



Every Queensland
community deserves
to be a liveable one

Discussion Paper: Better Delivery of Universal Services

Submission to the Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts

March 2024

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Contents

1.0	Executive Summary	4
1.1	Recommendations	5
2.0	Introduction	7
2.1	LGAQ Policy Statement.....	7
2.2	Relevant LGAQ Annual Conference Resolutions.....	8
3.0	LGAQ Response to Consultation Questions.....	10
3.1	Key outcomes for a modern universal service framework.....	10
3.2	Safety net services.....	13
3.3	Mobile services.....	14
3.4	Existing requirements	17
3.5	Payphones.....	19
3.6	Affordability.....	19
3.7	Better outcomes for First Nations communities	19
4.0	Conclusion	20

About the Local Government Association of Queensland (LGAQ)

The Local Government Association of Queensland (LGAQ) is the peak body for local government in Queensland. It is a not-for-profit association established solely to serve councils and their needs. The LGAQ has been advising, supporting, and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities. The LGAQ does this by connecting councils to people and places; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and providing them with the means to achieve community, professional and political excellence.

Partners in Government Agreement

The LGAQ on behalf of all 77 Queensland local governments is a signatory to a three-year partners-in-government-agreement with the State of Queensland.

The Agreement details the key principles underlying the relationship between the state and local governments and establishes the foundation for effective negotiation and engagement between both levels of government.

The Agreement acknowledges that local government is the closest level of government to the community, affecting the lives of everyday Queenslanders and acknowledging Local Government as a genuine partner in the Australian government system.

The intent of the Agreement was to continue the tradition of working in genuine partnership to improve the quality of life for all Queenslanders to enjoy. By identifying the roles and responsibilities of each party, it provides a solid foundation for effective negotiation and engagement between both levels of government.

The LGAQ is committed to working with the State Government and will continue to be a passionate advocate for councils, to serve our joint jurisdiction for the people of Queensland.

Rural and Remote Councils Compact

The Rural and Remote Councils Compact¹ signed on 25 June 2021, complements the existing Partnership in Partners-in-Government agreement in place between the LGAQ and the Queensland Government to provide a platform to ensure issues of priority for these communities are properly considered by the Government when developing policies, programs, and legislation.

The Rural and Remote Councils Compact, pledges to amplify the voice of and improve outcomes for the state's 45 rural and remote councils and their local communities by enhancing engagement between both levels of government.

¹ [Rural and Remote Councils Compact \(2021\)](#)

Submission to the Better Delivery of Universal Services Discussion Paper

1.0 Executive Summary

The LGAQ welcomes the opportunity to provide feedback to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts on the *Discussion Paper: Better delivery of universal services* (the Discussion Paper), released for consultation in October 2023.

The LGAQ understands the Discussion Paper has been developed to seek views on the key outcomes that a modern universal service arrangement should cover and the best way to deliver those services, recognising changes in available technologies and consumer preferences over recent years.

The review of universal service arrangements, including the Universal Service Obligation (USO) that has been in place since the 1990's, is of significant interest to the LGAQ and Queensland councils.

For far too long, growth and investment in regional, rural, remote and First Nations communities have been stifled by the telecommunications and digital divide. Queensland councils recognise the fundamental role played by 'telecommunications' infrastructure, as an enabler of economic development and in the provision of health, education and emergency services in regional, rural and remote areas of Queensland and in First Nations communities.

The LGAQ acknowledges and appreciates the considerable and ongoing investment by the Federal Government in telecommunications connectivity through key initiatives including the Better Connectivity Plan for Regional and Rural Australia², which includes \$656 million provided in the 2022–23 October Budget over five years to improve mobile and broadband connectivity and resilience in rural and regional Australia, and critical funding programs such as the Mobile Black Spot Program, Regional Connectivity Program and the Telecommunications Disaster Resilience Innovation (TDRI) Program.

It is critical that investment by State and Federal governments continues to support improved access, quality, coverage, resilience and innovation of telecommunications infrastructure and services.

In January 2024, the LGAQ launched a landmark piece of research³ which quantifies the impact of cost shifting onto councils and the communities they serve. It found that local governments across Queensland are stepping in to provide extra services to ensure our communities remain liveable – and in many cases are using their limited resources to fund services that are not their responsibility to fund. This, of course, jeopardises their ability to deliver core council infrastructure and services.

The survey, completed by 75 per cent of councils across Queensland and analysed by leading research consultancy AEC Group, found that cost shifting onto councils has increased by 378 percent over the past two decades.

² [Better Connectivity Plan for Regional and Rural Australia](#)

³ [LGAQ Cost Shifting Research Report \(2024\)](#)

As the level of government that is funded the least – earning around three cents in every dollar of taxation revenue compared with 80 cents for the Federal Government and almost 17 cents for the State – councils cannot continue to shoulder further cost burdens.

In this submission, the LGAQ has prepared detailed comments in relation to the questions outlined in the Discussion Paper, highlighting critical, long-term and ongoing issues that are being experienced across local communities and opportunities and reforms that should be considered as part of a modern universal service arrangement.

The LGAQ looks forward to continuing to engage with the Federal Government and the 2024 Regional Telecommunications Independent Review Committee, on matters raised in this submission as well as regarding other challenges/opportunities for local communities, as the 2024 Regional Telecommunications Review progresses.

1.1 Recommendations

In total, the LGAQ has made 17 key recommendations in response to the Discussion Paper, summarised below:

- **Recommendation 1:** The LGAQ recommends the Federal Government ensures a modern universal framework delivers equity and improved coverage, reliability, resilience and affordability of telecommunications services across Queensland's regions, in a way that reflects changes in technology and addresses the needs of local communities.
- **Recommendation 2:** The LGAQ recommends the Federal Government protects the basic modern human right of access to communication through requiring providers to adhere to universal service obligation (USO) requirements for any publicly funded infrastructure, whether partially or wholly funded.
- **Recommendation 3:** The LGAQ recommends the Federal Government undertakes detailed and ongoing engagement with the community and Queensland councils as part of the 2024 Regional Telecommunications Review including for example, through in person consultation sessions and regional forums.
- **Recommendation 4:** The LGAQ recommends the Federal Government continues to invest in the development of new technologies to provide solutions for telecommunications disaster resilience across Queensland, recognising Queensland is Australia's most disaster-prone state.
- **Recommendation 5:** The LGAQ recommends the Federal Government includes requirements on telecommunication providers to maintain a level of network resiliency or provide redundancy options on their networks as an important safety net under the universal service framework.
- **Recommendation 6:** The LGAQ recommends the Federal Government extends the universal service arrangements to include a customer service guarantee for mobile (calls and data) network services and connectivity, including a maximum outage permitted for mobile telephony.
- **Recommendation 7:** The LGAQ recommends the Federal Government continues to commit ongoing and increased funding to improve connectivity outcomes across Queensland's regions, in particular narrowing black spot coverage areas, through programs such as the Mobile Black Spot Program and the Regional Connectivity Program.
- **Recommendation 8:** The LGAQ recommends the Federal Government mandates all mobile phone carriers to properly address and resolve key mobile black spots within shorter timeframes and ensures the response times for restoration and/or repair to

landline and mobile network infrastructure aligns with the USO and the funding conditions through the mobile black spot program.

- **Recommendation 9:** The LGAQ recommends the Federal Government improves the funding application and approval process for the Mobile Black Spot Program to ensure infrastructure is going to the communities in most need, with genuine consultation with, and a sign off from, the relevant local government.
- **Recommendation 10:** The LGAQ recommends the Federal Government continues to examine ways that mobile roaming may be trialled in regional areas and along regional access roadways and highways to support regional communities and improve safety of tourists travelling in remote areas.
- **Recommendation 11:** The LGAQ recommends the Federal Government considers including a requirement on mobile network operators to provide competitors with better access to their mobile infrastructure in regional areas, in order to better support and enable mobile roaming.
- **Recommendation 12:** The LGAQ recommends the Federal Government takes into account council feedback as outlined in this submission, the individual submissions of Queensland councils and the future consultation undertaken as part of the 2024 Regional Telecommunications Review.
- **Recommendation 13:** The LGAQ recommends the Federal Government ensures that the modern universal services framework does not shift costs onto Queensland councils to provide funding for telecommunication services, recognising this is not the role of local government.
- **Recommendation 14:** The LGAQ recommends the Federal Government ensures there is genuine, meaningful and targeted engagement with affected Queensland councils regarding any proposed changes to the payphone network within their local government area.
- **Recommendation 15:** The LGAQ recommends the Federal Government ensures that affordability is considered and addressed as part of a modern universal services framework.
- **Recommendation 16:** The LGAQ recommends the Federal Government ensures a modern universal service framework meets the digital inclusion needs of First Nations communities and delivers on the Closing the Gap target for Aboriginal and Torres Strait Islander people to have equal levels of digital inclusion by 2026.
- **Recommendation 17:** The LGAQ recommends the Federal Government continues to support the work of the First Nations Digital Inclusion Advisory Group and ensures there is meaningful and direct on-country engagement with First Nations communities and councils, including with Queensland's remote and discrete First Nations communities.

Please do not hesitate to contact Crystal Baker, Manager – Strategic Policy at crystal_baker@lgaq.asn.au or Mike Furniss, Policy Advisor – Infrastructure and Economic Development at mike_furniss@lgaq.asn.au or phone 1300 542 700 should you wish to discuss any aspect of this submission.

2.0 Introduction

Improved telecommunication services and digital connectivity remain a key priority for Queensland councils and local communities.

The LGAQ, therefore, strongly welcomes the opportunity to make this submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts on the *Discussion Paper: Better delivery of universal services* (the Discussion Paper).

The submission includes case studies and reflects local government feedback that has been offered as part of the current consultation process, as well as incorporating the agreed policy positions of local government captured through the LGAQ Policy Statement and previous LGAQ Annual Conference resolutions, as discussed further below.

2.1 LGAQ Policy Statement

The LGAQ Policy Statement⁴ is a definitive statement of the collective voice of local government in Queensland. The key policy positions of local government that are relevant in the context of the Better Delivery of Universal Services Discussion Paper, are as follows:

6.1 Planning Policy and Development (6.1.7 Telecommunications)

- 6.1.7.1 Local government acknowledges the fundamental role played by 'telecommunications' infrastructure as an enabler of economic development and in the provision of health, education and emergency services in rural and remote areas of Queensland.
- 6.1.7.2 Local government supports efficient planning assessment and installation of telecommunications infrastructure and is the appropriate sphere of government to determine the level of assessment to be applied to telecommunications facilities.
- 6.1.7.3 Local government supports co-location of telecommunications infrastructure and information sharing amongst the development industry, digital service providers, mobile network operators, telecommunications infrastructure providers and local government in order to minimise disruption to local communities and to maximise efficiencies.

8.4 Communication (8.4.1 Service Access)

- 8.4.1.1 Advances in technology should be applied to give remote areas access to telephone, television and internet services consistent with those available in urban areas.
- 8.4.1.2 Local government across Queensland experiences significant inequities in mobile phone coverage and reliability of services between rural and urban communities. Local government will engage the State and Federal governments to address this inequity.
- 8.4.1.3 Local government supports the concept of a system of uniform telephone charges throughout Australia to reduce the disparity of remote locations.

8.9 Regional Development

- 8.9.6 Digital infrastructure and technology are recognised as enablers to help overcome the barriers of remoteness, infrastructure shortfalls, attract regional investment and facilitate regional prosperity.
- 8.9.7 Local government supports the rollout of digital infrastructure, including but not limited to, the National Broadband Network and the provision of equitable access to high-

⁴ <https://www.lgaq.asn.au/downloads/file/569/lgaq-policy-statement>

speed broadband internet. This includes support from the Federal and State governments in developing the digital economy and online service delivery for local government.

2.2 Relevant LGAQ Annual Conference Resolutions

The LGAQ is committed to member-driven advocacy and working with members to build stronger local government and more resilient local communities. At recent LGAQ Annual Conferences, Queensland councils have passed several resolutions directly relevant to the questions raised in the Discussion Paper. These resolutions are listed below.

Resolution 148 (2023) – Improving access and reliability of telecommunications infrastructure and services

The LGAQ calls on the State and Federal governments to ensure reliable access to telecommunications infrastructure/services and improved mobile coverage in urban, regional and rural areas, by:

- *mandating all mobile phone carriers to properly address and resolve key mobile black spots within shorter timeframes;*
- *revising the funding approval process for the Mobile Black Spot Program to include a sign off from the local government area that the infrastructure proposed will be located in as part of the process;*
- *increasing funding for connectivity in regional areas, in particular narrowing black spot coverage areas;*
applying and ensuring telecommunication providers comply with a Community Service Obligation (CSO)/Universal Service Obligation (USO) when supplying publicly-funded communications infrastructure/services, whether partially or wholly funded.

Resolution 17 (2023) – Communication providers’ preparedness to ensure capability to respond during disasters

The LGAQ calls on the Federal Government to ensure the response times for restoration and/or repair to landline and mobile network infrastructure align with the Universal Service Obligations (USO) and the funding conditions through the mobile black spot program.

Resolution 27 (2022) – Cyber Security Local Shared Services – Security Operations Centre

The LGAQ calls on the State and Federal governments to develop and resource an expert Security Operations Centre (SOC) for local government authorities as a shared services concept to improve cyber security management.

Resolution 81 (2022) – Better engagement for Mobile Blackspot Program projects

The LGAQ calls on the State and Federal governments to:

1. *To ensure there is meaningful engagement with the community – implement a notification or “tick off” process by the Federal MP and affected councils for the consultation aspect of any project application in development.*
2. *Include on the ground testing to ensure value for money in the location of this infrastructure which is designed to increase connectivity and reduce the digital divide.*

Resolution 135 (2022) – Funding for Digital Connectivity in Regional Areas

The LGAQ to calls on the State and Federal governments to increase funding for connectivity in regional areas, in particular regions covering widespread agricultural land.

Resolution 58 (2021) Telecommunications – Mobile Service Level Guarantee

That the LGAQ calls on the Australian Communications and Media Authority (ACMA) and telecommunications providers to commit to a customer service guarantee for mobile (calls and data) network services.

Resolution 69 (2020) – Telecommunication – Support Mandatory Roaming Services Between Mobile Telecommunication Providers

That the LGAQ lobby the Federal Government to legislate to require telecommunication operators to provide access to their mobile infrastructure in regional areas for competitors to enable roaming.

3.0 LGAQ Response to Consultation Questions

Improved access and reliability of telecommunications infrastructure and services remains an ongoing and critical priority for Queensland councils.

Digital infrastructure and technology are recognised as enablers to help overcome the barriers of remoteness, infrastructure shortfalls, attract regional investment and facilitate regional prosperity however, local communities across Queensland's urban, regional, rural, remote and First Nations communities experience significant inequities in the accessibility, reliability and affordability of these services.

The current consultation process, seeking feedback on ways to better deliver baseline universal telecommunication services, represents an important opportunity to highlight key issues that continue to be experienced across Queensland's regions and opportunities to achieve more equitable outcomes.

The LGAQ has structured this submission based on the seven key questions for stakeholders outlined in the Discussion Paper and summarised below:

1. What do you consider are the key outcomes that a modern universal service framework should deliver?
2. What safety-net services does a modern universal service framework need to address?
3. To what extent do you consider mobile services are important to complement fixed services supported under the existing framework?
4. Which existing requirements under the current universal service framework should be retained, or changed?
5. What role do you consider payphones should play in a modern universal service framework?
6. How should affordability be considered?
7. How can a modern universal service framework deliver better outcomes and meet digital inclusion needs of First Nations Australians?

3.1 Key outcomes for a modern universal service framework

For Queensland councils, in Australia's most decentralised state, it is critical that a universal service framework supports universal access to reliable and affordable voice and broadband services for people statewide, including First Nations peoples and communities, regardless of location or socio-economic status.

Fast and reliable connectivity that is widespread, robust, high quality, fit-for-purpose and meets the needs and expectations of communities, is critical in supporting, attracting and retaining residents and local workforces to, for example, conduct business and education activities, maintain social connectivity and interactions as well as support disaster management, safety, and recovery initiatives.

Mobile and other technologies such as Low Earth Orbit Satellite (LEOSat) services, are providing greater options and alternatives to fixed standard telephone services and can support connectivity across regional, rural and remote communities, including First Nations communities.

LEOSats offering higher speeds and lower latency compared to geostationary satellites (which as noted in the Discussion Paper are important in supporting quality voice communications)

would ensure that regional, rural, remote and First Nations communities are not limited to services that have traditionally created unreliable and ineffective connections, in their region.

The availability of wide-reaching and better performing services such as LEOSats would help ensure regional, rural remote and First Nations communities have better and faster access to emergency and disaster preparedness initiatives.

The LGAQ is currently working with the State Government to deliver the Rapid Lower Earth Orbit (LEO) Deployment Project to support remote and discrete First Nations communities, with a focus on delivering the following key objectives:

1. Develop a funding program/incentive scheme that will enable communities to access LEO satellite connectivity to high-priority community locations to provide more effective and reliable fixed broadband coverage;
2. Deliver a timely application and approval process so communities can access funding for equipment purchasing installation and 36 months of service; and
3. Provide funding support for the installation of up to 5 pieces of equipment (noting there will be a higher allocation to the Torres Strait region) within funding limits to each community.

The Rapid LEO Deployment Project is a great pilot project that demonstrates what benefits could be achieved for remote communities if the federal government were to support further roll-outs.

See **Case Study 1** below for further information about the Rapid LEO Deployment Project and the benefits of this innovation for local communities.

Case Study 1: Rapid Lower Earth Orbit Deployment Project

The Queensland Government Customer and Digital Group (QGCDG) leads and drives a more digitally enabled and responsive government, whilst facilitating simple and effective access to services for all Queenslanders.

Through its work in the Customer and Digital Strategy stream, QGCDG undertook an analysis of digital connectivity and readiness of Queensland's remote and discrete First Nations communities. This analysis identified the immediate need to provide internet connectivity to high-priority community locations as an interim solution while larger Commonwealth Government and telecommunications vendor programs deliver new digital infrastructure.

Lower Earth Orbit (LEO) satellite connectivity has been identified as the appropriate solution and the QGCDG has established partnership with the LGAQ. Work is already underway to support several First Nations communities with some examples below.

RLEOD Program – Wujal Wujal Aboriginal Shire Council

On the evening of 13 December 2023, Tropical Cyclone Jasper made landfall along the Queensland coast near Wujal Wujal, triggering widespread flooding that devastated the town causing the town's almost 300 residents to be evacuated. In response, leaders from the Wujal Wujal Aboriginal Shire Council, alongside numerous volunteers, worked tirelessly to initiate disaster recovery efforts within the community. To facilitate communication and coordination of emergency response efforts, the LGAQ's Rapid LEO Deployment project promptly installed a portable Starlink unit, enabling crucial connectivity for remote communities during this time of crisis.



RLEOD Program – Mornington Shire Council

Mornington Shire Council offers two accommodation options for visitors to Gununa – i.e. Mornington Council Motel and Visitors Accommodation. As a vital asset owned by the council, the team facilitates administrative tasks like online bookings and payments and manages contractors for necessary maintenance and improvements. Resources like this accommodation provides important income for the council and are essential for the council's financial stability. To bolster operational efficiency for the Mornington Council Motel and Visitors Accommodation, the council will soon receive a Standard Starlink Unit through the Rapid LEO Project.

Based on feedback from councils in preparing this submission, a modern universal service framework should include but not be limited to, the following elements, which are discussed in more detail throughout the submission:

- improved network resilience (including reliability of power supply) and communication providers' preparedness/response capability to adequately restore and repair telecommunications infrastructure and services as soon as possible after a disaster event – and within the timeframes provided;
- support for the evolution of telecommunications technologies, allowing for upgrade and adaption and including customer service guarantee for mobile (calls and data) network services;
- meaningful engagement with the community and affected councils;
- improved consistency in quality standards for voice and broadband, including minimum speeds and reliability guarantees;
- transparency in pricing from service providers, making it easier to compare the cost and the level of services provided particularly in regional areas.

In addition, issues relating to cyber security have also been raised, with some feedback suggesting a modern universal service framework should address privacy and security concerns of customers and ensure a certain level of protection as a minimum service.

The LGAQ, therefore, supports modernisation of the universal service framework to ensure equity and improved coverage, reliability, resilience and affordability of telecommunication services across Queensland's regions, and makes the following overarching recommendations:

Recommendation 1: The LGAQ recommends the Federal Government ensures a modern universal framework delivers equity and improved coverage, reliability, resilience and affordability of telecommunications services across Queensland's regions, in a way that reflects changes in technology and addresses the needs of local communities.

Recommendation 2: The LGAQ recommends the Federal Government protects the basic modern human right of access to communication through requiring providers to adhere to universal service obligation (USO) requirements for any publicly funded infrastructure, whether partially or wholly funded.

Recommendation 3: The LGAQ recommends the Federal Government undertakes detailed and ongoing engagement with the community and Queensland councils as part of the 2024 Regional Telecommunications Review including for example, through in person consultation sessions and regional forums.

3.2 Safety net services

Under current arrangements, there are no regulatory requirements on network operators to maintain a level of network resiliency or provide redundancy options on their networks.

As noted in the Discussion Paper (page 12), *“while no communications network is 100 per cent resilient to weather events, climatic conditions, or natural disasters, it is important that networks are prepared as much as possible against the impacts of power outages and other disruptions to ensure people remain connected”*.

During, or after a natural disaster is when the power supply is most likely to fail, and this is a critical time when information dissemination to residents is essential. The loss of power, such as that experienced in Charleville for 18 hours in December 2023, for example, can lead to a complete loss of communication capability. In early 2023, Burke Shire Council also experienced catastrophic monsoonal flooding that left the community without telecommunication services for 28 days (even longer in some parts of the Shire).

These examples highlight the need for communication service providers to ensure they evolve the way they respond to outages/maintenance and the prevailing weather conditions, but also have ready and reliable access to transportation methods that ensure timely, efficient and effective response. This is essential to mitigate length of time services are unavailable and the associated risk to not only businesses but also the health and safety of residents and travellers.

For community members, it is essential that during times of natural disasters they remain connected, particularly regarding lifesaving services and assistance. This is even more important in regions where climatic conditions increase the likelihood, frequency and length of outages.

The LGAQ appreciates the Federal Governments’ commitment to promoting the development of new technologies to provide solutions for telecommunications disaster resilience, (particularly in regional, remote and First Nations communities), through the \$50 million Telecommunications Disaster Resilience Innovation (TDRI) program that was announced and funded under the Australian Government’s *Better Connectivity Plan for Regional and Rural Australia*⁵. It is important that there is continued investment in these technologies throughout Queensland, recognising Queensland is the most disaster-prone state in Australia.

Recommendation 4: The LGAQ recommends the Federal Government continues to invest in the development of new technologies to provide solutions for telecommunications disaster resilience across Queensland, recognising Queensland is Australia’s most disaster-prone state.

⁵ [Better Connectivity Plan for Regional and Rural Australia](#)

A modern universal framework should consider including requirements on telecommunication network operators to maintain a level of network resiliency or provide redundancy options on their networks as an important safety net, for example, through provision of alternative power supplies (such as battery, generator and/or solar power), to ensure communications don't go down when they are needed the most.

First Nations communities are especially vulnerable to loss of connectivity, as infrastructure in these communities is often at risk, and connections to networks are easily taken out of commission. Feedback suggests that issues can be solved by better use of infrastructure and more resilient designs for mobile towers, as well as increased co-location on towers, and better use of back-up systems like power generation.

This was reinforced by Queensland councils at the 2023 Annual Conference, with a resolution passed highlighting the importance of resilience and back-up systems in the telecommunications and power network to withstand and/or rebound and return to service quickly following a natural disaster or extreme weather event.

Recommendation 5: The LGAQ recommends the Federal Government includes requirements on telecommunication providers to maintain a level of network resiliency or provide redundancy options on their networks as an important safety net under the universal service framework.

As noted in feedback to the LGAQ in preparing this submission, councils have also identified the importance of mobile connectivity acting as a safety net. Feedback specifically in relation to mobile services is provided in section 3.3 below.

3.3 Mobile services

In addition to lacking requirements for network resiliency or redundancy, the USO also does not include statutory obligations on telecommunication providers in relation mobile telephony. Access to mobile coverage and the reliability of mobile services is, however, essential, especially in areas where fixed voice and data infrastructure is limited or not commercially viable.

Recommendation 6: The LGAQ recommends the Federal Government extends the universal service arrangements to include and commit to a customer service guarantee for mobile (calls and data) network services and connectivity, including a maximum outage permitted for mobile telephony.

Regional areas in Australia and Queensland contribute significantly to the economy, with the Regional Australia Institute (RAI)⁶ estimating that regional Australia accounts for around 40 per cent of national economic output and employs around one third of Australia's workforce. Agricultural industries have traditionally been the driving force of economic growth across regional areas and continue to hold a strong place in Australia's economy, covering 12 per cent of goods and services exported in 2020-21.

Mobile services are a well-established, critical tool for businesses including the multi-billion-dollar agriculture and tourism sectors, with major costs incurred from service outages. Feedback from council officers also highlights the importance of reliability in the mobile network, with current networks experiencing congestion issues in busy periods and inconsistencies in the level of support and access costs across different providers.

⁶ [RAI Report: 2011-2021 A decade of Achievement \(September 2021\)](#)

COVID-19 has accelerated opportunities for Australians to study and work remotely, providing a great opportunity for regional areas to attract and retain local populations but also placing further pressure on existing infrastructure in the regions. The RAI estimates that one out of five households in metropolitan areas is considering moving regionally⁷, however, without suitable access to cost-effective telecommunications, towns are finding it very difficult to retain and attract residents.

In a recent submission on the Regional Connectivity Program Round 3 (including Mobile Black Spot opportunities) Grant Opportunity Draft Guidelines⁸, the LGAQ highlighted the ongoing calls of Queensland councils for affordable, accessible, and reliable connectivity as well as improved mobile phone coverage, recognising this remains a significant issue across many regional, rural, remote and First Nations communities.

Case Study 2 below, highlights the importance of reliable mobile services to ensure strong and diverse regional economies and allow communities to remain connected during emergency situations and disaster events.

Case Study 2: The importance of mobile services in the Western Downs Region

The Western Downs region is located 2.5 hours west of Brisbane and measures 38,000 square kilometre with a population of 34,584. The region contributes significantly to the national economy. The GRP has increased by 12% over the past year to \$3.68b and the region lists \$6.9b of developments at various stages in the pipeline. The region's economy is underpinned by agriculture, intensive agriculture, energy and manufacturing industries and also has well developed tourism and event products that span across the entire region.

Despite being an economic powerhouse, the Western Downs region experiences significant gaps in internet and mobile coverage. The region is also highly susceptible to natural disasters with the region facing an unprecedented period of frequent high rainfall and multiple flood events in 2021/22 and further disasters in 2023 with several large bushfire events in February and March 2023 as well as in October and November 2023.

Fast and reliable mobile and internet (connectivity) services are vital to ensure a strong and diverse economy and to assist in ensuring a quality lifestyle for the community. Mobile services offer portability, and it has become critical from a safety perspective during these times that communities maintain connected while on the move and access to vital support services including emergency and healthcare services.

Across the Western Downs region, workplaces and towns benefit from mobile connectivity to ensure that the transient workers who have jobs in the region but live elsewhere, remain connected to the digital world. Fixed connections are unwarranted for these workers and therefore, individuals rely on mobile services.

While the population is 34,584, in the Western Downs region, it was estimated in 2020 that around 20% of the jobs in the region were filled by workers from outside the region. It is therefore imperative that mobile connectivity in the region remains capable of servicing any further unanticipated connections in the area, as well as visitors during their stay.

The LGAQ acknowledges and welcomes the delivery of improved telecommunications infrastructure as part of targeted funding initiatives such as the Mobile Black Spot Program

⁷ [RAI Media Release 'As the cost-of-living bites, city dwellers consider a move to regional Australia' \(May 2023\)](#)

⁸ [LGAQ Submission to Regional Connectivity Program Round 3 Grant Opportunity Draft Guidelines \(February 2023\)](#)

(MBSP). Whilst the MBSP is not formally part of the USO, the LGAQ understands that it is an important and complementary program, and it is therefore critical that the MBSP (and other regional connectivity programs) continues to be supported through ongoing funding streams by the Federal Government to guarantee improved outcomes.

In addition, the Federal Government should ensure guaranteed maintenance, upgrades and repairs are carried out on this infrastructure to reflect the value of this public investment.

Recommendation 7: The LGAQ recommends the Federal Government continues to commit ongoing and increased funding to improve connectivity outcomes across Queensland's regions, in particular narrowing black spot coverage areas, through programs such as the Mobile Black Spot Program and the Regional Connectivity Program.

Recommendation 8: The LGAQ recommends the Federal Government mandates all mobile phone carriers to properly address and resolve key mobile black spots within shorter timeframes and ensures the response times for restoration and/or repair to landline and mobile network infrastructure align with the USO and the funding conditions through the mobile black spot program.

As part of the application process for the MBSP, it is also critical that relevant local governments are closely consulted, particularly in relation to the type of coverage and the planned location of mobile network operator assets.

The LGAQ is aware of a previous MBSP funded project where the location was poorly selected due to a lack of meaningful consultation with local government, and as a result the funding resulted in the construction of towers with limited coverage. If consultation had been conducted, an increased number of viable options available to the project could have been identified including a better, more elevated location, which would have increased services across a wider area and improved the overall outcome of the project.

Recommendation 9: The LGAQ recommends the Federal Government improves the funding application and approval process for the Mobile Black Spot Program to ensure infrastructure is going to the communities in most need, with genuine consultation with, and a sign off from the relevant local government.

In the event of an emergency, mobile roaming would also help community members access support and coordinate responses, offer increased connectivity to emergency support workers as well as offer redundancies to any at-risk network.

The LGAQ has previously highlighted support for temporary mobile roaming services being provided during natural disasters and other such emergencies, in a submission to the Australian Competition and Consumer Commission (ACCC) Regional Mobile Infrastructure Inquiry in September 2022⁹. In response to the Inquiry, the LGAQ was pleased to see the Federal Government's commitment in October 2023¹⁰ to 'work with industry to scope an emergency mobile roaming capability to keep Australians connected during natural disasters' – the LGAQ notes this should also include consultation with Queensland councils.

Recommendation 10: The LGAQ recommends the Federal Government continues to examine ways that mobile roaming may be trialled in regional areas and along regional access roadways and highways to support regional communities and improve safety of tourists travelling in remote areas.

⁹ [LGAQ Submission to ACCC Regional Mobile Infrastructure Inquiry \(September 2022\)](#)

¹⁰ [Media Release: Government to scope emergency mobile roaming capability during natural disasters \(23 October 2023\)](#)

Recommendation 11: The LGAQ recommends the Federal Government considers including a requirement on mobile network operators to provide competitors with better access to their mobile infrastructure in regional areas, in order to better support and enable mobile roaming.

3.4 Existing requirements

The LGAQ understands the existing requirement is for Telstra to supply fixed voice services and payphones to people nationally on reasonable request. The USO ensures that fixed standard telephone services and payphones are accessible to all people in Australia regardless of where they reside or carry on business.

Access to fixed broadband is supported by the Statutory Infrastructure Provider (SIP) regime, which provides that NBN Co and other similar providers connect premises to their networks and supply wholesale services that allow retail providers to provide broadband services with peak download and upload speeds of at least 25/5 megabits per second (Mbps).

The Customer Service Guarantee (CSG) sets timeframes and associated benchmarks for connection, repair and appointment keeping for fixed standard telephone services. Where Telstra or another retail provider supplies CSG services, it must meet specified maximum timeframes or otherwise pay compensation to customers, unless an interim or alternative service is offered.

Based on feedback from council officers in preparing this submission, the following elements of the existing framework are considered important to retain/change:

- Retain the CSG with a focus on the timeframes expected for connections or repairs and what compensation is available to communities for failing to meet these timeframes.
- Retain the fixed standard telephone service access guarantee but expand the scope of universal services framework to also apply to mobile services.
- Retain services such as public payphone services, noting that while usage is declining, there is still an identifiable need to ensure that these services are provided and accessible for those that don't have access to a fixed service or cannot afford a service.
- Change the service performance standards to meet modern broadband expectations around speed and reliability, especially as a critical component of services like telehealth.

Recommendation 12: The LGAQ recommends the Federal Government takes into account council feedback as outlined in this submission, the individual submissions of Queensland councils and the future consultation undertaken as part of the 2024 Regional Telecommunications Review.

Additional considerations that should be included in a modern universal service framework are discussed in other sections of this submission, and include suggestions that:

- affordability of services be more strongly considered, to maintain the availability of connectivity to all who wish to access it regardless of socio-economic status.
- there be more stringent rules on how suppliers provide interim or alternative services and a resilient network to mitigate connectivity loss and ensure connection is maintained, including during times of natural disasters.
- the universal services framework includes an obligation to ensure access and reliability of mobile network services.

Existing gaps in the current framework, can adversely affect connectivity outcomes across local communities as highlighted in Case Study 3 below.

Case Study 3: Connectivity challenges in Carpentaria Shire Council

Reliable connectivity in the Carpentaria Shire town of Karumba continues to be an issue. This is despite the installation of an optic fibre cable between Normanton and Karumba in 2020 and upgrade to the Mobile Tower. The service provided in Karumba may be adequate for several months of the year, however it always fails miserably when the tourist season starts, and the population grows significantly for seven (7) months of the year. Local businesses find it difficult to process EFTPOS payments for a simple thing like a cup of coffee when the mobile network connection to their EFTPOS machine is lost due to poor connection.

Carpentaria Shire Council contributed \$900,000 of ratepayer's funds (along with a significant contribution from the State Government) towards the installation of the fibre optic cable in 2020. However, it is not responsibility of local government to fund telecommunication infrastructure for third parties and Carpentaria Shire will not receive any Return on Investment (ROI) in this infrastructure¹¹.

Mobile phone coverage when travelling between towns in rural and remote areas in Carpentaria Shire is also extremely limited with most losing connection between 20 and 30kms from town. Most community members and businesspeople work on the premise that there is no service or connection until you get to the next community and come back into a service area, this is a problem as most people have become used to an immediate response or reply and some could be losing business because they have lost connectivity with their client base or potential new customer.

Staying connected during natural disasters can be traumatic for some. The town of Karumba has an ageing population and extended family members often no longer live in the region, lose touch with family and friends for long periods and are not able to ascertain if they are safe and well during these times of natural disasters.

All too often it is difficult and somewhat frustrating to contact a call centre to complain about a service being provided (or not provided) by the telecommunications provider. Telstra representatives are often unaware of a problem with the network due to the limited number of complaints. This can be largely explained because people become frustrated with waiting to complain or are often given the run-around that they simply hang up and suffer with the limited service provided, but they do let the Council know, and we suffer similar issues with our provider.

The above case study illustrates the costs that can ultimately be borne by a local government to improve connectivity outcomes for their region, despite telecommunications not being a local government responsibility and with no return on investment. This represents a significant cost shift onto a level of government least able to afford it and is not financially sustainable.

Recommendation 13: The LGAQ recommends the Federal Government ensures that the modern universal services framework does not shift costs onto Queensland councils to provide funding for telecommunication services, recognising this is not the role of local government.

¹¹ [Carpentaria Shire Council – Regional Priorities and Opportunities Report \(May 2022\)](#)

3.5 Payphones

The LGAQ understands current USO arrangements require Telstra to supply, install and maintain USO payphones nationally.

Queensland councils have not provided LGAQ with any specific feedback regarding the role of payphones in a modern universal service framework, however general feedback indicates that payphones continue to provide a useful service, and an important safety net, especially to those who do not have access to other communication options.

Before any change to the status or availability of payphones are made, there would need to be genuine engagement with local communities and councils.

Recommendation 14: The LGAQ recommends the Federal Government ensures there is genuine, meaningful and targeted engagement with affected Queensland councils regarding any proposed changes to the payphone network within their local government area.

3.6 Affordability

Affordability is a critical element of a modern universal service framework. As noted in the Discussion Paper (page 12), “Telstra is not currently subject to any explicit legislative requirements on the pricing of fixed voice services (or related customer equipment) provided under the USO. However, given its USO requirement to provide reasonable access to STS, Telstra’s national pricing ensures that customers pay the same price for a baseline service regardless of whether they reside in an urban, regional or remote area of the country”.

In feedback provided to the LGAQ, council officers noted the importance of transparency in pricing from service providers, to make it easier to compare the cost and the level of services provided particularly in regional areas as well as consistency in pricing of baseline services for consumers regardless of location across urban, regional, rural, remote and First Nations communities.

In addition, a subsidised option for low-income earners, disadvantaged and remote consumers was also suggested in feedback received, emphasising this will allow better connectivity without causing financial hardship.

Recommendation 15: The LGAQ recommends the Federal Government ensures that affordability is considered and addressed as part of a modern universal services framework.

3.7 Better outcomes for First Nations communities

The LGAQ understands the Federal Government has commitment to equal levels of digital inclusion for First Nations people by 2026 and also established a First Nations Digital Inclusion Advisory Group (the Advisory Group) in January 2023, to focus on Outcome 17 of the National Agreement on Closing the Gap.

As noted in the Advisory Group’s initial report, provided to the Hon. Hon Michelle Rowland MP, Minister for Communications in August 2023¹², “*digital exclusion affects the ability of First Nations people to participate in the online economy; access government services (which are increasingly moving online); access other services, such as education and employment; enjoy entertainment and leisure activities; and remain connected to our communities and culture.*”

¹² [First Nations Digital Inclusion Advisory Group Initial Report \(August 2023\)](#)

Addressing digital inclusion will help support improved outcomes across a range of Closing the Gap targets, including health and education.”

In addition, the report recognises First Nations people, particularly those in remote and discrete First Nations communities, favour mobile services over other options and are therefore disproportionately affected by the exclusion of mobile services from the USO and its successor, the Universal Service Guarantee (USG).

The LGAQ supports the Advisory Group finding that *“there is a need to review the effectiveness of the USG for ensuring universal access to affordable and reliable data services”*, and notes the Advisory Group recommendations relate to the following three key areas:

- delivering targeted or tailored measures to improve access to connectivity across a wide range of communities, ensuring access is affordable and fit for purpose and that First Nations people are aware of connectivity options and have digital skills to access the internet safely;
- improving the national collection and use of data so that we can better assess the impact of measures delivered in community, as well as broader progress towards Target 17; and
- ensuring genuine engagement and collaboration with First Nations people and communities and supporting their access to government programs and opportunities.

Recommendation 16: The LGAQ recommends the Federal Government ensures a modern universal service framework meets the digital inclusion needs of First Nations communities and delivers on the Closing the Gap target for Aboriginal and Torres Strait Islander people to have equal levels of digital inclusion by 2026.

Recommendation 17: The LGAQ recommends the Federal Government continues to support the work of the First Nations Digital Inclusion Advisory Group and ensures there is meaningful and direct on-country engagement with First Nations communities and councils, including with Queensland’s remote and discrete First Nations communities.

4.0 Conclusion

The LGAQ supports a modern universal framework that delivers equity and improved coverage, reliability, resilience and affordability of telecommunications services across Queensland’s regions, and which reflects changes in technology and addresses the needs of local communities.

The LGAQ looks forward to continuing to engage with the Federal Government and the 2024 Regional Telecommunications Independent Review Committee, on matters raised in this submission and other challenges/opportunities for local communities, as the 2024 Regional Telecommunications Review progresses.