

Submission – Better delivery of universal services

East Gippsland Shire Council

Introduction

Thank you for the opportunity to provide a submission to the review *better delivery of universal services*.

The challenges and opportunities afforded by new technologies are set out in the Discussion Paper.

This submission highlights a number of issues that are relevant to East Gippsland, particularly drawing on the experience of our community during the 2019/20 Black Summer Fires and during the COVID 19 pandemic. Similar issues were also experienced during the storms that battered Gippsland on the 13 February 2024 and I note that impacts were even more acutely experienced in Mirboo North, part of the South Gippsland Shire.

About East Gippsland

East Gippsland is a large and vibrant region in a beautiful natural setting, home to proud and involved communities that embrace and encourage self-reliance, responsibility and new ideas. The past 30 years have seen East Gippsland evolve from its rural origins to a flourishing economic and tourism region in Eastern Victoria, drawing more than one million visitors each year.

The region has kept its identity and sense of place as it has grown. The shire stretches from west of Bairnsdale to the New South Wales border, covering more than 21,000 square kilometres or 10 per cent of the state. East Gippsland's unique qualities are both its strength and challenges.

The region is distinguished by its natural setting, with its southern edge defined by the Gippsland Lakes and rugged coastline and the rising backdrop of the High Country. Historical rural landscapes and natural bushland areas characterise the region and surround its communities.

In terms of telecommunications service provision, one of the challenges in East Gippsland is the number of dispersed communities located within mountain areas, often with a single line for supply of power and conventional voice telecommunications. Further the geography means coverage afforded by mobile or NBN wireless infrastructure is more limited and more vulnerable to interruption.

East Gippsland has a diverse community, with areas of low socioeconomic status and a significant Aboriginal community.

East Gippsland's experience relevant to the delivery of universal services

A number of events impacting East Gippsland have shaped this submission:

- 2019-20 Black Summer Bushfires (and other disaster events). The 2019-20 fires burnt more than 50% of East Gippsland and resulted in the isolation of a large number of communities. In such events information is critical and while telecommunications remained largely functional for some areas (e.g. Mallacoota) there were a large number of communities where telecommunications were lost for a significant period of time. This has been well documented in the Royal Commission into National Natural Disaster Arrangements and other reviews. It is acknowledged that loss of telecommunications

was principally related to loss of power to key sites (in some cases for 4 weeks or more) and in some cases loss of copper wire connections. The 2019-20 fires also demonstrated the value of alternate means of communication e.g. satellite. Trauma from events such as the 2019-20 is experienced as a loss of control and access to information is critical to reducing the trauma associated with such events.

- COVID-19 Pandemic. In response to the pandemic many government services moved online, including schooling. Similarly, many workplaces have moved to an expectation of “work from home”. These shifts are calling into question what is required in the universal service requirement in contemporary rural and remote Australia.
- Recent Victorian storm event and power and telecommunication outage 13/2/2024. This event highlighted the critical nature of telecommunications in responding to the storm event. While telecommunications were typically restored more quickly than mains power, it did highlight our collective vulnerability to events of this kind. Of particular irony was that most of the information about the reconnection of power supplies was directed through online sources (power company websites etc) and access to this online information was compromised by the lack of power.

Telecommunications were reviewed and upgraded following the 2019-20 Black Summer Fires, resulting in increased provision of batteries, generators and other measures to improve service reliability. Council also commissioned a report to surface the lived-experience of telecommunications in East Gippsland ([EGSC Digital Connectivity Report and Assessment.pdf \(windows.net\)](#))

However, the experience of the most recent storms is contrary to the “promise” offered by the system upgrades following the 2019/20 fires. For example, promised minimum 8 hours battery life was not reflected in the service reliability experienced on the 13 February 2024.

Large, widespread events that impact infrastructure are not “black swan” events – they are entirely foreseeable (Black Summer Fires, recent major flooding in the north of Victoria, 13 February 2024 storms). Further, it is at these times of emergency that telecommunications are most critical.

Key issues for consideration

The changing nature of government (and commercial) services means that the universal obligations need to consider provision of both baseline data and voice services at an affordable price to all Australians.

Similarly, telecommunication services have enabled online business and remote work to the benefit of more isolated communities. However, increasing reliance on these services by businesses including retail businesses, emphasizes that effective economic participation in society is increasingly reliant on telecommunication services. Again, there is a need for baseline voice and data services to support economic participation.

The changing technology available for telecommunications means that alternatives to land-based copper connections can be considered that may provide both more reliable and cost-effective services for remote areas (e.g. combinations of technology including landline, mobile or wireless NBN and low earth orbit satellite). Alternatively, a combination of technologies may provide the most effective outcome in terms of cost and reliability.

Given the heavy reliance of emergency services on provision of advice and warnings by digital methods, telecommunications must be considered as an essential service with defined performance requirements in relation to reliability. Such reliability requirements need to take into account the combined reliability of the telecommunications infrastructure and any power or other energy systems on which it relies.

The cost of digital services can be significant in remote areas as cost escalates with data use. This was uncovered during the COVID 19 pandemic where families in remote areas needed to upgrade satellite services to effectively engage in home schooling with several video connections in operation at once. Further, community members in regional areas sometimes have low levels of disposable income which affects their capacity to access telecommunications. For example, the Cann Valley in East Gippsland as a SEIFA index of 873 in 2021.

To the extent that there is change in technology for universal services, there will be a need to invest in digital literacy and change management to ensure that vulnerable cohorts in community can effectively access baseline services.

As a result, future universal service obligations:

- Can be technology neutral to provide for better, more cost effective services as technology develops;
- Must provide for a baseline data as well as voice service, with the service level reflecting the shift of government service delivery and emergency information online;
- Must set out required reliability performance (taking into account the reliability of both telecommunications and power supplies on which it may rely)
- Need to consider pricing so that baseline services are provided at an affordable or accessible cost to all Australians no matter where they live, while recognising high performance services may be provided on a commercial basis.
- Need to factor in investment in digital literacy where this is required to support, for example, changes in technology used to deliver universal services.

Telecommunications are an essential service and needs to be designed, managed and regulated accordingly.