



31 October 2022

His Worship the Mayor
Wayne Brown
Auckland Council
Via email

Dear Mayor Brown,

First and foremost, congratulations on your election win. 2degrees looks forward to working with you and Auckland Council as we continue to roll out new and improved 2degrees services in the Auckland region.

2degrees is proud to offer Aucklanders, and all Kiwis, fixed and mobile telecommunications services over our award-winning national network. Since launching in 2009 2degrees has always been the customer champion, bringing the benefits of strong infrastructure-based competition to the New Zealand telco marketplace and always “fighting for fair”. 2degrees has now invested over a billion dollars and we connect more than 1.5 million people in the places Kiwis live and work. This has included very significant investment in our largest city, Auckland.

Thank you for your letter sharing the feedback you received during your recent mayoral campaign and we agree that great connectivity for Aucklanders is critical. 2degrees has a great network in Auckland and the team work hard to keep it that way. 2degrees provides 3G/4G coverage to over 98% of the population with growing 5G coverage. Auckland is a key focus of 2degrees’ 5G rollout. We partner with technology leader Ericsson, which operates more than 50% of the world’s 5G networks and brings significant expertise and scale to 2degrees next generation roll-out.

Coverage and performance for mobile service around a big city like Auckland requires constant optimisation. Mobile networks change as people move around the city hour by hour, day by day. Month on month the coverage can be affected as transport routes change, large buildings are completed and suburbs are developed. Our experts work 24/7 to keep the network optimised and to identify and fix any issues when they



occur. It's our job to cover where our customers go. We are highly motivated by delivering a good customer experience and ensuring it is seamless when people move from place to place.

As to be expected, as usage grows and the city expands we need to build new cell sites to keep up with demand. We must plan this ahead of time with our stakeholders. We are engaged at both national and local government level to support this – from changes to the Resource Management Act, to local planning. Both are critical to support continued investment in essential telecommunications infrastructure.

Building new sites is a big investment that needs collaboration with Council and many other stakeholders. We have identified a number of areas where Council can help support improved coverage and we would welcome working with your team on these:

Streamlining of the planning and build process:

Our team has a good relationship with Council as we must work together regularly for new sites and upgrades. However, the Council can help with practical rule changes to aid in site design and build, as well as more timely (within 20 working day) resource consent times. The more efficient we are, the more coverage we can invest in. Examples include approvals for access to the roading corridor and practical application of road closure notices and traffic management.

Rules and expectations on other third parties

As new housing developments are introduced, the needs of the population change. This is an area where we can work together to improve processes between Council, Central Government and developers for the benefit of Auckland residents in new suburbs.

Council can help with expectations around mobile coverage and planning when it comes to new buildings and subdivisions. Mobile coverage is often an afterthought. We consider that mobile telecommunications should be treated with greater priority within the planning framework- like other utilities, with involvement from early in the design phase. It is more disruptive and costly for operators to build infrastructure after a development is completed.

Support Central Government updating National Environmental Standards for Telecommunications Facilities (NESTF) as it works through RMA Reforms:



Central Government is currently reforming the Resource Management Act. This is expected to take years. We are concerned to ensure that the existing 'NESTF' standards, which sit under the current RMA and support deployment and upgrades of mobile infrastructure, are updated to remain fit-for-purpose during this transition period. We would appreciate Auckland Council supporting these updates to Central Government.

Rural Coverage:

As you know, Auckland covers a large area. On the edges, there are areas with a very low population, and it is not economic to build towers there. Thanks to the Rural Broadband Initiative (RBI) and Mobile Black Sport Fund (MBSF) projects, there is already a mechanism for such areas to be addressed, through Rural Connectivity Group build (a JV between the mobile operators). As you have identified, Bethells Beach is an example of an area that was a blackspot that now has mobile coverage.

As a member of the Telecommunications Carriers Forum (TCF) we requested the TCF provide you with a pan-industry response that includes additional detail on these issues.

We welcome engagement at both a 2degrees and TCF level. I am confident that collaboration can contribute to the continued deployment of world class mobile technology for Aucklanders.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Callander'.

Mark Callander
Chief Executive Officer