will not be adopted in the final decisions. Further detail is provided in Appendix A.

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Asset Management Maturity Assessment (AMMA)</p> <p><i>Disclosure group: Asset Management</i></p> <p><i>Amendment type: Reduction of existing requirement</i></p> <p><i>Change from draft decision: No change from draft decision</i></p>	
<p><i>Final decision</i></p> <p>Our final decision is to reduce the frequency of reporting of the Asset Management Maturity Assessment (Schedule 13) from annual disclosures to once every two years (biennial).</p> <p><i>Why is change required?</i></p> <p>We heard from regulated providers that AMMA reports do not significantly change year-to-year and the benefits of annual reporting do not outweigh the costs of compiling the reports.</p> <p><i>Reasons for final decision</i></p> <p>Asset management is an integral part of ensuring that regulated providers supply services at a quality that reflects the demands of end-users. Our final decision to reduce the frequency of AMMA reporting does not indicate that we consider asset management to be unimportant. On balance:</p> <ul style="list-style-type: none"> - We agree that changes to asset management capability typically require long lead-in times and an assessment of current practices, plans for making changes, and time to implement the changes to systems and processes that underpin business operations. Disclosures are less likely to change significantly on an annual basis and therefore are of limited value to interested parties. - While we continue to consider the AMMA a useful tool for understanding regulated providers' asset management maturity, there are potentially more effective methods of incentivising improvements in asset management that we could implement in place of annual AMMA reporting requirements.⁵⁰ - The benefits of requiring annual disclosures of the AMMA may not outweigh the costs to regulated providers 	<p><u>Determination changes</u> Clauses 2.3.1(21) and 2.4.2(16) (removal)</p> <p>Clause 2.3.1A and 2.4.2A</p> <p>Schedules 14 and 14A</p> <p>Schedule 18 a)</p> <p><u>Schedules</u> N/A</p>

⁵⁰ For example, providers publishing an asset management roadmap.

<i>Final decision</i>	<i>Changes to determination and schedule templates¹⁰</i>
<p>from producing the information.</p> <ul style="list-style-type: none"> - Reducing the disclosure frequency will lessen the regulatory burden and compliance costs on regulated providers while still providing sufficient information for interested parties to assess whether the part 6 purpose is being met. <p>Submissions on this proposed change were all in support.⁵¹</p>	

⁵¹ [Chorus submission](#) (2 September 2025), page 11; [Tuatahi submission](#) (2 September 2025), page 3; and [Enable submission](#) (2 September 2025), page 4.

Final decision	Changes to determination and schedule templates¹⁰
<p>Category: Asset Health</p> <p><i>Disclosure group: Asset Management</i></p> <p><i>Amendment type: Non-material amendment</i></p> <p><i>Change from draft decision: No change from draft decision</i></p>	
<p><i>Final decision</i></p> <p>Our final decision is to amend the definitions of H1-H5 to:</p> <ul style="list-style-type: none"> H5 – is an as-new asset condition rating – only normal maintenance required; H4 – is an asset condition rating where the asset has minor defects only, is serviceable, and only requires minor maintenance (5%); H3 – is an asset condition rating where significant maintenance (10- 20%) is required to return the asset to an accepted level of service; H2 – is an asset condition rating where renewal is required – significant renewal/upgrade required (20-40%); and H1 – is an asset condition rating where the asset is unserviceable – over 50% of asset requires replacement. <p><i>Why is change required?</i></p> <p>The descriptions were inserted in reverse order in the Fibre ID Determination.</p> <p><i>Reasons for the final decision</i></p> <p>This final decision corrects a known labelling error. Submissions on this proposed change were in support.⁵²</p>	<p><u>Determination changes</u> H1, H2, H3, H4, H5</p> <p><u>Schedules</u> N/A</p>

⁵² [Chorus submission](#) (2 September 2025), page 11; [Enable submission](#) (2 September 2025), page 5; [Tuatahi submission](#) (2 September 2025), page 3.

Final decision	Changes to determination and schedule templates¹⁰
<p>Typographical error corrections</p> <p><i>Disclosure group: Various</i></p> <p><i>Amendment type: Non-material amendment</i></p> <p><i>Change from draft decision: No change from draft decision + additional error corrections raised in submissions</i></p>	
<p>1) <i>Labelling - Schedule 3(ii) Disclosure of Permanent and Temporary Differences (Chorus and ID-only).</i> We have changed “In Schedule 14, Box 5 and Box 6, provide descriptions and workings of items recorded in the asterisked categories in Schedule 5a(i).” to “In Schedule 14, Box 5 and Box 6, provide descriptions and workings of items recorded in the asterisked categories in Schedule 3(i).”</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 3(ii)</p>
<p>2) <i>Formulaic error – Schedule 8 (ID-only)</i> RAB values excluding financial loss asset. We have updated the formulas in Cells F41 and F44 to correctly reflect RAB values excluding the financial loss asset.⁵³</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 8 for ID-only regulated providers</p>
<p>3) <i>Formulaic error – Schedule 11 (ID-only)</i> We have updated the formulas within the constant dollars table for “Non-network IT & support” and “Expenditure on assets”, as these were incorrectly not pulling through the relevant cost rows.</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 11 for ID-only regulated providers</p>
<p>4) <i>Formulaic error – Schedule 1a (Chorus) and minor amendment to defined term.</i> We have renamed the defined term “ROI – before benefit of crown financing” to “ROI – before benefit of crown financing adjustment”.</p>	<p><u>Determination changes</u> ROI – before benefit of crown financing</p>

⁵³ Tuatahi noted in [its submission](#) (page 3) that this error relates to cells F40 and F43, rather than F41 and F44. We would like to clarify the cell references pertain to the amended schedules published alongside the draft/final decisions paper.

Final decision	Changes to determination and schedule templates¹⁰
<p>We have amended the definition to “ROI – comparable to a vanilla WACC adjusted by adding back the annual benefit of crown financing treated as a year-end cashflow”.</p> <p>Correction of an error - the Internal Rate of Return (IRR) calculation in the Mid-Year ROI Calculation field updated to treat the Crown financing adjustment as a year-end cash flow, rather than a mid-year cash flow.</p>	<p>adjustment</p> <p><u>Schedules</u> Schedule 1a for Chorus</p>
<p>There was broad support from submitters for correcting the identified typographical errors.⁵⁴ In addition, three further error corrections were proposed, which we have reviewed and implemented. These are outlined below.⁵⁵</p>	
<p>5) <i>Formulaic error – Schedule 5a(i) (ID-only)</i> We have corrected the formulas in Cells: H12, H22, H23, H24, H34, H35, H36, H37, H38, and H39. These cells were previously not pulling the relevant cost allocation rows as intended.</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 5a(i) for ID-only regulated providers</p>
<p>6) <i>Formulaic error – Schedule 7 (ID-only)</i> We have added formulas in Cells G4, G5, G6, G8, and G9 to ensure the variance (%) is now calculated automatically, as intended.</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 7(i) for ID-only regulated providers</p>
<p>7) <i>Formulaic error – Schedule 11 (ID-only)</i> We have updated the formulas in Cells F69:K69 to correctly reference “cost of financing” rather than “site sustain”.</p>	<p><u>Determination changes</u> N/A</p> <p><u>Schedules</u> Schedule 11 for ID-only regulated providers</p>

⁵⁴ [Tuatahi submission](#) (2 September 2025), page 3; [Northpower Fibre submission](#) (1 September 2025), page 3; [Chorus submission](#) (2 September 2025), page 11.

⁵⁵ We have also made several additional amendments to make column descriptions more consistent and to correct minor grammatical errors.

Appendix A: Stakeholder views

Overall, the feedback received through submissions was generally supportive of the proposed changes outlined in the draft decision reasons paper, including the proposed implementation dates.⁵⁶ However, several submitters raised concerns about specific amendments or recommended additional changes, prompting reconsideration in some areas. Where submission feedback has either led to revisions to the draft decisions or has prompted clarifications, we have summarised the key submission points and our responses below.⁵⁷

Table 3: Submission feedback on the draft decisions and our response

What we heard	Our response
Category: Outages	
<p>Enable requested clarification of the following points related to our proposed changes:⁵⁸</p> <ul style="list-style-type: none">- that “identifying the connection” also means having the contact details of the customer; and- more detailed rationale behind the exclusion of “non-diverse transport services” <p>Enable also noted that the reporting requirements are based on Chorus’ PQP2 requirements and therefore recognised the limited scope for change.</p>	<p>We agree that “identifying the connection” in the context of a fault notification is not only restricted to the geographical location of that connection. This may not be sufficient in some cases. For example, if the regulated provider has to contact the end-user to complete the job. Consistent with industry practice, the intent of the “fault notification” definition is that the fault ticket is sufficiently complete so the regulated provider can constructively address the issue.</p>

⁵⁶ Submissions that supported the implementation dates include the [Chorus submission](#), page 3 and [Enable submission](#), page 5.

⁵⁷ No submissions were received on the issues we had either assessed as not requiring ID changes at this time, or had excluded from the scope of this review. These issues are outlined in Appendix B of the Draft Decision Reasons paper. See Commerce Commission: [Fibre Information Disclosure Amendments 2025 – draft decision reasons paper](#) (5 August 2025).

⁵⁸ [Enable submission](#) (2 September 2025), page 1.

What we heard

Our response

In terms of the exclusion for “non-diverse transport services”, this approach was initially carried over from the UFB contracts to PQP1 (and subsequently to PQP2).^{59,60} The PQP1 final decision reasons paper indicates that downtime arising from faults to “non-diverse transport services” should not count towards average unplanned downtime reporting.⁶¹

Consistent with the treatment of force majeure events, our decision for PQP1 to exclude this downtime suggests that the performance of a regulated provider should not necessarily be assessed against events that are outside of its reasonable control, at least in the short to medium term. We also indicated that, given the purpose of Part 6, additional investment in redundancy for transport services needs to be considered alongside the costs of doing so.⁶²

We have therefore retained the draft decision to exclude unplanned downtime caused by faults to “non-diverse transport services” from average unplanned downtime reporting. However, we may consider in future whether this exclusion best serves the purpose of ID.

As indicated in Table 2, upon reviewing the policy intent for this “non-diverse transport services” exclusion, we noticed that the associated downtime was not appropriately carved out from all relevant definitions used in the Report on Quality schedule template requirements. We have updated these requirements (defined terms) so this new exception is treated the same as the existing exception for force majeure events.

⁵⁹ Commerce Commission: [Chorus' Price-quality path from 1 January 2022 \(PQP1\) - Final decision reasons paper](#) (December 2021), page 238, para 7.181.

⁶⁰ Commerce Commission: [Chorus' Price-quality path for PQP2 – Final decision reasons paper](#) (December 2024), page 100-101.

⁶¹ Commerce Commission: [Chorus' Price-quality path from 1 January 2022 \(PQP1\) - Final decision reasons paper](#) (December 2021), page 238, para 7.180

⁶² Commerce Commission: [Chorus' Price-quality path from 1 January 2022 \(PQP1\) - Final decision reasons paper](#) (December 2021), page 238, para 7.181

What we heard	Our response
Category: Disclosure frequency of quality reports	
<p>While Northpower Fibre submitted that it had no issue with the increased disclosure frequency of quality reports, Chorus, Enable, and Tuatahi opposed the change.⁶³ They argued that the change would impose unnecessary compliance costs, increase workload, and create inconsistency with other regulatory regimes, which do not require part-year reporting.</p> <p>Chorus and Tuatahi considered that the purpose of Information Disclosure is to monitor long-term trends rather than address short-term issues.⁶⁴</p> <p>Enable also questioned the rationale that more frequent reporting would improve monitoring, indicating that quality performance is now stable and that time lags in comparing providers are not a significant issue.⁶⁵</p> <p>Chorus and Tuatahi raised concerns about requiring a technical expert to certify unaudited mid-year disclosures that will later be audited, citing potential discrepancies and compliance risks due to differences between technical and audit expertise.</p> <p>Enable and Tuatahi acknowledged that the Commission’s preferred option for less lagged information is the least costly among alternatives.</p>	<p>We acknowledge the concerns raised by Chorus, Enable, and Tuatahi regarding the proposed increase in reporting frequency for quality disclosures. We consider that the change will allow for more timely comparisons of information for stakeholders, given the lag in information under Fibre ID compared to the equivalent information in Part 4 ID-regulated sectors. As Telecommunications is a more dynamic market, any changes to quality performance within the fibre sector are likely to occur more rapidly compared to other Part 4 ID-regulated sectors.</p> <p>As stated in the draft decision reasons paper, to demonstrate the existing issue, if a stakeholder wanted to compare performance across all providers during the month of April 2024, it would not be until August 2025 (about 16 months later) that this information would be available for all four providers.⁷⁰ By comparison, under Part 4, Electricity Distribution Businesses annually publish their disclosures by 31 August for the disclosure year ending 31 March (within five months of the end of the year).</p> <p>We agree with Chorus and Tuatahi that the purpose of Part 6 generally and the ID purpose are focused on the long-term benefit of end-users. However, ‘long-term’ is relative (particularly given the dynamics of the Telecommunications market) and does not apply equally across all measures of the regulated providers’ performance. Monitoring the performance of regulated providers throughout the year will help ensure interested persons are across trends as they develop.</p>

⁶³ [Chorus submission](#) (2 September 2025), pages 3-5. [Enable submission](#) (2 September 2025), page 2. [Tuatahi submission](#) (2 September 2025), pages 1-2.

⁶⁴ [Tuatahi submission](#) (2 September 2025), page 1.

⁶⁵ [Enable submission](#) (2 September 2025), page 2.

⁷⁰ This is because the public disclosure due dates for April 2024 information are 30 November 2024 for Enable, 31 May 2025 for Chorus, and 31 August 2025 for Northpower Fibre and Tuatahi

What we heard

Submitters noted the following if six-monthly reporting were implemented:

- Chorus suggested that the mid-year report should be audited and published three months after the half-year to align with pricing disclosures.⁶⁶
- Northpower Fibre also suggested that the timing of the disclosure for the first six months aligns with the proposed changes to the intra-year disclosure for the Report on Pricing.⁶⁷
- Enable supported sign-off by a technical expert instead of director certification and audit assurance.⁶⁸
- Tuatahi recommended reviewing the necessity of this requirement after a few reporting cycles.⁶⁹

Our response

We recognise that, due to balancing the cost of compliance with accurate information, the intra-year disclosure may contain errors. While we expect the regulated providers to ensure this interim information is as accurate as possible, stakeholders should take reasonable care when using this information as it would be still subject to audit at year-end. The new mandatory explanatory notes disclosure requirement will help stakeholders (including regulated providers) understand any material variances.

As set out in our draft decision reasons paper, we considered alternative options and discounted an intra-year audit due to the potential cost of an additional audit engagement.⁷¹ While Chorus supported an additional audit engagement over the proposed approach, Enable supported technical expert certification. Tuatahi also recognised that our proposed approach to mid-year certification was less burdensome.⁷² Furthermore, in response to Chorus, the Report on Pricing disclosures require director certification but not audit assurance, so these disclosure requirements do not necessarily need to align in this regard.

As suggested by Northpower Fibre and Chorus, to ensure maximum process efficiencies are captured and to support cost considerations, we have changed the due date of this disclosure to align with the new due date of pricing disclosures.

⁶⁶ [Chorus submission](#) (2 September 2025), pages 4-5.

⁶⁷ [Northpower Fibre submission](#) (1 September 2025), page 2.

⁶⁸ [Enable submission](#) (2 September 2025), page 2.

⁶⁹ [Tuatahi submission](#) (2 September 2025), page 2.

⁷¹ Commerce Commission: [Fibre Information Disclosure Amendments 2025 – draft decision reasons paper](#) (5 August 2025), page 8.

⁷² [Tuatahi submission](#) (2 September 2025), page 1.

What we heard	Our response
Category: Provisioning reporting – Decision 1 – New measure for rescheduled appointments	
<p>Chorus expressed support for the amendment, and Northpower Fibre did not oppose the amendment.^{73,74}</p> <p>Enable opposed the amendment, stating that missed appointments performance has stabilised across industry.⁷⁵</p> <p>Tuatahi also opposed the amendment, stating that it sees limited value in extending the scope of [provisioning] reporting given the proportion of installations occurring in existing homes is decreasing compared to new builds.⁷⁶</p> <p>Enable also suggested that our rationale seemed to stem from Chorus’ customers’ concerns with its performance and therefore, any change should only apply to Chorus.⁷⁷</p>	<p>We acknowledge that the proportion of new connections requiring a site visit is declining and, therefore, the instances of missed appointments will also have declined. However, although missed appointments performance may have stabilised, it would be difficult for stakeholders to understand the extent of any underlying issue as there are no existing provisioning requirements on rescheduled appointments.</p> <p>Imposing requirements on only Chorus would also limit a stakeholder’s ability to compare performance across industry (whether end-users are receiving the performance they expect which includes considering how other regulated businesses are performing), thus detracting from the purpose of ID regulation.</p> <p>While the rescheduled appointments issue received attention during the setting of Chorus PQP2 path, it is not clear that the issue exists for only end-users served by Chorus. In consultation on a potential PQP2 provisioning quality standard, Spark indicated that rescheduled appointments were the key issue for “its customers” (ie, not specifying this only applies to end-users on Chorus’ network).⁷⁸ 2degrees supported this point in cross-submissions.⁷⁹ We also note that infrastructure businesses may have the same service companies carrying out the work (eg, Downer).</p>

⁷³ [Chorus submission](#) (2 September 2025), page 5.

⁷⁴ Per footnote 39, Northpower Fibre was broadly supportive of the draft decisions and did not provide an opposing view to this amendment. .

⁷⁵ [Enable submission](#) (2 September 2025), page 2.

⁷⁶ [Tuatahi submission](#) (2 September 2025), page 2.

⁷⁷ [Enable submission](#) (2 September 2025), page 2.

⁷⁸ Spark: [Commission draft decisions on Chorus' quality standards and revenue path for the second regulatory period](#) (15 August 2024), pages 2-3.

⁷⁹ 2degrees: [Chorus' Price-Quality Path for PQP2 \(2025-2028\): Commerce Commission 2degrees Cross Submission](#) (September 2024), page 3.

What we heard

Our response

The cost burden to implement any changes also appears to be relatively low as the effort should largely be repurposing information. The regulated providers are all signatories to the TCF’s “Code for the Installation of Fibre Telecommunication Services” (**Fibre Installation Code**),⁸⁰ and the code requires signatories to “record in their systems any rescheduled Agreed Appointment or Missed Appointments, including a reason.”⁸¹ We also note that none of the LFCs raised cost concerns with this amendment.

⁸⁰ NZ TCF: [Fibre Installation Code](#) (30 June 2023).

⁸¹ *Ibid*, clause 25.3.

What we heard	Our response
Category: Provisioning reporting – Decision 2 – Provisioning appointment definitions	
<p>Chorus and Tuatahi expressly opposed the proposed amendment to the definition of “number of missed provisioning appointments” to include confirmation that the end-user is not present.⁸² Enable was concerned on how this change might be audited.⁸³</p> <p>Chorus, Enable, and Tuatahi all indicated that this proposed definition is consistent with historical practice. However, submitters shared concerns around the cost of compliance, including auditable evidence.⁸⁴ Chorus stated that “to require affirmative evidence that this has been done for every appointment would be onerous and unworkable.”⁸⁵</p> <p>In its submission on the new rescheduled appointments measure, Chorus noted that reasons for a missed appointment should be moved to the definition of “rescheduled provisioning appointment.” Chorus also raised additional reasons as to why an appointment may be rescheduled.⁸⁶ Enable recommended that three of these reasons are also captured under the “rescheduled provisioning appointment” definition (faster service, weather, safety considerations).⁸⁷</p>	<p>Our response to the proposed change and its outcome are in Table 2 (not to proceed with the change).</p> <p>Consistent with feedback from Chorus and Enable, we have added new exceptions to what counts as a missed appointment. These are where an appointment has been moved to an earlier time (as agreed to by the end-user), or if the installer cannot reasonably complete the provisioning task due to safety considerations (such as extreme weather or aggressive animals).</p> <p>We have also moved all exceptions from the definition of “missed provisioning appointment” to “rescheduled provisioning appointments” (alongside the new exceptions) to help ensure the definitions work together as intended.</p>

⁸² [Chorus submission](#) (2 September 2025), page 6 and [Tuatahi submission](#) (2 September 2025), page 2.

⁸³ [Enable submission](#) (2 September 2025), page 3

⁸⁴ At [82]. [Enable submission](#) (2 September 2025), pages 2-3

⁸⁵ [Chorus submission](#) (2 September 2025), page 6.

⁸⁶ [Chorus submission](#) (2 September 2025), page 5.

⁸⁷ [Enable submission](#) (2 September 2025), page 2.

What we heard	Our response
Category: Provisioning reporting – Decision 3 – Shifting missed appointments reporting	
<p>Enable expressed support and Northpower Fibre did not oppose the amendment.⁸⁸</p> <p>Tuatahi opposed this change in submissions as it does not currently report this way, and it considered that regional level reporting would provide the insights that the Commission is looking for.⁸⁹ Upon clarification via email, Tuatahi staff indicated that Tuatahi currently reports internally at a regional level that does not strictly align with the geographic areas under ID (POI areas). Therefore, an additional cost would be incurred to transform the information into the proposed reporting format.⁹⁰</p> <p>Chorus did not oppose the change but highlighted the risk of reporting not being statistically robust due to the smaller sample size.</p>	<p>We acknowledge that this change will mean additional effort for Tuatahi to comply with geographic area reporting under ID (POI areas). However, reporting at the POI area level is consistent with other measures across ID, including provisioning. Reporting at the same level for missed appointments will allow stakeholders to make useful comparisons across the different measures.</p> <p>We also draw attention to our consultation on geographic differentiation when first setting the ID requirements. In adopting geographic differentiation by POI area, we ultimately considered that the benefits of reporting at this level outweighed the overall cost (including to transform internal reporting into a more useful format for stakeholder comparisons).</p>

⁸⁸ Per footnote 39, Northpower Fibre was broadly supportive of the draft decisions and did not provide an opposing view to this specific amendment.

⁸⁹ [Tuatahi submission](#) (2 September 2025), page 2.

⁹⁰ Email from Tuatahi staff, dated 11 October 2025.

What we heard	Our response
Category: Defined service for network performance testing – Decision 1 – Reference bitstream service	
<p>All submitters recommended that the ‘reference Bitstream service’ should be defined as a 500/100 service, consistent with the recent exemption issued to the regulated providers.</p> <p>Chorus provided assurance the Commission should not be concerned about the thresholds requiring adjustment.⁹¹ Chorus states that the performance metrics (ie, threshold measures) are specified in Chorus’ Bitstream service level terms and must be delivered across all applicable products. Chorus also states that “the traffic thresholds set out in Table 2 of Schedule 22 are not related to the speed of the service.”⁹²</p> <p>Enable also considers that the current thresholds are appropriate. Enable states that although frame delay will not change much (one of the three threshold measures), the greater headroom and improved handling of bursty traffic means jitter (frame delay variation) and frame loss ratio are better managed.</p> <p>Northpower Fibre noted that retaining a 2.5 Mbps CIR on the reference service means thresholds would not require adjusting.</p>	<p>As indicated in Table 2, we have defined the reference Bitstream service as a 500/100 service and we agree that a change to the test thresholds is currently not required. However, depending on how quickly technology changes and any further increases in speeds to the Bitstream reference service, these thresholds may need to be revised in the future.</p> <p>Consistent with Enable’s view, we consider that an increase in the speed of reference service means frame delay variation and frame loss can be handled better. As such, in theory, the speed of the reference service may have some impact on reported performance. Having considered Northpower Fibre’s view, we agree that maintaining a CIR on the reference Bitstream service will help significantly limit this impact as the guaranteed throughput will be measured.</p>

⁹¹ [Chorus submission](#) (2 September 2025), page 7.

⁹² Ibid, page 8.

What we heard	Our response
Category: Defined service for network performance testing – Decision 2 – Definitions of CIR and EIR	
<p>Chorus opposed the proposed definitions for EIR and CIR.⁹³ Chorus states that some of its services are in the low-priority traffic class yet have a CIR attached. Chorus recommended defining traffic classes instead and referred to the TCF whitepaper for definitions. Enable also suggested alignment with the TCF whitepaper.⁹⁴</p>	<p>As indicated in Table 2, the intention of the proposed change was to define traffic-related terms (EIR and CIR) in alignment with industry definitions for the traffic itself (ie, high or low priority) and not the priority traffic classes. This is consistent with the existing requirement of 2.5 Mbps CIR attached to the reference Bitstream service. While we had not intended to define priority traffic classes, we recognise that this distinction could have been clearer in the draft decision reasons paper.</p> <p>We therefore consider that the proposed definition of CIR is consistent with the definition of CIR in the TCF whitepaper (ie, CIR = discard ineligible). To avoid any unintended confusion, we have refined the proposed definition further so it more clearly aligns with the TCF whitepaper and as noted in Table 2, we have not proceeded with defining EIR.</p>
Category: Defined service for network performance testing – Future-proof requirement	
<p>Chorus, Enable and Tuatahi all recommended including a future-proof mechanism.</p> <ul style="list-style-type: none"> - Enable and Tuatahi suggested a less prescriptive requirement within the determination.⁹⁵ For example, Enable suggested:⁹⁶ <i>“The reference service can be changed on agreement of all LFCs and the Commission, if service being used by most residential end-users changes and all LFCs are offering this service.”</i> - Chorus suggested including a more prescriptive requirement within the “reference Bitstream service” 	<p>While we have decided against proceeding with such a mechanism at this time, we appreciate the options provided by the regulated providers.</p>

⁹³ [Chorus submission](#) (2 September 2025), page 8 and [Northpower Fibre submission](#) (1 September 2025), page 2.

⁹⁴ [Enable submission](#) (2 September 2025), page 5.

⁹⁵ [Tuatahi submission](#) (2 September 2025), page 2.

⁹⁶ [Enable submission](#) (2 September 2025), page 3.

What we heard	Our response
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definition:⁹⁷ “[...] including where such service is “boosted” to a higher speed profile by the LFC such that the boosted speed is or can be made available to the end users on the relevant service without migrating to another service or plan”

Category: Pricing reporting aggregation	
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All submitters supported the proposed amendments related to pricing reporting aggregation. However, some sought clarification on how pricing disclosures should be completed following aggregation to Category 3 FFLAS. Chorus interprets the draft decision as extending this aggregation to related schedules on incentives and service availability and recommends removing columns such as Category 4 and service description that would no longer provide meaningful information. If these columns remain, Chorus interprets disclosures like service description and list price would be disclosed only as “Varies.”⁹⁸

Enable echoed this view, noting that list price and incentive columns should be removed due to their incompatibility with aggregation, and said their pricing information is already publicly available.⁹⁹

Northpower Fibre requested clarification on whether public disclosures should reflect aggregated Category 3 FFLAS data, while service-level revenue disclosures to the Commission should remain unchanged and continue to be reported at the Category 4

After considering submissions from Chorus and Enable on their interpretation of how pricing disclosures would be completed following aggregation to Category 3 FFLAS, we identified several concerns with the practical implementation of aggregation at this level.

In particular, we are concerned that aggregating to Category 3 FFLAS would result in the loss of important information—such as service-level pricing, service availability, and incentives. Without this level of detail, interested parties would be unable to effectively assess pricing trends across different services. This, in turn, would limit their ability to evaluate whether regulated suppliers are passing on efficiency gains to consumers or earning excessive profits (i.e. whether the purpose of Part 6 is being met).

As a result, we have decided not to proceed with the draft decision that would have allowed pricing reporting aggregated to Category 3 FFLAS.¹⁰² While this proposed amendment is not being implemented at this time, we continue to see potential for pricing reporting aggregation in a different form. We will monitor the effectiveness of current pricing disclosures and may revisit this issue in a future ID review.

⁹⁷ [Chorus submission](#) (2 September 2025), page 7.

⁹⁸ [Chorus submission](#) (2 September 2025), page 10.

⁹⁹ [Enable submission](#) (2 September 2025), page 4.

¹⁰² Commerce Commission: [Fibre Information Disclosure Amendments 2025 Draft Decision - Reasons paper](#) (5 August 2025), page 20.

What we heard

FFLAS level.¹⁰⁰

In relation to the amendment to go from monthly to six-monthly aggregated pricing reporting, Chorus recommended clarifying clause 2.3.4 to refer to the first and second halves of the disclosure year, rather than specifying quarters. They noted this would help avoid confusion and ensure alignment with the new reporting frequency.¹⁰¹

Our response

In relation to Northpower Fibre's submission, our final decisions on pricing reporting apply to both public disclosures and those made to the Commission.

In response to Chorus's submission requesting clarification of clause 2.3.4, we have amended clauses 2.3.4(1) and (2) to refer to the first and second **half** of the disclosure year, rather than quarters. This change aligns with the move to six-monthly pricing reporting and helps ensure clarity of the requirement. The same amendment has been applied to clause 2.4.5(1) and (2), which is the equivalent clause for ID-only providers.

¹⁰⁰ [Northpower Fibre submission](#) (1 September 2025), page 2.

¹⁰¹ [Chorus submission](#) (2 September 2025), page 10-11.

Appendix B: Glossary

Term/Abbreviation	Definition
AMMA	Asset Management Maturity Assessment
CIR	Committed Information Rate
DY	Disclosure Year
EIR	Excess Information Rate
FFLAS	Fibre Fixed Line Access service
ID	Information Disclosure
regulated provider	means a person who is prescribed in regulations made under s 226 of the Act as being subject to information disclosure regulation
ID-only regulated providers	means a person who is prescribed in regulations made under s 226 of the Act as being subject to information disclosure regulation, but excludes Chorus
IM	Input Methodologies
LFCs	Local Fibre Companies
POI	Point of Interconnection
PON	Passive Optical Network
PONFAS	Passive Optical Network Fibre Access Service
PQ	Price-Quality
ROI	Return on Investment
RSP	Retail Service Provider

Appendix C: Associated documents

Publication date	Reference	Title
30 November 2021	-	Fibre Information Disclosure Determination 2021[2021] NZCC 24.
30 November 2021	978-1-869459-58-1	Fibre Information Disclosure Final Decisions Reasons Paper
28 July 2022	-	Fibre Information Disclosure Amendment Determination 2022 [2022] NZCC 26
22 November 2023	-	Fibre Information Disclosure (Non-material) Amendment Determination – November 2023 [2023] NZCC 30
3 April 2024	-	Fibre Information Disclosure (Non-material) Amendment Determination – April 2024 [2024] NZCC 4
27 Feb 2025	978-1-991287-08-3	Fibre Information Disclosure Determination 2021 [2024] NZCC 4 - consolidated principal determination and all amendments as of 1 May 2024.
5 August 2025	978-1-99-133280-6	Fibre Information Disclosure Reviews – Draft Framework paper
5 August 2025	978-1-99-133285-1	Fibre ID Amendment 2025 – Notes from Working Group on Outages