

**Submission on
Resilience Principles:
Decision-making
frameworks for
critical infrastructure
providers – Draft
guidance**

14 August 2026

C H ● R U S

Introduction

1. Chorus welcomes the opportunity to comment on the Commerce Commission's draft guidance document, *Resilience Principles: Decision-making framework for critical infrastructure providers (Draft Guidance)*.¹
2. Chorus operates New Zealand's largest open-access fibre network. We provide wholesale connectivity services that underpin broadband and digital services for homes, businesses, public services, and critical services. Our assets include cables, ducts, poles, network buildings, network electronics and IT systems.
3. Resilience is central to Chorus' role as operator of nationally significant telecommunications infrastructure. New Zealanders increasingly rely on fibre connectivity for work, education, business, public services, emergency response, health services, and social connection. Protecting our assets, and maintaining and restoring connectivity during disruptive events, is therefore a core part of Chorus' operational and investment planning.
4. Chorus' fibre network is inherently resilient in a number of important respects. Fibre is less susceptible to many forms of degradation and interference than legacy broadband technologies, supports high-capacity and highly reliable connectivity, and route diversity and redundancy reduce the impact of single points of failure. Chorus further strengthens that resilience through network architecture, restoration capability, operational readiness, spares management, and lifecycle planning. In practice, resilience is also embedded throughout our asset management frameworks, network planning, technology, and service decisions, rather than only being addressed discretely by way of resilience-specific projects.
5. Chorus operates within a broader infrastructure system and both depends on, and supports, other essential services. Electricity supply, road access, emergency management coordination, third-party infrastructure, technology platforms, and contractor availability can all affect service continuity and restoration. Chorus therefore supports a collaborative and structured approach to resilience decision-making, provided that approach remains proportionate, practical and aligned with sector context.
6. The Draft Guidance matters to Chorus because it signals how the Commission may assess resilience-related expenditure proposals over time, particularly where Chorus proposes material expenditure in a price-quality (**PQ**) context. Chorus supports the objective of improving infrastructure resilience planning and investment decision-making.
7. Our main concern is practical application. The Draft Guidance states that it is guidance, not an immediate requirement, and that analysis should be proportionate to the scale, cost, uncertainty and consequences of the investment. Those features are important and should be retained. However, the final guidance should more clearly explain how that non-binding and proportionate approach will be preserved in practice.

Executive summary

8. Chorus supports the Commission taking a proactive and constructive approach to understanding resilience risks in regulated infrastructure sectors. The Draft Guidance identifies many relevant issues. Chorus agrees, for example, that:
 - 8.1. resilience should be integrated into ordinary asset management, risk management, governance, organisational capability, and investment planning
 - 8.2. resilience is broader than physical asset hardening
 - 8.3. resilience is distinct from reliability

¹ Commerce Commission, [Resilience Principles: Decision-making framework for critical infrastructure providers](#), 3 July 2026.

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- 8.4. resilience decision-making should increasingly reflect a wider understanding of impacts, uncertainties, and interdependencies, and
 - 8.5. maturity in resilience practice will develop over time and should be proportionate to context.
 9. However, any Commission role in this area must remain firmly anchored to its statutory mandate and existing regulatory functions. The Commission's role is not merely guided by legislation; it is defined and constrained by it. Resilience considerations may be relevant where they bear on the Commission's statutory objectives, including promoting the long-term benefit of end-users through regulatory settings that support outcomes consistent with workably competitive markets. But the Commission's role, and the guidance, should not be framed or applied in a way that creates new regulatory purposes, approval tests, reporting obligations, or compliance expectations by implication.
 10. If applied too literally or broadly, the Draft Guidance may be too cumbersome in practice for the types of resilience-related investment decisions Chorus would often be considering. In particular, the guidance appears more naturally suited to larger, dedicated resilience proposals than to smaller, routine, or integrated investments where resilience is one of several drivers.
 11. We are also concerned about the risk of unintended consequences. Resilience investment is often made under uncertainty. An investment may be prudent and efficient when assessed ex ante, even if the hazard or event it is designed to mitigate does not ultimately occur. The final guidance should recognise this feature of resilience investment and avoid requiring a level of certainty or evidential precision that is not realistic at the time investment decisions are made. If the evidential and process burden associated with resilience expenditure becomes too high, the guidance may discourage the very investment it is intended to support, especially where the investment is modest, incremental, or integrated within broader network, lifecycle, or service decisions. That would be a poor policy outcome.
 12. We recommend the final guidance:
 - 12.1. **better explain its practical status and proportional application**, including how it will avoid becoming a default evidential benchmark and how "materiality" and "significance" thresholds will be applied in practice
 - 12.2. **be sufficiently flexible to accommodate different sector contexts**, including telecommunications and fibre networks, recognising integrated and multi-benefit investment, provider judgement, and programme or system-level resilience outcomes
 - 12.3. **better explain how it is intended to operate alongside existing expenditure assessment settings**, without creating a parallel resilience approval framework
 - 12.4. **set more practical expectations around consultation, willingness-to-pay and risk tolerance evidence, interdependencies, effective collaboration, and information-sharing**, including in a wholesale fibre access and geographically consistent pricing context, and
 - 12.5. **recognise existing provider frameworks and maturity pathways**, including that providers may already meet much of the intent of the guidance through existing asset, risk, criticality and resilience processes, while continuing to mature over time.
 13. We respond directly to consultation questions in the **Appendix**.

Submission

The final guidance should more clearly explain practical status and proportional application

14. Chorus supports the Commission providing high-level guidance on matters that may inform good resilience investment decision-making. The Draft Guidance's four-stage framework (understanding the risk, evaluating impacts, designing mitigation options, and investment decision-making) is a useful way to organise those matters.
15. Chorus also supports the position stated in the Draft Guidance that it is guidance rather than an immediate requirement, and that expected analysis should be proportionate to the scale, cost, uncertainty and consequences of the investment. Those statements are important and should be retained.
16. However, the final guidance should explain more clearly how that status will be preserved in practice. This matters because the Draft Guidance also signals that PQ-regulated businesses seeking approval for resilience expenditure will need to demonstrate systematic and robust resilience planning and investment decision-making, particularly where material expenditure is proposed. The Draft Guidance states:²

As resilience investment planning matures, all of the [resilience principles for investment decision making] should be evident and the concepts considered in more detail. We expect this transition to more mature practice to occur within a reasonably short timeframe, with a clear direction of travel toward full application of these principles.

17. Chorus is concerned that, in practice, statements of this kind could cause the guidance to operate as a de facto evidential benchmark, even if it is not formally binding. The final guidance should therefore make clear that it is not intended to operate as:
 - 17.1. a rigid checklist
 - 17.2. an effective prerequisite for resilience expenditure approval
 - 17.3. a default benchmark against which all resilience-related proposals are assessed, or
 - 17.4. a platform for broader resilience process regulation or compliance expectations.
18. We note the Commission's intention to take a broader role in resilience matters across the infrastructure sectors it regulates. Resilience is clearly important, and the Commission has a legitimate interest in resilience-related matters where they are relevant to the performance of its statutory functions. However, any resilience-related role must remain firmly within the scope of the Commission's statutory mandate. The Commission's powers, functions, and objectives are prescribed by Parliament and should be exercised for the purposes set out in the relevant legislation.
19. The Commission's primary focus should remain on ensuring that regulatory settings create the right incentives for suppliers to make efficient resilience investments over time. In that context, the final guidance should clarify that the Commission's resilience-related activities are directed to supporting its existing statutory objectives and functions. The guidance should not create additional regulatory purposes, approval requirements, reporting obligations, or process expectations by implication.

Proportionality should apply to both relevance and depth

20. Chorus considers the treatment of proportionality in the Draft Guidance should be strengthened. In particular, the Draft Guidance states that the principles:³

² At paragraph 2.5.

³ At paragraph 1.3.

...all apply in every case, just to different extent – with the level of expected analysis proportionate to the scale, context and materiality of the investment being considered.

21. This formulation is too broad. It risks turning proportionality into a question only of how much analysis each principle requires, rather than whether a principle is relevant or material to the decision at all.
22. In our view, proportionality should apply to both:
 - 22.1. which principles are relevant and material to the decision, and
 - 22.2. the depth of analysis, modelling, engagement, and evidence expected for those principles.
23. For smaller, routine, or integrated investments, some principles may have limited practical relevance. In those circumstances, providers should be able to exercise reasonable judgement about which principles are material in context. Providers should not need to undertake artificial analysis or engagement simply to demonstrate that every principle has been touched on.

The guidance should not discourage efficient resilience investment

24. Chorus is particularly concerned that, if applied too rigidly, the guidance could unintentionally discourage efficient resilience investment. For larger, dedicated resilience proposals, a more detailed framework may be appropriate. But applying the same level of process to smaller, routine, or integrated investments would often be excessive.
25. That is not just a question of administrative burden. If the cost and effort required to justify relatively modest resilience measures becomes too high, providers may become less likely to put those measures forward at all. Chorus considers that would cut against the objective of improving resilience decision-making and resilience outcomes.
26. The final guidance should therefore make clear that:
 - 26.1. lighter-touch but well-reasoned evidence may be sufficient for smaller or integrated investments
 - 26.2. more intensive analysis and engagement should generally be reserved for material, novel, highly uncertain, or primarily resilience-driven proposals, and
 - 26.3. the guidance is intended to support sensible provider decision-making, not to layer process requirements onto comparatively modest investments.
27. Resilience investment also differs from some reliability or replacement expenditure because the benefits may depend on uncertain future events. A resilience investment may be prudent and efficient when it is assessed at the time of the decision, even if the relevant hazard or disruption does not occur. This reinforces the need for proportionate evidence requirements, transparent trade-off analysis, and recognition that resilience investments may be intended to reduce future risk rather than deliver certain immediate benefits.

Materiality and significance need clearer treatment

28. The Draft Guidance relies on concepts such as “material” or “significant” expenditure, but gives limited practical assistance on what those terms mean in practice.
29. Chorus recommends that the final guidance provide clearer guidance, or at least more worked examples, showing how the Commission would interpret “material” or “significant” expenditure, and what level of analysis it would expect for:
 - 29.1. small or routine investments
 - 29.2. medium-scale integrated or multi-benefit investments, and
 - 29.3. larger dedicated resilience proposals.

30. That would significantly improve the usability of the guidance and make the proportionality principle more meaningful in practice.

The final guidance should be sufficiently flexible to accommodate different sector contexts, including fibre networks

31. Chorus recognises that the Draft Guidance is intentionally cross-sector. It cannot and should not prescribe detailed sector-specific approaches. However, that reinforces the importance of the final guidance being sufficiently flexible to accommodate different ways of delivering resilience across sectors.
32. The Draft Guidance appropriately recognises that resilience is broader than physical asset hardening. The final guidance should retain that broad framing and ensure its examples and indicators remain illustrative. They should not imply that asset hardening, local consultation or project-specific analysis is the default model in every sector or for every investment.

Resilience is often integrated, not standalone

33. In Chorus' context, resilience is often one of several drivers of an investment decision, rather than a neat standalone category. A single investment may simultaneously address lifecycle renewal, route selection, network architecture, technology evolution, capacity, service continuity, restoration capability, and resilience to hazards or future events.
34. It is not always meaningful or efficient to isolate a distinct "resilience spend" component and subject it to a separate full resilience justification process. In many cases, resilience is embedded in a broader decision about what Chorus should build, replace, relocate, or reconfigure in order to deliver the best long-term outcome for end-users and the network as a whole. For example, a route relocation or replacement decision may be driven by a combination of asset condition, access constraints, capacity, future demand, restoration considerations and exposure to hazards. In that context, resilience may be part of the overall investment rationale, but it may not be meaningful or proportionate to isolate a standalone resilience component.
35. Chorus therefore recommends that the final guidance state more clearly that:
- 35.1. not all investments with resilience benefits should be treated as standalone resilience proposals
 - 35.2. where resilience is the primary driver, or where resilience benefits are central to the investment case, fuller application of the guidance may be appropriate
 - 35.3. where resilience is one of several material drivers, providers should be able to assess the investment through a broader investment framework, with the depth of resilience-specific analysis proportionate to the role resilience plays in the decision
 - 35.4. providers should not be expected to artificially disaggregate resilience benefits where doing so would be impractical, unreliable, or disproportionate, and
 - 35.5. resilience decisions may involve enhancing, relocating, reconfiguring, or redesigning assets and services, not only replacing critical assets.

Programme-level and service-level resilience matter more than isolated asset-level analysis

36. Chorus is concerned that parts of the Draft Guidance could be read as leaning too heavily toward a project-by-project or localised asset lens. For a national fibre network, resilience outcomes are often best understood at a service, programme, or system level.
37. End-users generally care whether connectivity is maintained or restored, not whether a particular duct, fibre cable, pole, or building remains unaffected by a hazard event. For Chorus, resilience may be delivered through network architecture, route diversity, traffic routing, failover, restoration capability, operational preparedness, spares strategy, backup power,

technology choices, and service design, rather than only through hardening specific physical assets.

38. The final guidance should more clearly recognise that:

38.1. resilience decisions may be made at a programme or system level

38.2. resilience outcomes may arise from the combined effect of multiple projects and network decisions, and

38.3. a narrow project-by-project or asset-isolated approach may not capture the relevant resilience logic well.

The guidance should preserve provider expertise

39. Chorus considers it important that the final guidance preserve the role of provider expertise and judgement. Resilience decisions depend on operational, engineering, and network knowledge, including asset condition, route diversity, restoration constraints, field force capability, access, technology evolution, and deliverability. The Commission's role is appropriately to assess whether expenditure decisions are prudent, efficient, and supported by reasonable evidence; it should not inadvertently displace provider judgement on matters that depend on operational, engineering, and network expertise.

40. The final guidance should support providers to identify the best resilience solution for end-users and the network as a whole, not push providers toward asking what form of business case or solution is most likely to satisfy the regulator.

The final guidance should explain how it is intended to operate alongside existing expenditure assessment settings

41. The Draft Guidance is especially relevant to Chorus and other PQ-regulated providers because it signals how the Commission may assess resilience-related expenditure proposals over time in existing expenditure approval settings.

42. Chorus recommends that the final guidance explain more clearly how it is intended to operate alongside existing expenditure assessment processes. In particular, the final guidance should make it clear that it is intended to support, rather than displace or duplicate, existing assessment frameworks.

43. This is important because many investments may improve reliability, resilience, service quality, capacity and performance at the same time. The final guidance should not encourage artificial categorisation where investment drivers are integrated, nor imply a new parallel resilience approval framework sitting alongside established expenditure assessment mechanisms.

44. More generally, Chorus considers the final guidance should explain that:

44.1. resilience should increasingly be treated as part of ordinary prudent and efficient planning and decision-making

44.2. that does not mean all resilience-related expenditure should be subject to the same formal evidential expectations, and

44.3. the Commission should continue to assess expenditure through existing statutory and regulatory frameworks, informed by the guidance where relevant and proportionate.

The final guidance should set practical expectations for consultation, willingness-to-pay evidence, interdependencies, and information-sharing

45. Chorus supports effective engagement, collaboration and information-sharing where this improves resilience outcomes. Our concern is not with engagement itself, but with ensuring expectations are proportionate, targeted, and make use of existing channels where appropriate. This is particularly important where the guidance is applied to national infrastructure providers and to investments that are programme-level, integrated, or not primarily driven by resilience.

Consultation and willingness-to-pay should be applied carefully

46. Chorus supports the Draft Guidance's emphasis on understanding consumer and community impacts, risk tolerance, and engagement where those matters are material and relevant. There is value, for example, in providers understanding how outages affect communities and users, and where vulnerabilities may be most acute.
47. However, the final guidance should not treat local willingness-to-pay testing as a default or determinative evidential requirement for resilience investment decisions. Chorus recognises that willingness-to-pay evidence can be useful in some contexts, particularly where investment benefits, beneficiaries, and cost recovery are relatively clear. But in Chorus' context, it may be of limited usefulness for several reasons.
48. First, Chorus is a wholesale provider and does not have a direct retail relationship with end-users. Retail service providers, service plans, alternative technologies, and broader market choices mediate how end-users experience, value, and pay for connectivity.
49. Secondly, local or project-specific willingness-to-pay testing for resilience investment may not map neatly to how costs are recovered or borne. That is particularly important where resilience costs and benefits are distributed across the network, or where resilience is delivered through network architecture rather than a strongly localised asset.
50. In those circumstances, willingness-to-pay evidence may be less informative than the Draft Guidance appears to assume. Willingness-to-pay evidence may be useful in some contexts, but should be treated as one input only. Other evidence of customer impacts, risk tolerance, risk-bearing capacity, acceptable service consequences and expert assessment may be more relevant depending on the investment and regulatory context. Chorus therefore recommends that the final guidance:
- 50.1. recognise that willingness-to-pay evidence may be relevant in some contexts, particularly where investment benefits, beneficiaries and cost recovery are more readily identifiable, but is not central or determinative in all sectors or regulatory settings
 - 50.2. enable providers to rely on other decision inputs and evidence where willingness-to-pay testing is not well suited to the way pricing and cost recovery works in practice, and
 - 50.3. avoid creating a situation where local consultation is treated as the starting point for all resilience-related investment decisions.
51. More generally, Chorus considers consultation expectations should be proportionate and practical. For a national telecommunications provider, engagement at a programme, principles, or existing coordination-channel level may often be more appropriate than repeated local consultation for individual projects.

Interdependencies and information-sharing need practical boundaries

52. We agree that interdependencies matter. The Draft Guidance's treatment of physical, cyber, geographic, and logical interdependencies is useful, and we agree that material dependencies and wider service consequences are part of good resilience decision-making.
53. However, the final guidance should provide more practical clarity on:

- 53.1. how far individual providers should go in assessing downstream impacts on other infrastructure or services
 - 53.2. what level of evidence would be proportionate
 - 53.3. how providers should deal with incomplete information from other sectors
 - 53.4. how providers should treat dependencies that are reciprocal or outside their control, and
 - 53.5. how providers should manage information sensitivity, data governance, commercial issues, and security requirements.
54. We also consider interdependencies should be framed as a two-way issue. Chorus' decisions may affect others, but other providers' decisions, information, and resilience planning may also affect Chorus. The final guidance would be improved by recognising that resilience coordination is not only about downstream consequence mapping by one provider, but also about wider cross-sector coordination and upstream decision-making.
55. Chorus supports appropriate information-sharing and coordination where it improves resilience outcomes. However, providers should not be expected to disclose sensitive network, vulnerability, dependency, or restoration information in ways that could undermine security or commercial confidentiality.
56. The final guidance should therefore make clear that providers may appropriately rely on, and contribute to, existing Lifelines, emergency management, sector coordination, and related mechanisms, rather than being expected to create bespoke engagement arrangements around each individual investment.
57. The Draft Guidance would also benefit from clearer examples of what "effective collaboration" means in practice. For a national infrastructure provider, effective collaboration may include participation in existing Lifelines, emergency management, local authority, sector and cross-infrastructure forums, rather than bespoke engagement for each investment decision. Clearer expectations would assist providers to understand what evidence of collaboration is expected, while avoiding duplicative or inefficient engagement processes.

The final guidance should recognise existing frameworks, maturity pathways, and asset criticality

58. We agree with the Draft Guidance's recognition that providers are at different stages of maturity and that mature resilience practice will develop over time. That is an important feature of the document and should be retained.
59. We also agree that clearly defined asset criticality is an important input into resilience decision-making, particularly for significant resilience investments. Asset criticality helps providers understand the consequences of asset failure, prioritise investment, and link asset-level decisions to service-level outcomes. Chorus uses embedded frameworks that support a consistent approach to assessing asset health, criticality, and risk across our asset portfolios and IT domains. These frameworks support assessment of probability of failure, consequence of failure, and overall asset risk, and help inform investment prioritisation and renewal decisions over time.
60. The final guidance should recognise the role of existing provider frameworks, including asset management, risk, criticality, resilience, business continuity, and planning documents already in use. These frameworks should be built on where they are fit for purpose, rather than implying providers need to create wholly new resilience processes from scratch.
61. Many of the concepts reflected in the Draft Guidance are already familiar and are reflected, at least in part, in existing Chorus practice, particularly in relation to asset management, criticality, strategic planning, and risk. At the same time, the Draft Guidance points toward areas where greater maturity, stronger evidence, or more systematic application may be needed over time, particularly in relation to:

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- 61.1. external inputs and place-based information
 - 61.2. interdependencies and downstream impacts
 - 61.3. more systematic and repeatable application across the business
 - 61.4. explicit treatment of broader community and consumer consequences in some contexts.
62. We consider these matters are best addressed through a maturity pathway and continuous improvement approach, not through the final guidance becoming a quasi-compliance framework.

Appendix: Responses to consultation questions

Commission question	Chorus response
Is the draft guidance clear about its purpose and practical status?	The Draft Guidance is reasonably clear that it is guidance rather than an immediate requirement. However, Chorus considers the final guidance should better explain how that status will be preserved in practice, particularly where the guidance may be used in expenditure assessment settings for PQ-regulated providers. The final guidance should also make clear that it is intended to support the Commission's existing statutory functions, not create new regulatory purposes, approval tests, reporting obligations, or resilience compliance requirements. It should not operate as a rigid checklist, default evidential benchmark, or effective prerequisite for approval of resilience-related expenditure. Clarity would also be improved if the Commission explained how this guidance fits with any further resilience work it intends to undertake.
Is it clear how the draft guidance should be applied proportionately across sectors with different levels of maturity?	Not sufficiently. The Draft Guidance recognises proportionality, but the final guidance should explain more clearly how proportionality applies in practice. In particular, proportionality should apply to: • which principles are relevant and material to the decision • the depth of analysis, modelling, engagement, and evidence expected • the scale, context, and materiality of the investment • whether resilience is the primary driver or one of several drivers • differences in sector and regulatory context, including telecommunications and fibre networks, and • differences between providers with national and regional footprints.
Are there implementation barriers, overlaps, or accountability issues in the wider resilience and regulatory landscape that may affect application in practice?	Yes. Potential issues include: • overlap with emergency management and emerging critical infrastructure cyber security resilience settings • practical boundaries around interdependencies and downstream impact assessment • confidentiality, security, and data governance constraints • uncertainty about what counts as "material" or "significant" resilience expenditure

	• potential duplication if bespoke engagement is expected where existing coordination mechanisms already exist, and • uncertainty about what “effective collaboration” means in practice. The final guidance should support existing regulatory and coordination frameworks, rather than creating parallel expectations. Any further Commission work in this area should remain within the Commission’s statutory mandate and be supported by clear problem definition, statutory basis, sector-specific analysis, and cost-benefit justification.
What areas should the Commission prioritise in further work?	Chorus considers the Commission should prioritise practical clarification of how the guidance will operate within existing expenditure assessment settings, including: • expenditure materiality and significance • integrated and multi-benefit investment • proportionate evidence expectations • interdependencies and information-sharing, and • consultation and collaboration expectations. Chorus would not support the guidance becoming a platform for broader resilience reporting, maturity assessment, performance regulation, or process compliance requirements without a clearly identified statutory basis and demonstrated end-user benefit.
Which aspects of the draft guidance are most helpful?	The most helpful aspects of the Draft Guidance are: • the structured four-stage decision-making framework • the recognition that resilience is broader than physical asset hardening • the distinction between resilience and reliability • the emphasis on system thinking, interdependencies, and asset criticality • the recognition that resilience should be integrated into ordinary planning and investment processes, and • the attempt to describe “what good looks like”.
Which parts are unclear, unnecessary, or could be improved?	The main areas for improvement are: • stronger and clearer guidance on proportionality and materiality • clearer treatment of integrated and multi-benefit investment

	• better accommodation of different sector contexts, including telecommunications and fibre networks • clearer expectations for what effective collaboration looks like in practice • more practical treatment of consultation, willingness-to-pay evidence, risk tolerance, risk-bearing capacity, interdependencies, and information-sharing, and • clearer explanation of how the guidance will sit within the Commission's existing statutory functions and expenditure assessment settings.
Are any principles missing, or are there areas of overlap?	The existing principles and examples should better recognise: • programme-level and system-level resilience • service outcomes rather than only asset-level impacts • integrated investment drivers • existing provider frameworks and maturity pathways, and • differences between providers with regional and national footprints. These points are likely best addressed by refining the current principles and examples, rather than adding further principles.
Are there any missing frameworks or evaluation tools that should be included or referenced?	Chorus does not have strong views on additional frameworks or tools. The more important point is that the final guidance should make clear that complex frameworks and tools are not the expected default for all providers or all investment decisions. The appropriate tool should depend on the scale, materiality, uncertainty, purpose, data quality and regulatory context of the investment.
To what extent do you already apply these principles in your resilience-related decision-making processes?	Chorus already applies many of the concepts reflected in the Draft Guidance through asset management, criticality, risk, planning, and resilience-related processes. However, the Draft Guidance also points to areas where greater maturity, stronger evidence, or more systematic application may be needed over time. These matters are best addressed through a maturity pathway and continuous improvement approach, rather than through the guidance becoming a quasi-compliance framework.
How should the framework recognise and reflect iwi, hapū, and Māori perspectives, including capability, resources, and relationships that support resilience, particularly in smaller or more isolated communities?	Chorus supports recognising iwi, hapū and Māori perspectives. The final guidance should emphasise that engagement should be proportionate, practical and place-based, and that providers should be able to use existing relationships and coordination channels where appropriate. Expectations should reflect the nature, scale and likely impact of the investment.

Which cross-sector vulnerabilities and interdependencies should the framework place the greatest emphasis on?	For Chorus, the most relevant interdependencies are likely to include: • electricity and backup power dependencies • road access, restoration, and route vulnerabilities • dependencies with wider infrastructure and service continuity systems • interactions with emergency management and restoration settings, and • where relevant, within-sector communications dependencies, including the availability and resilience of mobile, satellite, backhaul, and other alternative connectivity options. More generally, the framework should focus on interdependencies that are material to service continuity and recovery, while remaining realistic and proportionate about what individual providers can evidence, influence, or control. Data quality, information availability, and information sensitivity may also constrain the level of analysis that can reasonably be expected.
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