

ISPANZ *update*

January 2007

Operational separation

An industry meeting on operational separation organised by InternetNZ was held alongside the NZNOG meeting in Palmerston North at the end of January. Attendees included industry and user groups such as ISPANZ and TUANZ, government agencies the Ministry of Economic Development and Commerce Commission and industry players such as Telecom, Vodafone, Ihug and Slingshot, as well as many others.

This meeting was to kick-start discussion about the key issues of which parts of the network, and which services, go in which divisions of the separated Telecom – retail, wholesale and network.

The Government is on a tight timeline in this process and the idea is to get input into that. Telecom surprised through the openness of its approach, with Stephen Crombie outlining the company's planning for implementing restructuring, albeit acknowledging he is not responsible for policy.

The incumbent appears interested in ensuring ease of servicing and avoidance of duplication following the split, and the general feeling of the meeting was that these are good aims but that the proven British Telecom model should be followed as a priority, unless there are some very good arguments to vary from it that do not compromise the aims of equivalence of inputs for ISPs and benefits to end users.

There was much emphasis from attendees that the split take account of the Telecom's planned NGN so that future access or "bottleneck" services are automatically available to the industry without ongoing conflict.



Copyright submissions deadline extended

Submissions on the Copyright Amendment (New Technologies and Performers' Rights) Bill now close Friday 9 March.

Here is the [link](#) to the Bill and here is the link to presentations from the InternetNZ [workshop](#). This is a key issue for ISPs in terms of our current liability for copyright infringement of customers, a situation the Bill is seeking to address.

InternetNZ is proposing a notice and notice takedown system based on Canadian law. This would replace completely the process currently being proposed and should be considered by everyone involved in hosting.

Help create good law for ISPs and web hosting firms by doing your own submission. These need not be long and can be done online at the Parliament website.

Many of a technical bent will also be interested in the other issues around the bill, which include getting digital rights management and format shifting regulation right.

UBS backhaul

ISPANZ has written to Telecom outlining a number of issues around backhaul and a meeting has been arranged. These issues include:

- Equivalence – or how Telecom retail customers are getting better service levels on average than those that a customer would experience via UBS.
- Lack of promised Ethernet-delivered handover links
- Capacity constrained by aggregated 32kbit/s per customer
- Expensive ATM interface port charges
- Expensive URSA remapping charges
- Inability to combine services over one interconnect interface
- Telecom does not allow aggregation equipment in UBS Service Access Points
- Telecom does not allow shared cables into UBS Service Access Points
- UBS data cap surcharges need to be removed
- Service levels and reporting is incomplete and immature.

Telecom Scorecard

Thanks to contributors to the Telecom Scorecard document.

ISPANZ has met with Telecom to discuss the Scorecard. Head of Wholesale Matt Crockett has advised it will be input into performance reviews for wholesale managers. Action is underway on the lowest graded areas — UBS backhaul and peering.

The Scorecard will be sent to InternetNZ, MED, Commerce Commission, and TUANZ.

ISPANZ had a further meeting to discuss Telecom outage notifications. As a result a new notification form has been proposed by Telecom.

Sign up to the customer complaints code

The Customer Complaints Code was endorsed by the Telecommunications Carriers' Forum board in December. The scheme encompasses a Code of Practice and a disputes resolution process.

The TCF has written to ISPANZ members seeking in-principle support for the scheme, for which costs will be apportioned according to usage. You should have that document, otherwise contact Susan Wells at the TCF.

As noted previously the Government clearly intends to regulate if this voluntary code is not implemented. If you haven't signed the code then please read it and sign it now. Whatever reservations one might have, ISPANZ believes the alternative of Government regulation would be worse. The TCF website can be found [here](#).

LLU working groups

A recent TCF board meeting considered the proposal for Phase 2 timetable and budget for the LLU working groups. This Phase will involve completing the detail for implementation.

There will be four working groups. LLU OSS, LLU Technical Interface Specs, Spectrum Management and Naked DSL. The target is for a completed Code by August followed by consultation and leading to sign-off in the later part of the year.

LLU standard terms

The Telecommunications Carriers' Forum has met with the Commerce Commission on local loop unbundling. The Commission is planning to produce a set of standard terms determinations and is now seeking feedback on priorities. This has been the subject of a separate email to members so please respond on this if you have a strong opinion.

Progress on UBS

There has been no response from Telecom on ISPANZ' proposal for enhanced UBS. The ISPANZ working group had gone back to Telecom with a specification of what it is looking for. Enhanced UBS is not only about removing the 128k uplink constraint, but also enabling the capability for real time service. An announcement is due soon from the Commerce Commission about the lhug/Callplus application for reconsideration of UBS pricing.

If you have any queries on the information above or actions for ISPANZ to consider please contact the directors individually, or jointly at directors@ispanz.org.nz