

Our Ref: S009-T00007

1 March 2024

Department of Infrastructure, Transport, Regional Development, Communications and the Arts.

[Submitted online.](#)

To whom it may concern,

Better delivery of universal services

On behalf of Eurobodalla Shire Council, I welcome the opportunity to respond to the Department's Discussion Paper on the better delivery of universal services.

Eurobodalla Shire is located on the south coast of NSW, consisting of coastal and hinterland settlements on the eastern side of the Great Dividing Range. Our complex topography includes 80 percent of the land area being state forest or national parks and telecommunications challenges experienced during the Black Summer bushfires are well documented. Eurobodalla is also home to a significant population that identifies as first nations peoples and other socially vulnerable cohorts. Our economy is based on tourism and diversifying our economy is subject to ensuring available and competitive services that are fit for purpose.

It is for these reasons that Eurobodalla Shire has a significant interest in telecommunications reforms and exploration of technologies that suit the needs of our community. As a Council we do not hold telecommunications expertise but wish to ensure our community is given universal service. Regarding the review of the Universal Services Obligation (USO), we ask that our views on three areas of specific interest are considered.

Reliability of services

Eurobodalla's experience in during 2019-2020 Bush Summer bushfires demonstrated the vulnerability of services through impacts to network facilities. According to the Telstra submission to the Victorian Bushfire Inquiry, in NSW 171 fixed line and 65 mobile network facilities were impacted such as local sites in Surf Beach and Maula Bay. It should be noted that the impacts in percentage terms were 1.3% of fixed line and 3.1% of the mobile network facilities indicating the significant failing of the mobile network. Whilst the same submission indicated that 21,000 customers of fixed line services were impacted, a true figure of mobile customers is unclear.

Much has been learnt from this and subsequent disasters, and we hope that resilience and reliability of services are a key focus of the USO to safeguard the connectivity of our community.

Potential to explore new technologies

We support reform of the agreement enabling the exploration of new technologies. As stated, Eurobodalla has complex topography that poses challenges for mobile service delivery, so ensuring alternative communications options exist in communities such as Nerrigundah and Lilli Pilli are essential. Access to land for infrastructure provision is becoming more difficult as private landholders are resistant to agreements and in the case of Eurobodalla, there is limited public land available. Public land that does exist often has conflicting existing uses that can prevent the development of network infrastructure.

The use of new technologies such as low earth orbital satellites may also provide more cost-effective solutions in modernising fixed and broadband solutions. Therefore, regulation that is technology neutral, but with sufficient safeguards such as guarantees could ensure better service deliver.

Consumer protection and inclusive access

Eurobodalla Shire has a SEIFA index of disadvantage score of 985. Aboriginal Australians are 5.7% of our resident population and Eurobodalla has the sixth highest age dependency ratio in Australia and an undermined number of homeless and transient temporary residents. Digital literacy and access to cost effective services are essential for our community such as free pay phone services and access to Wi-Fi. Pay phones exist in most of our settlements and are an integral piece of community infrastructure for disadvantaged groups and have proven their worth during times of disaster.

I look forward to the outcomes of this review and should you require further information, please contact me on [REDACTED]

Yours sincerely

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