

1 March 2024

Department of Infrastructure, Transport, Regional Development, Communication and the Arts (DITRDCA)  
Email: [usb@infrastructure.gov.au](mailto:usb@infrastructure.gov.au)

Dear Better Delivery of Universal Services Team,

The National Rural Health Alliance (the Alliance) welcomes the opportunity to make comment to the **Better Delivery of Universal Services Consultation**.

The Alliance comprises 51 Members<sup>1</sup>, and our vision is for healthy and sustainable rural, remote and regional (hereafter rural) communities across Australia. The Alliance is focused on advancing rural health reform to achieve equitable health access and outcomes for rural communities, that is, the 7 million people residing outside our major cities.

In considering how to respond to your consultation, I was reminded of a submission that the Alliance made to the **Productivity Commission 5-year Productivity Inquiry – Australia's Data and Digital Dividend Interim Report (October 2022)** and I wanted to take the opportunity to provide a copy of this submission which I believe outlines many of the key issues of relevance to rural communities in relation to universal service obligations. In particular, the attached submission provided feedback about critical issues regarding access to healthcare and the importance of ensuring healthcare providers in rural Australia can provide appropriate care and treatment to their community, including digital health options.

Further, the Alliance is supportive of the work undertaken by the Australian Communications Consumer Action Network (ACCAN) and we endorse the key findings and recommendations which will form the basis of their submission to your consultation. In summary, I believe Universal Service Obligations (USO) should:

- Focus on the capabilities a USO should deliver, such as access to digital health, education, and government services. These are basic and crucial services which all populations should have equitable access to.
- Consider a technology-neutral approach to the delivery of a standard communication service. This will reduce incompatibility, consumer confusion and will address and reflect place-based need, and not the technology driving the approach.
- Develop a dynamic institutional framework that sets minimum standards for contemporary and equitable service needs, but also allows for uplift to an equitable service capability and standards as technology and community expectations evolve.
- Avoid the development of a provider neutral/agnostic model, which could lead to an accountability problem in the delivery of communications services. Providers have a social contract to ensure rural, remote and regional Australia - that is 30 per cent of the Australian population - have equitable access.
- Ensure digital literacy education is prioritised to support rural communities understand the services available and their entitlements regarding access and quality.

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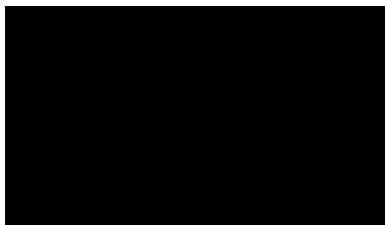
<sup>1</sup> Please see [www.ruralhealth.org.au/about/memberbodies](http://www.ruralhealth.org.au/about/memberbodies) for details

- A USO must extend to ensuring that rural Australians have access to essential communication channels in times of natural disasters and emergencies – which unfortunately are becoming more frequent and widespread, and this needs to be factored into our national infrastructure planning.

As a final point, I would like to draw your attention to our neighbours in New Zealand and their initiative to dramatically increase internet capability in the regional city of Dunedin.<sup>2</sup> There could be lessons in what the Dunedin example has been able to achieve which could be replicated in Australia. We have the capacity to build thriving regions in Australia which attract economic investment, new businesses and high-quality, accessible health care services to support these communities.

I would be pleased to provide further information or background to any of the information contained in this letter and the attachment if you require it.

Yours sincerely,



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National Rural Health Alliance

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[www.ruralhealth.org.au](http://www.ruralhealth.org.au)

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<sup>2</sup>

See this website for details: <https://www.beehive.govt.nz/release/all-dunedin-residents-can-now-access-ufb>