8 October 2019

National Policy Statement on Urban Development Consultation
Ministry for the Environment
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Attention: National Policy Statement on Urban Development Consultation

Submission Proposed National Policy Statement Urban Development

This submission is made by Spark New Zealand Trading Limited (Spark). Background information on Spark and the Telecommunication industry is provided in appendix 1.

1. Summary

1.1. Spark supports the development of expansion of the national direction tools, such as the proposed National Policy Statement for Urban Development (NPS-UD), proposed National Policy Statement for Highly Productive Land (NPS-HPL), and amendments to the National Policy Statement for Freshwater Management and a new National Environmental Standard for Freshwater Management (NPS-FM and NES-FM).

1.2. Spark considers that both the NPS-HPL and NPS-UD require further research, redrafting and another round of submissions to ensure these national policies are clear as to:

1.2.1. Hierarchy and Priority if one of the NPS documents is meant to be able to overrule another. In the ideal national direction toolbox that the NPS’s should be able to be read together and with clarity for implementation by regional and local government

1.2.2. Mechanisms for resolving conflicts

1.2.3. Stating clearly the outcomes required via the objectives and policies. For example, if highly productive land is to be avoided by urban development
then both NPS-HPL and NPS-UD need to be clear that highly productive is required to be protected and that it would in the exception that urban expansion would be promoted and permitted.

1.3. We are concerned about the time and expense a number of proposals that require engagement, provision of significant amounts of information and will trigger the need for local authorities to update Local Government Act plans and introduce plan changes under the RMA to ensure alignment with NPS-UD requirements.

1.4. Spark submits that all infrastructure to support new urban development and intensification needs to be planned for and able to be funded.

1.5. Given climate change it is consider necessary for definition of infrastructure to include flood protection and management for infrastructure.

1.6. Sparks submits that the new funding tools for infrastructure need to include all infrastructure including telecommunications, e.g. co-located wireless facilities and fibre. The discussion document states that the NPSUD will be supported by new tools for infrastructure funding and financing and investment. This is considered crucial to address infrastructural funding constraints and access to funding. Infrastructure funding needs to be inclusive of development and “other infrastructure” required to support the development of new urban areas or redevelopment of brownfields with intensive development. Funding by developers or other infrastructure tools such as via partnership with Crown Infrastructure Partners for telecommunication networks both fibre and wireless as appropriate. Expand funding to include electricity and telecommunication infrastructure (fibre and wireless) via Crown Infrastructure Partners with a Special Purpose Vehicle (SPV) as used in Auckland Milldale development in partnership with Auckland Council, Fulton Hogan Land Development and Accident Compensation Corporation.

1.7. It is critical especially for telecommunications mobile networks that physical information is plan, shown on development plans and probably built before the customers reside or have constructed premises in the new areas. The industry has traditionally had to fund the development of new wireless infrastructure, not developers or government for urban development. There is significant benefit to
developers, and future residents or businesses if they have certainty of what telecommunications services will be available, know the location of facilities and that there will operator diversity so that customers can change between operators as they choose. Telecommunications is a regulated industry sector in New Zealand, with the Commerce Commission overseeing the industry. Commerce Commission under the Telecommunications Act 2001 (Telecommunications Act) is required to monitor competition, and the performance and development of, telecommunication markets.

1.8. Recognition of the role and importance that all infrastructure being a critical part of the fabric of successful and well performing city. It is refreshing and encouraging that recognition there is infrastructure providers such as Sparks telecommunication/digital networks and services. The initiatives stemming from the The Urban Growth Agenda targeted interventions across the land and infrastructure markets organised around 5 pillars:

- Legislative Reform
- Infrastructure funding and financing
- Transport Pricing
- Spatial Planning
- Urban Planning

1.9. We however remain concerned that “other infrastructure” appears to be considered secondary and less important to ‘development infrastructure”. We consider that the title of “other infrastructure” be changed to “Other (or Additional) critical infrastructure” to recognise the critical importance of this infrastructure to urban development.

1.10. Our experience under the existing NPSUDC 2016 was that local authorities focused on the development infrastructure that central and local government owned or controlled i.e. road, public transport, national grid and 3 waters for a range of relevant reasons cost of funding, long term planning, long lead time for construction and fundamental to ability to develop. It has been extremely rare for local government to consider the needs of the telecommunications sector under that existing NPSUDC 2016, except as required to meet subdivision/development requirements. Consequently, new development areas in the high growth areas have
been planned without thought for current and future needs of the telecommunications operators. Spark, Vodafone, 2degrees and Chorus are the 4 national operators and provides of wireless (mobile) and fixed-line network. Within a development or new suburban area or brown field redevelopment users will often be looking for access to wireless and fixed line telecommunication services. Consequentially fibre and wireless infrastructure need to be considered for all development areas.

1.11. The technology rapidly changes Telecommunication networks and digital services are critical and essential to how we live and do business. Our modern world cannot function without these digital services. When there is disruption in the supply the impact to businesses and our lives is instant. What it takes to provide the digital services infrastructure is required, this is often not understood. That is to say both the wireless facility and fibre networks are required. While there is a trend for users to rely on the wireless networks and not have a fixed line service, fibre is critical to operation of the wireless networks and fixed line data usage is still growing.

1.12. The industry generally considers that all the growth areas identified can be serviced expanding the existing networks. This would mean to extension of the fibre networks into the new development areas and construction on infill wireless telecommunication facilities. Wireless technology e.g. 5G, or future 6G or 7G will have particular requirements that are likely to be mean that wireless sites are going to need to be closer to the end user. The site density requirements are currently unknown. Given that there is generally a spatial density of population in urban environments it is expected that NZ will not see the density of sites being constructed in countries such as Hong Kong, China or South Korea or cities such as Sydney or London.

1.13. We are concerned that poor alignment between the planning processes required under the three main Acts including the RMA and LGA, results in complexity, inefficiency and constraints to integrating land use and infrastructure. A another potential weak link is the inefficiency of changing Regional and District planning documents to align with FDS. Regional and District documents are on 10 to 15-year review process where as the FDS review occurs every 3 years. This is a risk that the Regional and District documents supporting FDS will become misaligned. To
avoid these potential outcomes, consideration should be given to a streamlined path for amending Regional Policy Statements and District Plans to give effect to a FDS that recognises the requirements for public consultation under P1F.

1.14. Spark considers that it is essential that it is recognised in the Future Urban Strategy framework that infrastructure providers include NZTA, Government’s health and education agencies and local authorities or their Council Controlled Organisations and importantly electricity, gas, and telecommunications (includes digital technology). “Other” infrastructure is as essential to urban development and the quality of life and success of cities as infrastructure provided by NZTA, or local government or their Council Controlled Organisations. The HPS-UD proposal’s success depends on all infrastructure appropriately participating in the development of future development strategies and providing all infrastructure types to support intensification. Regarding telecommunications engagement and involvement needs to include each relevant operator i.e. Spark, Vodafone, 2degrees and Chorus, noting that in Christchurch include Enable. To ensure customers have access to their choice of provider new developments and urban areas need to be serviced by the various telecommunication operators.

1.15. The introduction of new funding/financing tools for infrastructure needs to enable all infrastructure providers to deliver the services required for the success new or redevelopment urban/city space.

2. Specific Responses to the various questions
Question 1 & 2 - General
2.1. Sparks generally supports the new National Policy Statement on Urban Development (NPS-UD) to replace and expand on the existing National Policy Statement on Urban Development Capacity 2016 (NPS-UDC 2016). Recognition that the NPS-UDC 2016 needed to be reviewed and amended as set out in the national direction NPS-UD. However, we are that the NPS-UD needs further amendment and the opportunity for another round of submissions before the NPS-UD is given effect create successful cities that:
- can perform better
- collaborations to explore how to drive more efficient and liveable urban form
• stronger partnership between central/local government and iwi, hapū and communities
• new tools for all infrastructure funding and financing
• by making room for growth and
• adaptive cities and planning systems to accommodate rapid technology change, climate changes and needs of the communities

2.2. We consider that there is a tension and potential conflicts with the priorities of other National Policy Statements including on indigenous biodiversity, freshwater, air quality and the proposed National Policy Statement for Highly Productive Land.

2.3. Spark submits that in regard to network utility infrastructure to support the NPS-UD growth areas there is a need to explore strengthening the national tools such as National Planning Standards and National Environmental Standards. There needs to be consistency and certainty in the regulatory framework for building and upgrading networks such telecommunications, gas, electricity distribution, transport, rail and the 3 waters.

2.4. In October 2016 MfE established a multiple sector working group to draft a National Planning Standard for Network Utilities (NPSNU). While MfE has not been able to sustain funding, the working group continues working on the document. A final draft NPSNU will be complete before the end on 2019. This document is being promoted as best practice network utilities provisions in Regional Policy Statements and Unitary and District plans. We consider that there is significant benefit to local government and network utilities if the draft NPSNU was put back on the government priority work program for MfE to lead through the statutory process for approval as a National Planning Standard. The creation of a NPSNU would have the added benefit that potentially the NESTF 2016 could be withdrawn.

2.5. Sparks supports the targeting of the 6 major urban areas that are rapidly growing and under pressure. The change in focus assists the industry to undertake infrastructure planning where it is most needed.
Question 3 - Future Development Strategy

2.6. Under the NPS-UDC 2016 regime and practice local authorities have focused provision of development infrastructure and not generally working with the private infrastructure companies such as Spark when preparing development strategies or planning for infrastructure to support new development and ensure that telecommunications has been designed in an integrated manner.

2.7. Spark supports the objectives and policies such Objective 1 to provides for integrated landuse and infrastructure. However, it is noted in P1C that FDS are informed by documents such as the infrastructure strategies required under the Local Government Act. These strategies only recognise public infrastructure. This policy could be expanded to a requirement to be informed by the National infrastructure Strategy under the Infrastructure Commission.

2.8. Sparks supports P1De) the requirement for the FDS to identify infrastructure needed to support growth.

2.9. Spark submits that P1D f) needs to be altered to include a requirement to fund other infrastructure.

2.10. P1F is only focused on taking into consideration of NZTA, Government’s health and education agencies and local authorities or their Council Controlled Organisations this needs to be expanded out to include other infrastructure providers.

2.11. Spark considers that P1G should be altered to include provision for Spatial Planning.

Question 4 - Quality Urban Environments

2.12. Spark supports objective 2 in that it recognises the need to provide for future generations including by using land, energy and infrastructure efficiently. However, the policies failure to consider infrastructure, so how will the objective be achieved?

Question 5 Amenity Values

2.13. Spark considers that it is important to recognise to consider how infrastructure will be provided and upgraded within urban environments to meet the changing technology requirements of infrastructure but specially telecommunications and users. The built amenity and form of urban environments needs to recognise it will be part of the
visual amenity of the environment, and its form will evolve and change as future technology are rolled out. See Sparks comments in paragraphs 1.12, 2.16 and appendix 1.

**Question 6 Opportunities for Development**

2.14. Spark supports O5, P4A and P4C. However, the existing regulatory framework needs to be changed to enable new infrastructure to be designed and integrated into new developments/urban environments and that recognises that telecommunication infrastructure will change via the roll out new and upgraded infrastructure. Telecommunication infrastructure is regularly changing that is say every 5 to 10 years. See Sparks submission promoting the completion of the national infrastructure tool, NPSNU in paragraphs 2.3 and 2.4.

2.15. Spark submits that P5C also needs to consider the constraints on provision infrastructure current and future. The following practical measures could assist in protecting and providing for future infrastructure but especially wireless telecommunications:

2.15.1. On-going education (especially councillors, decision makers, council staff and other organisations that influence opinions) on telecommunication networks, how they function, safety and the opportunities they provide. The research science on health safety should be accepted and the government via Ministry of Health, MBIE and MfE plus the World Health Organisation trusted to provide guidance on safety and set the regulatory requirements for the telecommunications industry to comply.

2.15.2. Design of the wireless facilities and other digital infrastructure into new large developments at the start of the design and layout of the regulatory documents e.g. Plan Change, subdivision and or development plans.

2.15.3. Developers to proactively indicate the design expectations for the networks

2.15.4. Roof top wireless facilities could be better designed into taller residential development (terrace housing or apartments) instead of reliance on roadside facilities.
2.15.5. Creation of utility lots in subdivisions/development to provide permanent home for utilities. The ownership of the utility lots could be allocated to joint ownership of the utilities that the lot was created and have sale restrictions on it.

2.15.6. Body corporate documents (if there is a body corporate entity for the wider development) to provide for future upgrading of telecommunications facilities within the development. This such ensure in developments controlled by body corporates or similar management arrangement that residents no surprises and recognise that upgrading of infrastructure is normal when undertaken to permitted standards.

Question 7
2.16. Sparks considers that it would useful to require district plans to explain that infrastructure but especially telecommunications will evolve and change overtime because of the rapidly changing technologies. Noting that within the life of a Future Development Strategy or a 30-year Spatial plan telecommunication wireless technology will have evolved in ways we can only dare to imagine, potentially 7G. Unlike no other infrastructure sector Spark, Vodafone and 2degree rollout new generation technology 5 to 7 years. The 4G (fourth generation) network is only just being completed as the 5G (fifth generation) technology is just starting to be launched. As 5G is rolled out this is expected to will be integrated with the 4G in a similar way to the existing antennas carry both 3 and 4G technology. Eventually the legacy 3G networks can be deactivated.

Question 8
2.17. Spark supports greater density and brown field development over greenfields low density development. It is generally more cost efficient to build capacity into the existing networks serve a greater density of users than to expand the network.

Question 11
2.18. Sparks consider that completion and implementation of the draft NPSNU, as set per question 1 above in paragraphs 2.3 and 2.4, would be an appropriate intervention by enabling infrastructure to support urban growth under Future Development Strategies.
Question 12

2.19. Sparks considers that there should be a requirement to prove that partnership, collaboration and involvement of infrastructure providers has occurred through the process to create the FSP.

Question 13 Engagement on Urban planning

2.20. As an observation is that central or local government need to provide funding to support resources of iwi, hapu and whanau to participate as expected under objective 9 and related policies.

Question 14 Co-ordinated Planning

2.21. Spark supports O10 and in particular P10B. However, we are not clear on how actually integrated landuse and infrastructure planning will occur. The existing regulatory framework is not really setup to support the requirement for integrated landuse and infrastructure planning. There is going to have to be a significant culture change and education as to what is integrated landuse and infrastructure within the central local government and development community plus probably network utilities. No where within the draft NPS-UD is a description or definition of what integrated landuse and infrastructure. Noting that as technology rapidly evolves the integration opportunities and outcome are increasing and changing. We consider that it is important to continually review and reflect on what are the new integrated opportunities. This should be considered as part of the review of the FDS every 3 years.

2.22. Sparks recommends that within each of the major urban growth areas establishment of infrastructure technical liaison group. Meet probably 1 -2 times a year and for specific project work. Membership including NZTA, electricity, Transpower, council infrastructure, maybe someone from Infrastructure Commission or Crown Infrastructure Partners and Council Spatial/Infrastructure and a developer. Purpose wider ranging related to infrastructure; sounding board; providing comments/guidance; technical information; support for development or changing planning documents in relation to infrastructure.

Question 15 Timing
2.23. Given that the immediate focus is on the 6 major growth urban areas the timeframes while challenging is possible. The telecommunication industry will need to adapt to being asked to contribute and proactively support infrastructure planning in development areas. The regulatory frameworks and provisions going to be enabled to adapt and change to meet the changing demands of telecommunication technology or developers. This would be assisted by a commitment from MfE to implement the draft NPSNU so as to provide greater certainty for the construction and upgrading of network utilities in major growth urban areas but also nationwide. A NPSNU would significantly reduce the time and cost of being involved in district plan reviews. This time could then be put into supporting the development of FDS and ensuring telecommunication networks are available to provide the services demanded by customers.

**Question 16 Guidance and Implementation Support**

2.24. Sparks considers that if the urban growth initiatives are to be achieved it is critical that knowledge and capability is increased in local authorities, developers and other organisations involved implementing the HPS-UD and specifically about infrastructure. Guidance and workshops/education could include:

2.24.1. Workshops and training – including with on-line

2.24.2. Infrastructure education sessions –

- Telecommunications
- Electricity
- Roading
- Waters
- What integration look like and examples of best performance
- What are the opportunities to enhance the visual amenity but not diminish the performance of infrastructure or the customer experience?
- Technology trends with a focus on what’s needed for future proofing e.g. Smart City/Internet of Things

2.24.3. Climate change – protection, adaption or retreat

2.24.4. Partnership and collaboration training

2.24.5. Database of contact details for developers, network utilities etc

2.24.6. Spatial planning training
2.24.7. Development National monitoring tools and framework
2.24.8. Undertaking research on user/customer satisfaction, performance, feedback/data, including 3, 5 and 10 years after the development was completed, to test how the development, facilities e.g. parks or infrastructure is performing and continuing to meet the needs of businesses, users, residents, infrastructure providers. This data would be used to improve and inform future development strategies and infrastructure plan, funding needs to ensure that communities continue to be successful and high performing.
Contact Details

Yours sincerely,

[Redacted]
Appendix 1

Introduction to Spark New Zealand Trading Limited

1. Spark is New Zealand's largest digital services company delivering mobile, fixed and IT products and services to millions of New Zealand customers and businesses. Our vision for New Zealand is 'to help all of New Zealand win big in a digital world'.

2. Spark is a multi-brand business, with principal brands Spark (supporting home, consumer mobile and small business customers) and Spark Digital (supporting government and business customers with strong Cloud services, mobility and Information and Communication Technologies ("ICT") capabilities). Specialist and flanking brands include Skinny (consumer mobile and broadband), Revera and Computer Concepts Limited (data hosting services), Digital Island (business telecommunications), Lightbox (internet TV), Qrious (data analytics), and Bigpipe (consumer broadband).

3. Fully privatised since 1990, Spark is listed on the NZX and ASX stock exchanges. Spark contributes significantly to its communities through our community initiatives which are targeted around education. Spark uses digital technology to power a more generous society through Givealittle, New Zealand's premier crowdfunding platform for social good. Administered by the Spark Foundation, Spark Jump offers heavily subsidised broadband to families with school-aged children who cannot afford commercial broadband. Spark also supports a range of other education-focused initiatives by partnering with national not-for-profit organisations.

4. The New Zealand mobile market is growing. Success in wireless-based products and services is underpinned by our investment in our mobile network. Spark have now rolled out 4.5G to 31 locations across the country, bringing customers faster speeds and giving the network more capacity. Spark are also replacing the ageing Public Switched Telephone Network with our new Converged Communications Network. This will enable richer and better customer experiences with voice, video, and collaboration features over whatever Spark service is available at the moment customers want to use it.
5. Spark continues to provide a paging service network for emergency services such as New Zealand Fire Service. In particular volunteer fire officers in rural areas and health boards and customers for whom paging is also business critical. The network is being upgraded and expanded for coverage.

6. Spark is expanding the access to broadband services through Skinny Broadband, a prepaid service, as well as Wireless Broadband.

7. As part of this, Spark launched the broadband plan that flexes with the amount of data customers consume. Broadband customers do not always use the same amount of data each month so ‘Unplan’ gives customers the freedom to use more data when needed, and savings when they use less data. There is also a choice to include entertainment on your broadband plan, with the option of Unplan Entertainment.

8. In addition, Spark launched SPACETALK in November, a kids’ all-in-one smartphone, watch and GPS device. The kids’ watch is designed for children aged 5-12 years who are becoming more independent but are not yet ready for a full functioning, expensive smartphone. The watch is equipped with a wide range of practical features including the ability to stay connected throughout the day via text messages, voice messages, calls and interactive emojis.

9. All of these wireless broadband services deliver a fast and reliable internet connection using 4G mobile technology instead of a connection using the traditional copper line ADSL network.

10. Spark Sport was launched in mid-March 2019 as a digital broadband platform to stream sports broadcasting content via the Spark mobile network to mobile devices, computers, Chromecasts and smart TV’s via an online platform. Spark has secured the rights to many sports events, notably the Rugby World Cup 2019, English Premier League football, World Rally Championship and NBA league among others. In the first few months of service, Spark Sport has already successfully streamed hundreds of hours of live and on demand content, including several Formula 1 Grand Prix, World Rally Championship rounds, NBA games and FIH Pro League hockey matches.

11. Spark has led the race to deploy the next generation mobile network 5G technology in New Zealand. The deployment of 5G will be crucial for Spark’s future growth and is a big
driver of innovation. Spark has launched its own 5G network. The expansion of the 5G network deployment further is contingent on Spark securing additional 5G spectrum, with the frequencies known as C-Band and mm-Wave the most referenced bands globally when it comes to 5G. Spark understands it is the Government’s intention to auction 5G spectrum in early 2020.

12. Spark and Emirates Team New Zealand opened New Zealand’s first interactive 5G test lab in November 2018. The Spark 5G Lab has a dual purpose. It’s primarily designed to be a collaboration space for New Zealand innovators, entrepreneurs and companies like Emirates Team New Zealand to have early access to 5G, so they can test and develop products and experiences that will define the future. The lab will also host technologies that showcase some of the possibilities and benefits of 5G such as robotics, virtual reality, facial recognition, Internet of Things ("IoT"), smart cities, emergency services drones and driverless cars. Spark is providing Emirates Team New Zealand with telecommunications and digital connectivity, both on and off the water, as well as exclusive rights to provide telecommunications services and connectivity within areas controlled by the organizing company, America’s Cup Event Limited.

13. Spark has also rolled out two low-power networks with one of these now covering more than 65% of the population. Our IoT capability is already enabling a range of use cases, such as metering, smart lighting and environmental monitoring, connected vehicles and trackers on industrial vehicles to monitor the location of packages and condition of vehicles. Spark are also supporting test-use cases for IoT sensors in agribusiness to better manage farms, orchards and other agricultural use cases such as beehives.

Telecommunications industry

14. Worldwide, as technology develops, there has been a significant upward trend in the amount of mobile data consumed in New Zealand as shown in figure 5 from the Commerce Commission report 26 September 2019.

15. Technologies such as enhanced streaming services, for example 4k and 8k ultra high definition streaming, become available and commonplace, the bandwidth required for these services is greatly increased. This has and is occurring in a relatively short space of time (2010 – present). In certain markets internet streaming is replacing terrestrial or
satellite television as the medium of choice. Consumers’ demand for these services dictates what is expected of telecommunications providers and often seen as a ‘minimum’ requirement to be able to stream applications such as Netflix, Instagram, Facebook style in the ‘Mobile Digital era’.

16. Providing high quality connectivity and services to homes and businesses throughout New Zealand can be challenging. Rapid advances in technology are driving transformational changes as our products and services become increasingly important in the daily lives and businesses of New Zealanders. These advances have seen the telecommunications industry collectively investing $1.6 billion each year on average to deliver new services and network technology to New Zealanders. At the same time,
fierce competition is delivering more value to consumers at lower prices, meaning New Zealand is now in the enviable position of having world-class networks and services, at below OECD average prices, for both fixed and mobile communications.

17. In mobile wireless services, Spark, Vodafone and 2degrees are the three major mobile network operators who each compete for customers over their own network of cell towers, utilising radio spectrum licensed from the Government. Additionally, Spark, Vodafone and 2degrees have formed the Rural Connectivity Group to share a wireless network that will provide wireless coverage under a programme to extend mobile and wireless broadband coverage to remote areas of rural New Zealand as part of the Government’s Rural Broadband Initiative.

18. When it comes to fixed services provided over fibre or copper lines, the industry structure is quite different. The local line networks (sometimes referred to as the “last mile”) are owned by wholesale companies which must be separate from the retailers like Spark, Vodafone or 2degrees that provide services to customers. It is a bit like the network companies own and maintain the train tracks, while Spark runs our trains over these tracks.

19. Chorus owns the national copper line network, while the fibre network being built in cities and larger towns under the Government-sponsored ultra-fast broadband programme is owned by four different companies, each with a monopoly in their region:

- Ultrafast Fibre is responsible for Hamilton and other towns in Waikato, Taranaki, and Whanganui;
- Enable is in Christchurch and parts of Canterbury;
- North Power is in Whangarei; and
- Chorus is in the rest of the country including Queenstown, Auckland, Wellington and Dunedin.

20. Telecommunications is a regulated industry sector in New Zealand, with the Commerce Commission overseeing the industry. As part of this regulation, telecommunications companies are required to pay an annual Telecommunications Development Levy, which is used to improve New Zealand's telecommunications infrastructure (especially in rural
areas which are economically challenging to service). The current levy is $50 million annually.

21. To enable the industry to meet the construction requirements to deliver ever changing technology to our customers, we rely on regulatory frameworks both nationally, via the NESTF, and locally, via the relevant district or unitary plans to appropriately enable the upgrading of existing networks and construction of new networks.

22. Our network requirements are constantly changing and evolving unlike any other infrastructure sector, as reflected in the fact the new 5G networks have started to be rolled ahead of the government spectrum auctions in 2020. It should be noted that at the same time we are completing the 4G network in other parts of the country. New Zealanders and businesses completely depend on access to these networks.