

STRIM

Strengthening Telecommunications Resilience in Mohua / Golden Bay

Submission on the draft Resilience Principles guidance

Resilience Principles: Decision-making framework for critical infrastructure providers

To: Commerce Commission — infrastructure.regulation@comcom.govt.nz

Subject: Submission: Draft Resilience Guidance Feedback

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Cover note

STRIM Group submits this feedback as a Golden Bay/Mohua community resilience initiative. STRIM — Strengthening Telecommunications Resilience in Mohua / Golden Bay — is a community-led initiative formed following repeated telecommunications outages, to understand local infrastructure dependencies and advocate for practical resilience improvements. Information about STRIM and our specific telecommunications situation can be found at www.strim.nz. This submission contains no confidential information and may be published in full.

1. Opening summary

STRIM supports the draft guidance and its direction and makes this submission to strengthen its practical application to isolated-community telecommunications resilience. We submit as a community resilience initiative, not as an infrastructure provider.

Golden Bay/Mohua has experienced repeated major telecommunications disruption after damage to the fibre route serving the Bay — three times since 2022. STRIM's outage history records a Birds Hill slip in 2022 and contractor damage in 2023. Public reporting records the July 2025 severed fibre at Uruwhenua Bridge on SH60, caused by rats, affecting around 1,150 connections, including around 800 fibre and 350 copper connections, with mobile and internet service and 111 access affected. The risk is therefore not theoretical. It is a materialised, recurring single-route resilience issue.¹

STRIM's concern is not simply that outages occur. It is that a route failure can affect mobile, internet, landline/VoIP, EFTPOS, medical alarms, public information and practical emergency access such as 111 together, while no party appears to own the end-to-end question of what telecommunications capability should remain available when that route fails.

Correspondence received by STRIM from the Minister for Media and Communications on 13 May 2026 advised that decisions about network design, redundancy and transmission routes — including fibre or microwave links — are operational matters for network operators, who are best placed to assess feasibility, costs, risks and trade-offs for particular locations, including Golden Bay. The same correspondence records that NIFF and RCG are not responsible for the design or resilience of existing commercial networks outside funded initiatives, and that the Government does not currently have regulatory levers to compel specific resilience investments.²

This consultation is therefore directly relevant to STRIM's concern. If the Government cannot compel a specific regional backhaul resilience investment, and if route diversity is an operator decision, then the Commission's guidance on how providers assess resilience investment is one of the few mechanisms available to make this risk visible, assessable and accountable.

The 19 July 2026 planned Golden Bay-wide electricity outage is supporting evidence. It showed that even a planned, bounded event left many residents unable to tell which services worked, whether visible signal meant usable service, whether satellite fallback had activated, or what emergency communications remained practically available.

STRIM asks that the final guidance require clearer provider assessment of:

1. a minimum telecommunications continuity objective — what capability must remain available, or be restored within a defined period, when the route or backhaul path serving a community fails (section 3);

2. shared points of failure, including whether apparent provider or technology diversity is genuinely independent;
3. the difference between backup power and route/backhaul resilience;
4. restorability — the ability to detect, access, repair, restart and verify service under realistic outage conditions;
5. the conditions under which emergency roaming to another mobile network will and will not operate during access, backhaul or core network failure;
6. accountability mapping — who owns, operates, monitors, restores, communicates and assesses community-level risk;
7. community-facing resilience information at an appropriate level, without publishing sensitive network details.

STRIM also asks that the Commission’s follow-up work include isolated-community single-route telecommunications dependency as a named workstream, and that the Commission engage directly with affected communities as well as providers.

2. Golden Bay/Mohua evidence base

2.1 Repeated severance of the route serving the Bay

Golden Bay/Mohua has experienced major telecommunications disruption after fibre-route damage three times since 2022. The causes have differed — weather/geological damage, third-party human damage, and rodent damage — which is itself the point. The vulnerability is not hazard-specific. A single route can fail for any cause that reaches that route.

In this submission, single-route dependency includes effective single-route dependency: the existence of alternative physical infrastructure does not provide resilience where the relevant services are not provisioned to use an independent path.

Public reporting records that the July 2025 event involved a severed fibre-optic cable at Uruwhenua Bridge on SH60 and affected around 1,150 connections, including around 800 fibre and 350 copper connections. The reported consequence was loss of mobile and internet service across large parts of Golden Bay, affecting 111 calls.³

Chorus has publicly acknowledged that several regions connect to the fibre network via a single cable, some with larger populations than Golden Bay, and that this carries risks which are actively managed. STRIM does not dispute that. The question this consultation raises is what “actively managed” should mean in practice: whether monitoring and rapid response alone are sufficient, or whether it should also encompass a high standard of asset monitoring and maintenance, structured optioneering, minimum continuity objectives and restorability analysis where a single route carries essential communications for an isolated community.⁴

Three severances since 2022, one arising from rodent damage to the cable at a bridge crossing, raise a reasonable question about whether inspection, protection and maintenance regimes for single-route assets are proportionate to the consequence of their failure. STRIM holds no operator records and makes no finding. We ask that the final guidance expect providers to be able to demonstrate that answer where a single asset carries several critical telecommunications services for a community.

STRIM understands there is no clearly identified independent backup path serving the Bay. If that understanding is wrong, the relevant providers should be able to explain existing resilience

arrangements to local authorities, Lifelines Groups, emergency managers and affected communities at an appropriate level of detail. If it is correct, the risk should be formally assessed under the Commission's resilience guidance.

2.2 Public-safety consequence

The consequences are documented in contingency arrangements reported during the permanent repair. As reported at the time, Chorus advised that, while permanent repair work was under way, Golden Bay residents should expect a connection outage and that emergency calling could be unavailable. Residents unable to reach 111 were advised to drive to the Tākaka fire station and press a button at the front door, or go to the police station.⁵

Neither option is available to everyone. Driving to the fire station assumes a vehicle, the mobility to use it, and an open road, and those alternatives become less viable again during compound events. STRIM does not raise this as a criticism of the individuals managing that repair. It is evidence that no minimum continuity objective appears to exist for the route, and that is what the final guidance can address.

2.3 What the published emergency-calling arrangements do and do not cover

New Zealand has several instruments bearing on emergency calling. They address different purposes and different failure modes.

The TCF Emergency Calling Code is a mandatory TCF code, compulsory for TCF members. TCF members include the major mobile and fixed-line providers. It sets performance and customer-information standards for emergency voice calls. Its scope runs from the point at which the call is received by the voice service provider through to hand-off to the Initial Call Answering Platform. Its emergency-call availability measure addresses core network outages and expressly excludes downtime arising from a planned or unplanned outage in an access or backhaul network, or satellite gateway, on the stated basis that access and backhaul networks are predominantly subject to existing regulation. Its performance standards apply in normal operating conditions, which for a mobile service require that adequate coverage is present. Its emergency-roaming provision requires mobile operators to take all reasonable steps to enter into arrangements enabling their networks to receive emergency calls from other providers' customers, as far as is practically possible, when the customer's home network is unavailable — a term the Code does not define.⁶

TCF operational documentation accompanying the Code sets out mobile roaming scenarios for information, alongside rather than within the Code's mandatory provisions. That documentation records that emergency roaming depends on the handset being unable to attach to its home network, and identifies circumstances in which a device remains attached while calls cannot be completed, in which case emergency roaming does not occur. The documentation dates from 2022 and some scenarios rely on 3G fallback, which is no longer available in New Zealand. STRIM therefore treats it as establishing that the failure state is recognised, not as a description of current behaviour.⁷

The Commission's 111 Contact Code addresses a different problem: ensuring vulnerable residential landline consumers have a means of contacting 111 during a power failure at their premises. It is real and enforceable. The NECWG-A/NZ white paper records that it relates to fixed landline connections, while 89% of 111 calls are now made from mobile devices.⁸

STRIM does not suggest those boundaries are improper, and we make no legal conclusion. The observation we ask the Commission to consider is narrower: taken together, these instruments do

not give an affected community a clear end-to-end expectation of what emergency-calling capability should remain when the regional access or backhaul path serving it fails — particularly where a handset may still appear connected.

STRIM raises emergency calling here not as a separate programme of 111 reform, but as the highest-consequence example of why end-to-end telecommunications continuity must be assessed.

2.4 Compound exposure

Golden Bay/Mohua is geographically isolated. SH60 over Tākaka Hill is the main road access. A weather event that damages the telecommunications route may also affect road access, technician access, generator deployment, fuel delivery, public information and emergency coordination.

Exposure also changes seasonally. Stats NZ's estimated resident population for Golden Bay was 5,810 as at 30 June 2025, as published by Infometrics, and Golden Bay accounted for 9.7% of Tasman District's population in the year to March 2025. Peak visitor periods can materially increase the exposed population, with local estimates historically placing peak summer population above 20,000. Even if current peaks are lower, the exposed population and local response burden increase substantially during the visitor season. Visitors are less likely to know local fallback arrangements, alternative routes, local radio channels, community contacts or where to seek help if normal telecommunications fail.⁹

2.5 Power resilience is not route resilience

The Minister's 13 May 2026 correspondence records that the Government's named telecommunications resilience investment is battery upgrades at around 300 to 350 rural and remote cell sites, lifting battery life to up to 24 hours so mobile networks can continue operating during power outages.¹⁰

That is a worthwhile intervention for one failure mode, and the need is real: the NECWG-A/NZ white paper records that during ex-Tropical Cyclone Tam at Easter 2025 several Northland cell sites switched to battery power which ran out after about two hours, leaving many people unable to call 111 or receive emergency alerts. But battery capacity does not resolve the other failure mode. When the route serving an area is severed, powered sites still require a working path back into the network. Golden Bay has experienced repeated route severance, and telecommunications disruption or uncertainty during power outages. The final guidance should require providers to distinguish these modes explicitly and should not treat backup power as evidence of route or backhaul resilience.¹¹

The telecommunications sector itself uses the same distinction. In its one-year retrospective after Cyclone Gabrielle, the Telecommunications Forum described telecommunications networks as relying on two distinct elements: power and backhaul. It also recorded that, after Gabrielle, the sector focused on eliminating single points of failure where possible, adding alternative fibre routes and satellite backup backhaul for mobile cell sites, and that Chorus built new fibre loops and 160km of new fibre between Thames and Whitianga, with added redundancy expected for more than 400,000 properties. STRIM is therefore not asking for a novel concept. We ask that the same type of single-point-of-failure assessment and resilience optioneering be applied where Golden Bay/Mohua's risk has already materialised repeatedly.¹²

That said, physical route diversity does not necessarily translate into service diversity. Whether a particular service benefits from an alternative route depends on how its access and backhaul arrangements are provisioned. The relevant resilience question is therefore not only whether

another physical route exists, but whether the services relied on by the community are actually configured to use an adequately independent path.

On satellite, the same ministerial correspondence acknowledges that, as at 13 May 2026, calling 111 through direct-to-cell satellite services was not available, and the 2022 TCF Emergency Calling Code excludes providers of satellite phone services from its scope, stating that those services cannot be used to make emergency calls under that Code. The Telecommunications Forum also notes that satellite services still rely on power supply and on fibre connectivity through earth-station and onward network arrangements, and do not have the same capacity as fibre. Satellite may become part of the resilience picture over time. It should not be treated as a present substitute for route resilience, or as a guaranteed emergency fallback, unless its independence, activation conditions, capacity, emergency-calling capability and provider responsibilities are understood.¹³

2.6 The 19 July 2026 planned outage evidence

After the 19 July 2026 planned electricity outage, STRIM gathered a structured community evidence set. It is not a scientific coverage survey and should not be used to rank providers or prove technical causes without operator records.

The current evidence set includes 56 anonymised contributor-level reports:¹⁴

- 41 reporting problems;
- 9 reporting services working;
- 6 signal-only or context reports;
- 11 reports of false or unusable signal;
- 12 reports of problems continuing after household power returned;
- 4 reports that satellite fallback did not activate or switch on.

STRIM does not claim that 111 failed during the 19 July event, and we do not claim to know the cause of the reported symptoms. The evidence shows something different but still important: residents could not reliably tell what was working, what was failing, whether visible signal meant usable service, whether fallback had activated, who was responsible, or whether emergency communications remained practically available. Industry documentation, as noted at 2.3, recognises that apparent network availability does not necessarily mean an emergency call will proceed.

This matters because if a planned power outage creates that level of uncertainty, a severed telecommunications route during bad weather, road disruption or peak season is a different order of risk.

3. A minimum telecommunications continuity objective

This submission uses the term “minimum telecommunications continuity objective” deliberately, in place of “essential service”. The question is not which services should be classified as essential — a classification that could otherwise become entangled in debate over which retail, internet-based or cloud services are “essential” — but what capability must remain available, or be restored within a defined period, when the route or backhaul path serving a community fails.

The objective has two layers, and both are needed:

Outcome layer. What must people still practically be able to do during failure? At minimum, reliable practical access to emergency services. Over time, emergency contact is likely to include text, image, video and location information as well as voice.

Infrastructure layer. What adequately independent end-to-end path is required to support that outcome, including appropriate interconnection with the relevant service network?

Reliable infrastructure is necessary but not sufficient. A resilient path that does not carry a usable emergency call has not delivered the objective. The draft guidance already emphasises service delivery rather than solely asset management, noting at paragraph 1.18 that effective resilience investment prioritisation depends on a clear consumer and service delivery focus rather than solely asset management-focused solutions. STRIM suggests making that distinction more explicit for telecommunications by requiring providers to state the continuity objective and demonstrate the end-to-end path that supports it. We offer this framing as a starting point for definition rather than a settled answer.¹⁵

STRIM notes that this approach is not foreign to the sector. A report commissioned by One New Zealand, Spark, 2degrees, Fortysouth and Connexa — whose broader conclusions about rural fibre investment STRIM does not endorse — proposes that rural connectivity objectives be expressed as tiered service outcomes rather than technology mandates, and that in the most remote areas a baseline level of service should support messaging and emergency communications. This is consistent with the outcome-first structure described here: define the outcome that must survive, then ask what path is required to deliver it.²³

4. Responses to consultation questions

MAKING OUR GUIDANCE CLEAR AND EFFECTIVE

Q1. *Is the draft guidance clear about its purpose and practical status, including the level of analysis and rigour the Commission expects for more material resilience expenditure proposals?*

The purpose and practical status are clear. The proportionality principle — that analysis should scale with the materiality, cost, uncertainty and consequence of the investment — is sound.

STRIM's concern is that materiality may be judged primarily by expenditure size, revenue or customer numbers. A route serving around 1,150 connections may never appear material by those measures, yet its failure can remove essential communications, including emergency access, for an isolated community. The guidance should be explicit that consequence, not only expenditure or connection count, determines the rigour expected.

We note that the draft already recognises much of this. It acknowledges that rural and isolated communities can experience the same outage very differently, cautions against treating willingness to pay as a proxy for need where risk-bearing capacity is low, and expects social, cultural and community impacts to feature in cost-benefit analysis. Our concern is that these protections should survive the conversion from consequence assessment into investment prioritisation under Principles 8 to 10, so that low connection count or small regional economic value does not wash out high public-safety consequence at the point where projects are ranked.

The final guidance would also be stronger if it more clearly recognised community evidence and isolated-community experience as triggers for provider assessment. Where community evidence shows repeated service loss, false or degraded service, unresolved interdependencies or public-safety uncertainty, providers should be expected to treat that as relevant to whether a resilience risk is material enough for analysis.

Q2. *Is it clear how the draft guidance should be applied proportionately across sectors with different levels of maturity?*

The proportionality approach is sensible, but in telecommunications it should not be based only on direct connection counts, revenue or asset size.

For isolated communities, a small number of fixed connections may understate total impact because the same infrastructure can support mobile service, emergency calling, EFTPOS, medical alarms and public information. Golden Bay/Mohua's resident population was 5,810 as at 30 June 2025, and Golden Bay accounted for 9.7% of Tasman District's population in the year to March 2025. Golden Bay's scale illustrates why district- or network-level metrics may understate a concentrated local consequence. Peak visitor periods can materially increase the exposed population and local response burden.

Proportionality should therefore account for isolation, seasonal exposure, public-safety consequence, repeated incidents, and whether one route, site, backhaul path, power dependency or restoration process can affect several services at once.

Q3. *Are there implementation barriers, overlaps, or accountability issues in the wider resilience and regulatory landscape that may affect how this guidance is applied in practice?*

Yes. STRIM considers this the most important issue for isolated telecommunications resilience, and it is now evidenced from well beyond our own experience.

Golden Bay/Mohua's concern has been raised with MBIE, NIFF, RCG and Ministers. Correspondence received by STRIM from the Minister for Media and Communications records that network design, redundancy and transmission routes are operational matters for operators; that NIFF and RCG are not responsible for the design or resilience of existing commercial networks outside funded initiatives; and that Government does not currently have regulatory levers to compel specific resilience investments.

The same pattern appears in the emergency communications sector. The NECWG-A/NZ white paper on the future of the 111 Service, prepared with contributions from NZ Police, Fire and Emergency New Zealand, Hato Hone St John and Wellington Free Ambulance, describes an Emergency Contact System operating within a complex and fragmented legislative framework, lacking central governance and performance accountability, and records that emergency service organisations have no ownership or control over how the first point of contact for a 111 call is managed. It also reproduces the 2023 Government Inquiry finding that it is difficult to ascertain where responsibility for ownership of the 111 system sits. This is sector evidence rather than government policy, but it corroborates from an independent direction what STRIM has found from Golden Bay.¹⁶

The continuing fragmentation of the system multiplies the risk rather than containing it. The difficulty is not that nobody owns telecommunications — many organisations properly own parts of it. It is that no party appears to own the end-to-end resilience outcome the community actually experiences. Access network, site power, backhaul, core network, emergency roaming, 111 call handling, road access and restoration can each sit within different arrangements, while a resident experiences only one question: can I get help when everything fails at once?

STRIM recognises that this fragmentation can also make end-to-end resilience difficult to audit: no single operator may hold complete visibility across every dependency. Where that is the case, the guidance should expect coordinated assessment across the relevant infrastructure owners and service providers, rather than allowing the absence of single-party visibility to leave the end-to-end risk unassessed.

The final guidance should help close that gap by requiring providers to map responsibility for the part of the resilience outcome they can control or influence, including ownership, operation, monitoring, restoration, consumer communication, interdependencies and coordination with local agencies. The Internet Infrastructure Climate Resilience Project also identifies the need for clarity about who has authority and responsibility for setting resilience rules and guidance, and for ensuring that responsibility sits in the appropriate place.¹⁷

The guidance should also anticipate two interfaces. The first is the Emergency Management Bill (No 2), currently before Parliament. Schedule 3 would treat an entity providing a public telecommunications network as an essential infrastructure provider, with duties relating to the functioning of that infrastructure during and after an emergency. The second is the set of instruments governing emergency calling described at section 2.3, whose boundaries STRIM considers warrant separate examination by Government. The Commission's guidance should help ensure single-route dependency does not fall between commercial investment assessment, emergency-calling arrangements and emergency-management duties.¹⁸

Q4. *What areas should the Commission prioritise in further work?*

STRIM asks the Commission to prioritise specific follow-up work on isolated-community telecommunications continuity and single-route dependency, and to engage directly with affected communities as well as providers.

In particular, the Commission should consider:

1. telecommunications-specific guidance on shared points of failure and independence of failure paths;
2. minimum telecommunications continuity objectives for main-route or backhaul failure, including practical access to emergency services;
3. expectations that providers test and disclose the conditions under which emergency roaming will and will not operate during access, backhaul or core network failure;
4. reporting or disclosure that helps local authorities, Lifelines Groups, CDEM, iwi/hapū and communities understand resilience gaps without publishing sensitive network details;
5. service-experienced resilience measures, not only asset restoration measures;
6. clearer interaction between Commission resilience guidance, emergency-calling instruments and emerging emergency-management duties;

7. provider-facing guidance on coordination arrangements with emergency-response organisations, including memoranda of understanding where appropriate.
8. whether existing regulated-fibre investment and cost-recovery settings adequately enable low-revenue but high-consequence resilience investment in isolated communities, including investment in genuine route diversity.

STRIM does not propose a particular regulatory or cost-allocation treatment. The question is whether current settings create an avoidable barrier where the resilience benefit is important but the local revenue base is small.

For Golden Bay/Mohua, the right question is not only whether individual towers have batteries. It is what provider-integrated diverse path, continuity objective, operating model, prioritisation and cost-sharing would be required to maintain or restore minimum continuity capability when the main route is severed.

COMPLETENESS AND USEFULNESS

Q5. *Which aspects of the draft guidance are most helpful for informing your investment decision making, and why?*

STRIM is not an infrastructure investor, but the draft guidance is useful because it helps communities, councils, Lifelines participants and emergency-management partners understand what good provider decision-making should consider.

The most helpful aspects are the recognition of rural and isolated community impacts, interdependencies, distributional consequences, community risk-bearing capacity, asset criticality and structured optioneering. These principles are relevant where the main risk is not a single visible asset failure, but a system dependency that no one organisation appears to own end-to-end.

Q6. *Which parts of the draft guidance are unclear, unnecessary, or could be improved?*

The guidance would be more useful if several telecommunications-specific improvements were made within the relevant principles and indicators.

Principle 3, accounting for interdependencies, would benefit from a telecommunications example showing that nominally separate services may share a single backhaul route, and that loss of that route can remove both ordinary service and the mobile fallback assumed by public emergency advice.

Table 3.1, Principle 6, currently asks whether assets at risk have been objectively ranked for criticality. STRIM suggests an added indicator: whether the provider has tested the independence of failure paths, rather than relying on the presence of multiple providers, technologies or coverage.

Principle 7, structured optioneering, would benefit from an added prompt: what minimum continuity capability should be maintained or restored during failure of a main route or backhaul path, and what options — including provider-integrated diverse paths, prioritisation and shared arrangements — were considered and discounted.

This optioneering should include cross-sector infrastructure options where appropriate. Powerco's Coromandel fibre project provides a New Zealand precedent: Powerco is building a closed fibre loop for electricity network monitoring and control, and Chorus can use spare capacity in that dark fibre asset as backhaul between exchanges. Whether any analogous arrangement is feasible for Golden Bay/Mohua or the Tākaka Hill corridor is a question only the relevant operators can answer. The guidance should require such options to be considered and either advanced or explicitly discounted.¹⁹

Principle 9, option effectiveness, should incorporate restorability: whether the provider can detect, access, repair, restart and verify service under the conditions that caused the outage.

Information disclosure and community engagement. The guidance notes at paragraph 1.14 that information disclosure requirements do not explicitly prescribe how resilience investment should be reported, while expecting relevant aspects of resilience planning and investment to be reflected in disclosures. Principles 2 and 4 set expectations for targeted engagement with affected communities. Those expectations should extend to community-facing service expectations during foreseeable outages, including emergency calling. Public advice encourages callers to try 111 because another available mobile network may carry the call. Industry documentation, however, recognises circumstances in which a handset remains attached to its home network while calls cannot be completed, and emergency roaming therefore does not occur. STRIM does not claim to know how these behaviours apply in any particular New Zealand failure; that is the point, because communities, councils and emergency managers cannot determine it from published information either. Providers should be expected to test and disclose, at an appropriate non-sensitive level, the conditions under which emergency roaming will and will not operate, including current behaviour in the 4G and 5G environment following the 3G shutdown and in shared-network arrangements.²⁰

Q7. *Are any principles missing? Are there areas of overlap where the principles could be simplified or streamlined?*

Two concepts should be made more explicit within the existing principles rather than added as separate new principles: shared points of failure, and restorability. STRIM's suggested drafting for both is set out under Q6. Neither requires a wholesale rewrite. They can sit as telecommunications examples, prompts or indicators within the existing principles.

Q8. *Are there any missing frameworks or evaluation tools that should be included or referenced?*

STRIM does not ask the Commission to add more complex modelling for its own sake. The missing tools are practical prompts for telecommunications resilience and place-based consequence assessment.

The final guidance would benefit from tools or prompts for:

- continuity objectives;
- shared-points-of-failure mapping;
- responsibility mapping;
- post-event reconciliation between community reports and operator records;
- restorability assessment;
- community evidence protocols.

A relevant New Zealand-specific framework is the Internet Infrastructure Climate Resilience Project's May 2026 report, *Actions to support Internet Infrastructure Climate Resilience*. It identifies six themes for action: shared purpose, system-wide plans, community-centred resilience, data-informed decisions, clear expectations, and collaborative approach. It also points to the project's "5Rs" framework — robustness, redundancy, resourcefulness, rapidity and relationships. The report already recommends that the Commerce Commission consider and appropriately incorporate impacts on Internet infrastructure resilience, including interdependencies with electricity, as it develops a system-wide resilience principles framework. STRIM supports that recommendation and offers Golden Bay/Mohua as a practical case for why it matters.²¹

A Golden Bay/Mohua continuity picture could be one example of the kind of place-based tool the guidance should encourage. It would not need to publish sensitive technical details, but could show the continuity objective, known shared points of failure, responsible parties, fallback options, public advice, restoration escalation path and unresolved questions requiring provider records.

YOUR CURRENT APPROACH AND EXPERIENCE

Q9. *To what extent do you already apply these principles in your resilience-related decision-making processes? If not, what currently guides your resilience-related investment decisions?*

STRIM is not an infrastructure provider and does not make regulated investment decisions. We cannot see backhaul routes, site power logs, network alarms, emergency-calling records or restoration priorities.

That asymmetry is part of the issue. Community evidence can identify where lived experience diverges from stated resilience, but only provider-integrated assessment can confirm cause, consequence, options and accountability.

STRIM's work is guided by local outage experience, structured community evidence, public-source review, Lifelines/CDEM resilience thinking, stakeholder correspondence and practical consequence analysis from the perspective of an isolated community.

Q10. *Do you have practical examples of applying these principles — in a specific sector, or cross-sector — that could be shared to support other users of the guidance?*

Yes. Golden Bay/Mohua offers two practical examples.

The first is the repeated severance of the fibre route serving the Bay. STRIM's outage history records a slip at Birds Hill in 2022 and contractor damage in 2023, and public reporting records the July 2025 severance at Uruwhenua Bridge on SH60. This shows why resilience assessment should consider repeated events, multiple hazards, cascading impacts and high-impact risks that have already materialised. It also shows why direct connection counts may understate public-safety consequence.

The second is the 19 July 2026 planned electricity outage, summarised at section 2.6 above. That evidence does not prove technical cause, rank providers or prove 111 failure. It does show that residents could not reliably tell whether service had practically returned, whether visible signal was usable, or whether fallback arrangements were operating.

Together, the two examples show why provider records and community evidence need to be reconciled after events. Community reports show the lived service outcome. Operator records are

needed to confirm power status, backhaul status, alarms, restoration actions, emergency-calling arrangements and actual service availability.

COMMUNITY, MĀORI AND PLACE-BASED CONSIDERATIONS

Q11. *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?*

STRIM cannot speak for iwi, hapū or Māori. The framework should require infrastructure providers to engage directly with mana whenua and relevant Māori organisations rather than inferring Māori perspectives through general community consultation.

The draft guidance already recognises at paragraph 2.12 that rural, isolated and often Māori communities may experience the same outage very differently, including where local capability is already carrying part of the resilience burden when formal services fail. Principle 4 makes the related point that self-provisioning should not be taken as evidence of strong infrastructure resilience. STRIM supports both points, and asks that they carry through into the indicators in Table 3.1 rather than remaining statements of context.

Engagement should occur before preferred options are locked in. Providers should explain how local and iwi/hapū engagement changed their assessment of risk, options, continuity objectives or restoration priorities.

STRIM's community evidence covers localities across Mohua and can support engagement led by mana whenua, but it should not substitute for it.

Q12. *Which cross-sector vulnerabilities and interdependencies should the framework place the greatest emphasis on, and expect infrastructure providers and the Commission to pay closest attention to?*

The framework should place greatest emphasis on shared points of failure: situations where a small number of physical routes, sites, power supplies, backhaul paths, restoration crews or access roads support multiple services that appear separate to the public.

For Golden Bay/Mohua, the most important cross-sector vulnerability is the relationship between the telecommunications route serving the Bay, the road and access corridor, electricity dependencies, and emergency communications. The fibre route serving the area has been damaged three times since 2022. A route failure can remove ordinary telecommunications service and practical emergency fallback together, while the same event may also affect road access, repair access and public information.

In telecommunications, the critical distinction is between apparent diversity and real resilience, and it applies at two levels.

At the infrastructure level, multiple retail brands may not represent multiple independent paths. The Rural Connectivity Group's shared network is a documented national example: three mobile operators share site infrastructure, including pole, antenna, power and backhaul, while retaining separate core networks. STRIM makes no claim about which arrangement applies at any particular Golden Bay site; that is exactly the kind of thing a provider assessment should establish and a community cannot. The general point stands nationally.²²

At the service level, apparent connectivity does not establish emergency-call capability. STRIM's 19 July community evidence recorded eleven reports of a phone displaying signal while ordinary messaging, data or calls did not work. We do not claim to know the cause. Industry documentation accompanying the Emergency Calling Code recognises that such a state can exist and that emergency roaming may not be triggered by it.

The framework should also distinguish outage modes. Battery backup and generators address local power loss; they do not address a severed route. Satellite fallback may assist in some circumstances but should not be treated as resilience unless activation conditions, capacity, emergency-calling capability, local usability and provider responsibilities are understood.

Finally, providers should be expected to document who owns the asset, who operates the service, who monitors failure, who restores it, who communicates with consumers, and who assesses whether the resulting community-level risk is acceptable. For Golden Bay/Mohua, STRIM's central concern is not simply that a route may fail, but that no party appears to own the end-to-end question of what happens to minimum continuity capability when it does.

Diversity should not be counted as resilience unless the relevant failure paths and restoration arrangements are demonstrably independent.

References

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2. Correspondence received by STRIM from Hon Paul Goldsmith, Minister for Media and Communications, 13 May 2026, reference CORPG4517.
3. Connection numbers as reported by Chorus and carried in RNZ, 4 July 2025.
4. RNZ, “Golden Bay residents call for investment to future-proof emergency phone line”, 14 August 2025.
5. NZ Herald, “Golden Bay shut off to emergency services while repairs made to communication cable”, 1 August 2025.
6. New Zealand Telecommunications Forum, Code for Emergency Voice Calling Services (Emergency Calling Code), 4th edition, 21 July 2022, clauses 9.2, 10.1, 15, 20.2–20.3 and 21.3. The current Code and its signatories are listed at <https://www.tcf.org.nz/industry-hub/industry-codes/emergency-calling-code>
7. New Zealand Telecommunications Forum, Operations and Support Manual for the Emergency Calling Code, July 2022, Schedule 5 (111 call roaming scenarios), provided for information alongside the Code.
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9. Stats NZ estimated resident population for Golden Bay, 5,810 as at 30 June 2025, published in Infometrics, Regional Economic Profile: Golden Bay. <https://regions.infometrics.co.nz/golden-bay/population/growth>
10. Goldsmith correspondence, 13 May 2026.
11. NECWG-A/NZ, The Future of the 111 Service and the Emergency Contact System in New Zealand, v1.1, 17 November 2025, prepared by NECWG-A/NZ with contributions from NZ Police, Fire and Emergency New Zealand, Hato Hone St John and Wellington Free Ambulance. <https://necwg-anz.org/wp-content/uploads/2025/12/NECWG-White-Paper-NZ-17.11.2025-v1.1-3.pdf>
12. New Zealand Telecommunications Forum, “One year on from Gabrielle”. <https://www.tcf.org.nz/news/one-year-on>
13. Goldsmith correspondence, 13 May 2026; Emergency Calling Code, clause 10.1.
14. STRIM Golden Bay 19 July 2026 Community Evidence Report v3.0, and the public community evidence map at <https://strim-power-outage-19jul26.netlify.app/maps/community-evidence-map>
15. Commerce Commission, Resilience Principles: Decision-making framework for critical infrastructure providers — Draft guidance document, 3 July 2026, paragraph 1.18.
16. NECWG-A/NZ white paper, above n 11.
17. Actions to support Internet Infrastructure Climate Resilience. Internet Infrastructure Climate Resilience Project, 2026; prepared by Brainbox Institute, May 2026. <https://www.internetresilience.nz/>
18. Emergency Management Bill (No 2), Schedule 3 and clause 74, as reported back by the Governance and Administration Committee on 5 June 2026. Status as at 9 August 2026: passed second reading, awaiting the Committee of the whole House.
19. Powerco, “Delivering differently — our Coromandel fibre project”. <https://www.powerco.co.nz/what-we-do/our-projects/delivering-differently>
20. Draft guidance document, paragraph 1.14; Principles 2 and 4, “what we expect to see”.
21. IICR, Actions to support Internet Infrastructure Climate Resilience, above n 17.
22. Rural Connectivity Group, published descriptions of its shared network architecture (shared pole, antenna, power and backhaul; a single radio access network connecting to the three operators’ separate core networks). <https://www.thercg.co.nz/rcg-network/>

23. Connecting Rural New Zealand, prepared by Flint Global, March 2026, for One New Zealand Group Ltd, Spark New Zealand Ltd, 2degrees Mobile Ltd, Fortysouth Group LP and Connexa Ltd, paragraphs 115, 117 and 120.

STRIM's published evidence

The anonymised community evidence underlying section 2.6 is published in full:

- Community evidence report v3.0 and interactive evidence map: strim-power-outage-19jul26.netlify.app
- STRIM website, including an evidence and sources page listing the references cited in this submission: www.strim.nz

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