Fibre ID Amendment 2025 – Notes from Working Group on Outages

Context

- The purpose of this document is to summarise key points from our Working Group held with regulated fibre providers in April 2025.[1] The Working Group aimed to understand how the providers currently measure 'outages,' and to test the feasibility of potential reporting requirements that we could introducing in future.[2]

- We signalled to industry in December 2024 that we were considering amending the Fibre Information Disclosure (**ID**) Determination 2021. On 13 March 2025, we published a Process and Issues paper (**P&I paper**) for the Fibre ID Amendments 2025. The P&I paper noted that one of the key issues to resolve was the on-going outages measurement issue.

- Regulated fibre providers that submitted on the P&I paper were supportive of us holding a working group with industry on this issue. On 17 April 2025, Commission staff held a Working Group on Outages with technical staff from the four regulated providers.[3] The findings from this Working Group have fed into our proposed changes for the 'Outages' issue, detailed in the 'Fibre Information Disclosure Amendments 2025' draft decisions reasons paper.[4]

- We note that this summary is technical in nature. We have also tested the content with regulated providers for accuracy (clarifications are included).

1 The regulated fibre providers are Chorus, Enable Networks, Northpower Fibre and Tuatahi First Fibre
2 'Outage' essentially refers to the amount of time that the fibre service is unavailable to consumers. See clause 1.1.4(2) of the Fibre Input Methodologies 2020 for the legal definition
3 A PWC staff member also attended in an observer role to consider the discussion from an auditability perspective.
4 Commerce Commission, Fibre Information Disclosure Amendments 2025 – Draft decision reasons paper, (5 August 2025)

Outages – Working group summary

Current reporting of downtime under ID

- All four regulated providers use some level of self-reported (self-identified) downtime within average unplanned downtime calculations. The high level approach seems consistent but there is some variation in detail

    - Enable indicated that this includes major faults – whether self-identified or reported. Counting starts from the first downtime impact reported on the platform. Tuatahi and Northpower noted that they follow the same approach.

    - Chorus indicated that it reports from when a network alarm goes off, or from when the customer reports it. Chorus clarified via email that it has not included 'self-identified' downtime (ie, using network alarms) for substantial network events since the Part 6 regime came into effect.[5] See Chorus' response to s221 notice dated 20 September 2024 for further explanation.[6]

Capability to reconcile self-reported downtime with customer-reported downtime

- Little-to-no reconciliation is currently happening (reflecting the challenge of translating system alerts into an accurate measure of end-user downtime). However:

    - Chorus and Enable indicate they have sufficient safety nets in place to prevent duplicated counting of downtime.

    - Tuatahi indicated it can easily prevent the duplication of downtime if the outage is identified early enough. Tuatahi clarified via email that when a 'Major Incident' is created, a notification is sent to Retail Service Providers (**RSP**s).[7] This prevents subsequent individual tickets being logged against the incident, and any tickets logged prior to the incident are retrospectively linked.

    - Northpower currently has limited automated capability. Downtime measurement is likely to contain double-counting

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5 *Email from Chorus staff, 12 June 2025*
6 *https://comcom.govt.nz/__data/assets/pdf_file/0021/363306/Chorus-response-to-s-221-on-outages-20-September-2024.pdf*
7 *Email from Tuatahi staff, 11 June 2025*

Outages – Working group summary

Threshold of a 'major fault/outage' for self-reported downtime

- While there are common elements across industry for triaging and responding to outages, there does not appear to be a clear materiality threshold. The key similarity is that there is generally no reaction to service loss from individual Optical Network Terminals (**ONTs**) (eg, residential end-users) unless raised via an RSP (ie, customer-reported)

  - Enable always reports Optical Line Terminal events for Layer 1 and Layer 2 FFLAS.[8] On the Layer 2 network, Enable will raise a ticket immediately where multiple end-users are affected (this could include very short outages)

  - Like Enable, Chorus does not react to individual service loss (ie, they react only where multiple end-users are affected). Chorus noted issues around identifying whether a 'red alert' for an ONT is service loss of a current end-user, or if it is an ONT that does not currently have an active service/end-user

  - Tuatahi indicated that it does the same as Chorus. Tuatahi clarified via email that when a PON-level alarm or higher (ie, closer to the 'trunk' of the network) is triggered, a Major Incident is created. Due to the high volume of ONT alarms – many of which are unrelated to the Tuatahi network – it is not feasible to respond to each ONT alarm. [9]

Potential materiality threshold for ID reporting

- Brief discussion of a previously suggested materiality threshold for self-reporting. This threshold was proposed to be set as an outage between the regulated provider's fibre aggregation network and passive network (up to the splitter), affecting more than one end-user.

8   *The Open Systems Interconnection (OSI) model is a reference model containing seven different layers, where Layer 1 is the 'physical layer' and Layer 2 is the 'data link layer.'*
9   *Email from Tuatahi staff, 11 June 2025*

Outages – Working group summary

Options for future downtime reporting

- All four regulated providers had a preference for customer-reported downtime only. The main reasons for this are that it:
  - provides a robust baseline for comparability given varying approaches to including self-reported downtime
  - is consistent with historical industry practice to primarily rely on RSP notifications (as they serve the end-users)
  - is low cost to implement

- Chorus also suggested that customer-reported downtime alone could arguably serve the purpose of ID with respect to sufficient asset investment

- No new options were proposed

Other points raised

- Tuatahi raised concerns with the verifiable nature of self-reported downtime (specifically for audit verification)

- Tuatahi suggested providing flexibility within the definition of downtime so each of the regulated providers can continue to include self-reported downtime as they see fit. Northpower indicated it disagreed with this approach as this could lead to a lack of comparability with slightly different practices across industry for including self-reported downtime