



Alternative Voice Service Trials

Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 2154
CANBERRA ACT 2601

Via email: usg@communications.gov.au

To whom it may concern,

Re. Design of alternative voice service trials – request for comments and expressions of interest

The Regional, Rural and Remote Communications Coalition (RRRCC) welcomes the opportunity to provide a submission to the Department of Infrastructure, Transport, Regional Development and Communications' consultation on the design of alternative voice service trials.

The RRRCC is an alliance of 21 volunteer and advocacy organisations with a shared interest in improving telecommunications in the bush. The Coalition was formed in 2016 to raise awareness of the important role of connectivity for regional, rural and remote Australians and to advocate for continued improvements. The RRRCC's advocacy efforts are focused on five high level goals, under which we have articulated a number of specific asks. The RRRCC's five goals are:

1. Guaranteed access to voice and data services.
2. Equitable voice and data services that meet minimum standards and reliability.
3. Continued program to expand mobile coverage.
4. Digital capacity building for regional, rural and remote Australia.
5. Affordable communications services for regional, rural and remote Australia.

Under goal 2, the RRRCC asks that any alternative technologies for voice service delivery be proven to have greater reliability and performance quality for regional, rural and remote customers. This is directly relevant to the department's consultation on the design of trials for delivery of alternative voice services. The RRRCC understands that this program is a trial, but as it will inform future decisions regarding delivery of voice services under the Universal Service Guarantee we recommend the program guidelines make clear that the objective is to identify technologies that provide greater reliability (including an ability to be repaired promptly), quality and performance than existing services.

The RRRCC and its member organisations were closely involved in the 2018 Regional Telecommunications Review, which recommended that the telecommunications industry be asked to bring forward new and innovative solutions for providing voice services in rural and remote Australia, particularly in areas served by the high capacity radio concentrator (HCRC) network. The government's commitment to

fund trials for the delivery of alternative voice services is an important step to deliver on this recommendation, and is welcomed by the RRRCC.

The RRRCC makes the following comments regarding the proposed program design:

- **Competition.** It is important that the program design process gives consideration to how to encourage competition among CSPs in the areas targeted by the program. The department could consider how to incentivise smaller providers to participate in the trial, and in the ongoing delivery of services in these areas. There is a risk that large carriers might access the program funding to deliver services they are already obligated to provide, or to expand their presence and crowd out other providers.
- **Customer service.** Provision of appropriate customer service for trial participants is critical, and should be in addition to what is already available through CSPs, which can be difficult for customers to navigate. Customer service should be delivered by personnel with appropriate expertise and knowledge of the trial program and could for example include a dedicated helpdesk in the CSP or in the department (or a combination of both).
- **Monitoring and evaluation.** It is critical that the monitoring and evaluation component of the program is adequately resourced and robust, so that the findings of the trial are meaningful and can inform future policy and investment decisions. The trials should be subject to technical evaluation against established performance benchmarks, to assess the viability and suitability of each alternative. Feedback from trial participants on their user experiences should be in addition to the technical evaluation.
- **Trial timeframe.** The trial timeframe of 12 months may not be sufficient to fully assess the viability of alternative services. In the RRRCC's experience, service issues often become apparent after the technology has been in place for some time. To ensure that the alternative voice services are robust and to gauge their viability as long-term alternatives, there should be provision for user feedback beyond the 12-month trial period.
- **Affordability.** Affordability of alternative technologies will be a key issue for customers transitioning from HCRC or other services. The department could consider building in a requirement for CSPs to include estimated costs of delivering the service beyond the period of the trial. In evaluating applications, consideration should be given to whether the alternative service will be economically viable outside of a fully funded trial.
- **Include data capability.** To deliver maximum value to consumers and to derive maximum value from the trial, the department could require that alternative services have data capability as well as voice.
- **Existing infrastructure.** Consideration should be given to how to best take advantage of existing towers/infrastructure, such as HCRC and digital radio concentrator system towers (base and on farm towers), which are widespread, structurally sound, and could be repurposed.

- **Back-up services.** It is important that there is a backup service available for customers participating in the trial – i.e. access to their existing HCRC/other service if needed in an emergency situation should the trial service fail.
- **New and emerging technology.** Noting that the trial will focus on the use of existing technologies in HCRC locations, it is important that there is ongoing investment in R&D for new and innovative technologies, which could be deployed in these areas in the future.

Approximately \$2 million has been allocated to deliver the trial program, as part of the government's \$60 million Regional Connectivity Program. The RRRCC is concerned that further funding will be required to establish and deliver the trials to the target 1,000 customers over a 12-month period. Costs such as purchase and set up of necessary equipment (boosters, antennas etc.) in remote and dispersed locations, administration and customer support, promotion, and meaningful monitoring and evaluation are likely to be significant. The ability of carriage service providers (CSPs) to make in-kind contributions will be important.

The RRRCC would be happy to assist the department to identify target areas and customers to participate in the trials, and to assist with promotion of the trials.

Thank you again for the opportunity to provide a submission. Should you require any further information, please contact Adrienne Ryan, General Manager Rural Affairs at the National Farmers' Federation, on 02 6269 5666 or aryan@nff.org.au.

Yours sincerely,

The Regional, Rural and Remote Communications Coalition

