30 September 2021

The Hon Luke Hartsuyker
Chair
2021 Regional Telecommunications Review Committee
CANBERRA, ACT 2600

Dear Regional Telecommunications Review Independent Committee,

Re: 2021 Regional Telecommunications Review

The Regional, Rural and Remote Communications Coalition (RRRCC) welcomes the opportunity to provide a submission to the 2021 Regional Telecommunications Review (the Review).

The Review is an essential opportunity for those who live and work in regional, rural, and remote Australia to voice their experiences and concerns with their telecommunications services. Previous iterations of the Review have considered the views and recommendations of regional, rural and remote communities, leading to the successful implementation of a number of measures that have improved the experiences of regional Australians.

The RRRCC is an alliance of 21 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 congratulates the Regional Telecommunications Independent Review Committee (the Committee) on the consultations they have held across the country to date, recognising the difficulties border closures and lockdowns have had on the ability to hold face to face consultations. This must be taken as the first point about how Australia's reliance on telecommunications services, no matter where they live, is changing.

Being a Coalition of respected volunteer and advocacy organisations, the RRRCC have relied heavily on the content of our member's submissions and recommendations in developing this submission. The RRRCC supports the submissions of each of our member organisations who have submitted to this Review process.

RRRCC members who have provided separate submissions include:
- Australian Communications Consumer Action Network
- Better Internet for Rural, Regional and Remote Australia
- Isolated Children's Parents Association
- National Farmers' Federation
- National Rural Health Alliance

RRRCC Goals

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 each of these goals, there are a number of asks that the RRRCC recommends the Committee consider when developing their report.

Guaranteed access to voice and data services:
- The establishment of a Rural, Regional and Remote Communications Fund to resource ongoing investment in regional telecommunications through the Mobile Black Spot Program (MBSP), Regional Connectivity Program and State/ Territory co-investment programs.
- Telecommunications is legislated as an essential service in all states and territories, and telecommunications providers are recognised as 'essential users' in natural disaster areas.

Equitable voice and data services that meet minimum standards and reliability:
- The creation of appropriate minimum service guarantees and performance benchmarks for connection, fault repair and appointment keeping timeframes for NBN and other Statutory Infrastructure Providers. The obligations and timeframes must support maximum connectivity during natural disaster events. The Committee should encourage the Federal Government to prioritise progress on the draft standards rules and benchmarks for Statutory Infrastructure Providers, taking into account the needs of regional Australia.
- The Federal Government continue to fund the ACCC Measuring Broadband Australia program, including its expansion to NBN fixed wireless and Sky Muster services.

Continued program to expand mobile coverage:
- The Federal Government commit to ongoing mobile network expansion through the MBSP or similar programs.
- MBSP funded infrastructure continues to promote competition as well as coverage by requiring open access for all networks, including more initiatives such as the Field Solutions Group 'neutral host' model funded under MBSP Round 5A.
- MBSP funding be expanded to subsidise mobile coverage extension equipment.
- The Australian Communications and Media Authority (ACMA) should investigate and monitor widespread mobile outages in regional and remote Australia and the reliability of mobile infrastructure.

Digital capacity building for regional, rural and remote Australia.
- The Federal Government work with the RRRCC, local and state governments to identify and deliver digital capacity building needs beyond the current remit of the Regional Tech Hub. For the Regional Tech Hub to be appropriately funded on an ongoing basis for digital capacity building and troubleshooting services.

Affordable communications services for regional, rural and remote Australia.
- To address significant affordability barriers, the creation of a targeted concessional NBN broadband service to support low-income residents of regional, rural and remote areas. This should incorporate a publicly funded gap payment for eligible households.
- The Federal Government review the existing telecommunications allowance so that it meets the needs of low-income mobile only consumers.
- Support is provided for regional, rural and remote Australians, particularly Aboriginal and Torres Strait communities, to have access to affordable equipment options to allow them to maximise the benefits of the services on offer to them, such as medical services.

Priority points

In addition to the relevant asks under the RRRCC goals, the RRRCC would like to reinforce several priority areas for the Committee to consider when developing their recommendations.

Telecommunications is an essential service: Reliance on telecommunications services and connectivity is becoming more profound. Lockdowns, movement restrictions and work from home orders across the COVID-19 pandemic have reinforced this reliance, with even the Committee relying on connectivity to conduct their consultations. As reliance grows, the gap between metropolitan and regional consumers widens. Therefore, as recommended under goal one, the RRRCC recommend the Committee recommend that telecommunications be legislated as an essential service in all states and territories and that telecommunications providers are recognised as 'essential users' in natural disaster areas.

Digital literacy: Consumers in regional, rural and remote parts of Australia must have the digital skills required to make the most of telecommunications products and services. The extent to which digital literacy and capacity building is required in the regions is growing, and the current limitations in knowledge and technical skills within the regions must be acknowledged. Consequently, more funding is required to increase ability for all regional, rural and remote Australians. As the Regional Tech Hub is now gaining profile as a recognised source of information and tech support, it is well placed to deliver the digital literacy support and programs needed, but only if additional resources are provided for it to do so.

Affordability: Affordable connectivity contributes to better economic and social outcomes. As the digital divide continues to grow, barriers such as affordability for connectivity options in the regions further stifles our productive potential. The Committee should consider the creation of a targeted concessional NBN broadband service to support low-income residents of regional, rural and remote areas along with a reconfiguration of the existing telecommunications allowance to meet the needs of low-income mobile only consumers, to help reduce the divide.

Natural disasters and remote backup power: The experiences of the 2019-20 bushfire season demonstrated that current arrangements for backup power supply are inadequate. Therefore, in developing their recommendations, the Committee should consider the requirements for power supply for mobile towers, increasing the capabilities of a tower to remain functioning for 4-7 days in high-risk and remote areas during power outages, to allow sufficient time for technicians to restore the service.

Grant applications and community support: Place-based connectivity solutions are needed, and therefore more support needs to be given at a local government level to identify the needs of communities and coordinate efforts to improve connectivity. Support could be given in the form of assistance provided to local governments applying for project grants under the Regional Connectivity Program (RCP). Part of this involves having dedicated facilitators for the RCP and MBSP to assist communities seeking to improve connectivity in their area.

Investment in services for mobile coverage in fringe areas: The RRRCC are aware of a large number of consumers who live and or work in fringe mobile coverage areas, where telecommunications coverage maps indicate the area is serviced, but on-

ground experience shows there is patchy, unreliable or no coverage. The RRRCC ask the Committee to consider recommending the establishment of a framework for including network extension equipment in current or future MBSP funding. This is also particularly relevant in areas of very low population density, where the incentive for MNO investment is comparatively lower and additional equipment is needed to maximise any mobile reception that is available.

A review of current programs: Over the last three years, several new government investment programs have been aimed at delivering improved telecommunications. These programs require measurement of program outcomes to ensure that the programs continue to be effective. There is currently no measurement of pre-program and post-program levels of digital inclusion, and the appropriate data must be collected to allow for program evaluation. The RRRCC recommend the Committee recommend the inclusion of 'measurement of program outcomes' as a requirement in all current and future government programs. This will ensure learnings can be incorporated to reiterations of programs and would be able to demonstrate which programs are more effective at meeting their aims.

Accurate reporting of coverage maps: There are significant discrepancies between coverage maps and on-ground experience. While the RRRCC is aware of the different reasons for these differing experiences, such as congestion or degrading infrastructure, consumers are unaware of the cause. They, therefore, are starting on the back foot when attempting to implement methods to solve their connectivity issues. The RRRCC recommend the Committee encourage enforcing telecommunications carriers to use on ground testing as their priority information input into coverage maps.

Landlines and multiple connectivity options: Many regional, rural and remote Australians rely on a single connection to connect to essential and non-essential means along with their landline. Further, many of these residents continue to rely on landlines during emergencies, such as flood and fire, when mobile network services are disrupted or overwhelmed. Adequate maintenance and reliability of landlines continues to be a priority to ensure that rural, regional and remote customers are able to access back up technology to remain connected at all times.

Staffing and assistance: The RRRCC have noticed a reduction in on-ground staff to support regional, rural and remote customers. An example being one telecommunications company having only one staff covering South Australia and the Northern Territory. Telecommunication companies are appropriately resourced to provide services to their customers and therefore should deliver face-to-face and targeted assistance across the country. It is unacceptable that those in regional Australia cannot access the same assistance services as those in metropolitan areas. Additionally, when a customer is unable to receive the support they seek, the telecommunications companies should be required to provide information on how the customer can receive independent support or provide information on how a customer can escalate the issue.

3G shut-off reassurances: Any telecommunications provides switching off their 3G service should provide assurances that not only coverage will be matched by the 4G service, but also that the 4G service will have the capacity to keep up with the increased use of broadband what will occur after customers are able to use their mobile service for more functions such as live streaming.

Yours Sincerely,

The Regional Rural and Remote Communications Coalition