

18 June 2024

communicationspolicy@mbie.govt.nz
via online submission

Thank you for the opportunity to provide feedback on the discussion document entitled “Enhancing Telecommunications regulatory and funding frameworks”.

Connexa is a specialist mobile tower company that manages a passive mobile tower infrastructure network of approximately 2400 mobile towers. Connexa was established through the purchase of mobile towers that previously belonged to Spark and 2degrees. Connexa are engaged by the mobile network operators (Spark, 2degrees, OneNZ and several smaller enterprises requiring telecommunications network coverage) to deploy new infrastructure and the co-location of telecommunication equipment to a minimum of 1,000 sites and points of presence over the next 10 years.

Connexa operate passive infrastructure assets that support the mobile network – this includes physical towers, masts and poles; as well as foundations, fencing and access facilities, along with the ground leases and licences that secure space for the towers and associated equipment. The active components of the mobile network are owned and managed by the mobile network operators. This is predominately the equipment that delivers mobile services to consumers and requires power and/or fibre to operate such as the antennas, radio units (processor, receiver, transmitter) and the backhaul transmission equipment (see attachment 1 for passive / active split).

The mobile networks we support are an important component of the telecommunications sector, enabling services (fast wireless internet access, messaging and voice calling) that New Zealanders, businesses and government rely on to be able to communicate, do business, provide transport access, run airlines, provide access to essential services, keep connected with family and friends and access emergency services wherever they are. Telecommunications is also an enabler for other areas of critical infrastructure, such as electricity, fuel and banking. Our infrastructure is essential for economic growth and social wellbeing.

The “TowerCo” business model is relatively new to New Zealand with Connexa approaching its 2nd anniversary, although the model has been in place in overseas jurisdictions for some time. Connexa holds Network Utility Operator Status under the Telecommunications Act, as well as membership with New Zealand Utilities Advisory Group (NZUAG), Civil Defence Emergency National Lifelines Utilities Forum and Auckland Lifelines Group.

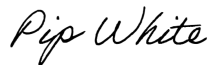
Connexa will accelerate the deployment of critical infrastructure to keep pace with the ever increasing demand for data and improves the coverage and capacity of New Zealand’s telecommunication networks. Through efficiencies of Connexa owning and operating the mobile infrastructure, mobile network operators will be able to invest in new technology and keep pace with local users demands and global trends. This aligns with the Government priorities of reducing the infrastructure deficit and provides development and growth opportunities for New Zealand’s economic wealth and wellbeing.

Connexa is a member of the New Zealand Telecommunications Forum (TCF) which represents the telecommunications industry, bringing industry experts together to resolve regulatory, technical and policy issues in a collaborative industry forum. The TCF facilitates the development of consensus-based, self-regulatory codes, that set standards and specifications for the way members interact on industry-wide issues. It has established working parties (made up of TCF member representatives) to undertake specific pieces of work and deliver a unified voice for the sector.

As a TCF member Connexa is a member of the TCF dispute resolution scheme, however, we are not a retailer and we do not have direct consumer relationships. Connexa operates as an infrastructure provider to mobile network operators (Spark, 2degrees & OneNZ) as well as other providers of telecommunications, who are hosted on Connexa infrastructure e.g Police, Airways Corporation and Civil Defence. Given Connexa's lack of consumer based services, Connexa's preference would be for it not to be caught by any mandatory requirement to participate in a dispute resolution scheme. In addition, Connexa is identified as a liable person for both the TDL and TRL. It is noted that the levy liability regime was put in place prior to Connexa being established and the subsequent separation of both "active" and "passive" infrastructure in the mobile telecommunications industry. [REDACTED]

Connexa support the submission of the TCF dated 19 June 2024. Connexa has no further comments on the regulatory settings of the industry as outlined in the discussion document at this time, however we welcome the opportunity to be involved in future engagement opportunities.

Ngā mihi,



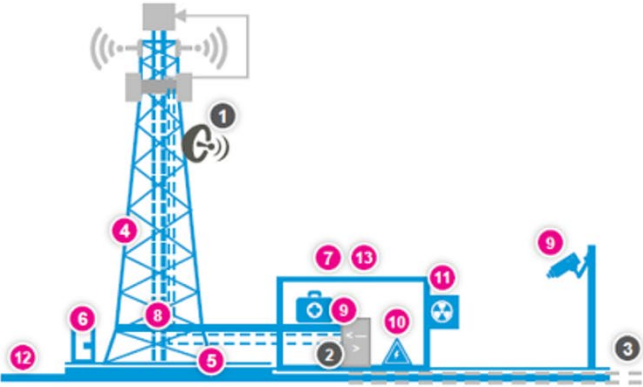
Pip White

Head of Legal

Connexa Limited

Attachment 1. Active and Passive Infrastructure split

Connexa:

	Asset / Equipment	Ownership
<p>Standard configuration of a Macro tower</p> 	1 Active radio-transmission equipment	Connexa Customers
	2 Backhaul router	
	3 Backhaul fibre	
	4 Transmission masts and towers	Connexa
	5 Fencing / gates	
	6 Access facilities	
	7 Huts (incl. rack space and cabinets)	
	8 Rooftop walkways / ladders	
	9 Fire suppression and security systems ⁽²⁾	
	10 DC power, back-up generators and batteries	
	11 Airconditioning units	
	12 Mobile only freehold sites	
	13 Other passive equipment	