29th February 2024

Department of Infrastructure, Transport, Regional Development, Communications, and the Arts
GPO Box 594
Canberra ACT 2601

Via: usb@infrastructure.gov.au

Re: Consultation on Better Delivery of Universal Services

This submission by Regional Development Australia Southern Inland (RDASI) is to provide feedback on ways to better deliver baseline universal telecommunications services.

RDASI is represented by local leaders and staff who are passionate about the communities in the Southern Inland region of New South Wales (NSW). Part of a national network of 52 Regional Development Australia (RDA) Boards across Australia, RDASI's role is to support the Local Government Areas (LGAs) in the Southern Inland region of NSW, including Wingecarribee, Goulburn Mulwaree, Upper Lachlan, Hilltops, Yass Valley, Queanbeyan-Palerang, and Snowy Monaro. RDASI works with all levels of government, business, and community groups to promote economic and social development in the region by facilitating regional projects, collaboration, communication, and advocacy.

As part of this submission we present results from a regionally targeted survey designed to gather feedback from residents on issues and impacts of mobile connectivity in new developments, that was conducted to inform RDASI's submission, Telecommunications in New Developments (TIND) Policy Amendments.

We also address the questions presented in the 'Better delivery of universal services—discussion paper' document, provided on the Department of Infrastructure, Transport, Regional Development, Communications, and the Arts website.

We welcome and thank the Department for the opportunity to provide feedback as part of this consultation process.

Issues and impacts of limited services | RDASI region

Equitable access to reliable telecommunication services is critical for all Australians, particularly for people living and working in regional and remote Australia.

To highlight the need for these essential services, we would like to present information gathered as part of a regional survey conducted by RDASI to inform our Telecommunications in New Developments (TIND) Policy Amendments submission.

RDASI distributed a survey relating to connectivity in new development to community members from across the RDASI region. The survey incorporated a series of questions which included multiple choice answers, with the option for respondents to contribute their own free text comments. People over 18 years of age who experienced issues with connectivity in new houses and / or developments across the RDASI region were invited to participate.

The survey received responses from all local government areas within the RDASI region, apart from Upper Lachlan Shire Council. The age of the respondents was as follows:

- 65 year or older – 22.22%
- 55-64 years – 16.67%
- 45 – 54 years – 22.22%
- 35-44 years – 27.78%
- 25 – 34 years – 11.11%
- 18 – 25 years – 0%

Below are some of the questions that were included to better understand the issues and impacts of limited phone connectivity experienced across the region, and the responses collected.

Q: What issues have you experienced with mobile phone coverage?
Responses:

- No coverage anywhere in the new house or in the yard – 5.88%
- Coverage only in certain areas of the house – 17.65%
- Coverage only in certain areas of the yard – 0%
- Coverage only in certain areas of the house and yard – 41.18%
- Other – 35.29%

Some issues / comments provided in a free text form by this group include:

  o No coverage at times.
  o Not much phone reception in the house.

Q: Have you encountered any risks as a result of inadequate mobile coverage at your house?
 Responses:

- No – 47.06%
- Yes. Please tell us what happened – 52.94%

Some risks / comments provided in a free text form include:

- o Need for emergency services.
- o Missed out an interview for promotion in health sector.
- o Car accidents on the main Highway Monaro Highway 200 metres from our house and unable to contact emergency services and get help.
- o Safety.
- o Unable to contact important people.
- o Property has no landline so dependent on mobile and data via dish.
- o My wife is type 1 diabetic and was going "hypo" and she couldn't call me.
- o Can't answer phone calls.
- o My husband was trying to call me to let me know our daughter was not well, but he was not able to get in touch with me as I was down at the other end of the house. He had to run down to wake me up so I could come up, assess the situation, and then call an ambulance from the front of the house where there is reception.

Q: Have you encountered any other impacts as a result of inadequate mobile coverage at your house?

Responses:
- • No – 11.76%
- • Yes. (please specify) – 88.24%:

Some impacts / comments provided in a free text form include:
- o Intermittent internet on my mobile.
- o I operate my business from home and the service is poor and calls drop out with regularity.
- o Drop out.
- o Being a solo mother, I rely on my phone to get support if required.
- o Unable to receive calls relating to work when I'm on call.
- o Technology i.e., GPS - on our new tractor for cropping operations unable to connect to be operational. Unable to work from home as terrible connectivity.
- o Difficult to check on family and friends, and hard to call anyone for help.
- o The loss of business and downtime of dealing with clients.
- o Hard to connect to the internet.
- o Impacts on managing property e.g., security and internet.
- o When we have power outages (and we get many here) we can't receive calls on landline cordless phones, so we need to start generators and there is no mobile as backup.
- o Very hard to run a business when the phone doesn't work, loss of income.
- o Inability to work from home effectively.
- o Can't answer the calls due to poor reception.
- o Issues with completing my work as I work from home.

The survey focused on mobile phone coverage in new developments. With hindsight, it would be beneficial to understand if the respondents had investigated fixed line phone services as an alternative to mobile phone service, and what formed the basis of their decision for opting for a mobile phone service. Either way, the results suggest there are ongoing issues with access to reliable telecommunication services, despite the current consumer safe guards that are in place.

What are the key outcomes that a modern universal service framework should deliver?

With the survey results in mind, we believe a modern universal service framework should aim to deliver several key outcomes to ensure equitable access to essential telecommunication services. These outcomes include:

- Universal Access - Ensure all Australians, regardless of their location or socioeconomic status, have access to essential telecommunication services, including voice, broadband, and mobile connectivity.
- Affordability - Ensure telecommunication services are affordable, especially for low-income households and individuals, through various pricing structures, subsidies, and support mechanisms.
- Reliability and Quality - Provide reliable and high-quality telecommunication services that meet the needs of users, including voice call clarity, fast and stable internet connections, and minimal service disruptions.
- Safety and Security - Ensure telecommunication services support public safety and security, including access to emergency services, reliable communication during emergencies and natural disasters, and protection of personal data and privacy.
- Digital Inclusion - Promote digital inclusion by bridging the digital divide and ensuring that all individuals have the skills, resources, and opportunities to participate in the digital world, access online education, healthcare, government services, and employment opportunities.
- Innovation and Futureproofing - Encourage innovation and investment in telecommunication infrastructure to keep pace with technological advancements, support emerging technologies and future-proof the network for evolving user needs.
- First Nations Inclusion - Address the specific telecommunication needs and challenges faced by First Nations Australians, including remote and rural communities, and working towards closing the digital divide for Indigenous populations.
- Regulatory Compliance and Accountability - Establish clear regulatory frameworks, standards, and accountability mechanisms to ensure that telecommunication providers meet their obligations and deliver the promised services to all users.
- Sustainability - Ensure the long-term sustainability and viability of the telecommunication ecosystem, including balancing commercial interests with public service obligations and minimising environmental impacts.
- Stakeholder Engagement and Consultation - Engage with stakeholders, including government agencies, industry players, community organisations, and end-users, in the design, implementation, and evaluation of the universal service framework to reflect diverse perspectives and needs.
- Mandatory Information Provision - Require telecommunications service providers to provide clear and comprehensive information about consumer rights, available services, pricing, terms and conditions, and complaint procedures. This information should be easily accessible through websites, customer service channels, and printed materials.

A modern universal service framework should create an inclusive, accessible, and reliable telecommunication environment that safeguards community members and supports social, economic, and cultural development.

What safety-net services does a modern universal service framework need to address?

A modern universal service framework should address a range of safety-net services to ensure that Australians have access to essential telecommunications services, especially in regional and remote areas. Key safety-net services should include:

- Basic Voice Services: Ensure access to reliable and affordable basic voice services, including landline and mobile phone services, to facilitate communication for emergency situations, healthcare needs, and with essential and social contacts.
- Broadband Internet Access: Provide access to broadband internet services, including both fixed and mobile broadband, to support various activities such as telecommuting, distance learning, online healthcare consultations, accessing government and financial services, community engagement and social inclusion.
- Emergency Services Access: Guarantee access to emergency services such as police, fire, and medical assistance through telecommunications networks, including mobile phones and landlines.
- Public Safety Communications: Support public safety communications networks used by first responders and emergency services personnel to coordinate responses to disasters, accidents, and other emergencies. These networks should have priority access and robust coverage in all areas and include communication protocols to support disaster preparedness, early warning systems, and effective response coordination.

These safety-net services within the universal service framework ensure that all individuals have equitable access to essential telecommunications services that enables digital inclusion, enhanced public safety, and supports socio-economic development, regardless of their location and socioeconomic status.

To what extent do you consider mobile services are important to complement fixed services supported under the existing framework?

Mobile phone coverage should be an integral part of a modern universal service framework. We agree with the statement made on page 1 of the Better delivery of universal services discussion paper, 'consumer preferences are evolving, with many Australians increasingly relying on mobile and high-speed broadband services as their primary telecommunications services (with voice services often provided over broadband networks)'.

This is highlighted through responses to the previously mentioned survey. Responses demonstrate that people are relying on mobile services as their primary telecommunication service, and due to inadequate access to reliable mobile services, 52.94% of respondents encountered risks, including emergencies, and missed opportunities, and 88.24% reported difficulties in business operations, managing property, and staying connected with family and friends.

A comprehensive universal service framework should include provisions to address mobile phone coverage, ensuring Australians have access to reliable mobile telecommunications services regardless of their location. Measures should ensure adequate coverage, quality, and reliability of mobile networks, and mandate that providers educate end-users on all telecommunication options available for their location, so the consumer can make informed decisions.

Which existing requirements under the current universal service framework should be retained, or changed?

As the universal service framework is designed to ensure that all Australians have reliable and affordable access to standard telephone services (STS), payphones, and prescribed carriage services, regardless of their geographic location or socio-economic status, we believe that these existing requirements should be retained.

However, we believe that the existing framework should be amended to accommodate the rapid evolution of technology, ensuring government policies and regulations align with these and future advancements.

Embracing the most effective technology is essential. Enabling service providers to deliver phone and broadband services utilising the most advanced technologies, all while upholding necessary safeguards, is crucial to ensure that Australians in regional and remote areas have access to the latest and most suitable technologies.

What role do you consider payphones should play in a modern universal service framework?

Payphones play a multifaceted role in a modern universal service framework by providing essential communication services, promoting social inclusion, and enhancing public safety.

While the prevalence of mobile phones has reduced the reliance on payphones for everyday communication, they remain a critical component of the telecommunications ecosystem, particularly for individuals and communities facing access barriers to alternative communication options, providing an essential safety net for segments of the population and a vital communication channel during life-threatening situations, such as:

- Vulnerable and low-income groups
- Australians living in remote and regional areas
- International and domestic visitors
- Emergency situations
- Natural disasters

As such, ensuring the continued availability and maintenance of payphones is essential to uphold the principles of universal service and ensure equitable access to communication. To this effect, we acknowledge Telstra's commitment to supply, install and maintain USO payphones nationally and commend them on:

- the decision to make all local and national calls from payphones free of charge,
- making data from around 3,300 of its Wi-Fi enabled payphones across Australia free of charge, despite not being required or directly funded under USO arrangements, and

- Telstra's efforts and targeted investments to bolster the power resilience of around 1,000 payphones in disaster-prone areas, and to add Wi-Fi if not already available at those payphones.

How should affordability be considered?

Affordability is a crucial aspect as it directly impacts individuals' ability to access essential telecommunications services. Key considerations for ensuring affordability within the framework may include:

- Cost Structure – Mandates that ensure service providers offer basic telecommunications services at affordable rates to all Australians via tiered pricing plans with discounted rates or subsidies for those facing financial hardship.
- Transparent Pricing: Transparency in pricing structures to ensure consumers understand the costs associated with different service plans and usage patterns and are not impacted by hidden fees and charges. Billing practices should be easy to understand to prevent unexpected expenses for consumers.
- Regulatory Oversight - Measures to regulate pricing in the telecommunications sector, preventing exploitation, price gouging or unfair practices. Price caps, rate reviews, and competition policies can help promote affordability and prevent market abuses.
- Subsidies and Assistance Programs - Government subsidies and assistance programs that provide eligible applicants with direct financial assistance, discounted service plans, or subsidies for essential communication devices.
- Consumer Education and Awareness - Providers should be mandated to educate consumers about their rights, service options, assistance programs, and ways to best manage their telecommunications expenses effectively.

These considerations can assist in ensuring that telecommunications services remain affordable and accessible to all members of society, regardless of their financial circumstances or background.

How can a modern universal service framework deliver better outcomes and meet digital inclusion needs of First Nations Australians?

A modern universal service framework can be designed to specifically address the digital inclusion needs of First Nations Australians by implementing targeted policies and initiatives that promote access, affordability, and digital literacy within Indigenous communities. Key strategies to achieve this may include:

- Community Engagement and Consultation - Engage with First Nations communities in a meaningful and culturally sensitive manner to understand their unique telecommunications needs, challenges, and priorities.
- Infrastructure Investment in Remote Areas - Prioritise infrastructure investment in remote and regional Indigenous communities to improve access to reliable phone and high-speed broadband services.
- Culturally Appropriate Services: Develop telecommunications services and applications that are culturally appropriate and relevant to First Nations Australians.

- Affordability Measures: Implement measures to enhance affordability.
- Cultural Safety and Respect: Promote cultural safety and respect in the delivery of telecommunications services to Indigenous communities. This may include training service providers and customer support staff to understand and respect Indigenous cultures, protocols, and communication preferences, and ensuring that services are delivered in a culturally sensitive manner.
- Partnerships and Collaboration: Foster partnerships and collaboration between government agencies, telecommunications providers, Indigenous organisations, and community stakeholders to co-design and implement initiatives that address the digital inclusion needs of First Nations Australians.

Incorporating these strategies into a modern universal service framework will assist in ensuring that First Nations Australians have equitable access to telecommunications services, enabling them to participate fully in the digital economy, access essential online services, and preserve and share their cultural heritage in the digital age.

In Summary

Regional Development Australia Southern Inland (RDASI) works across a region encompassing 44,639 square kilometres, including seven local government areas in the south-east of NSW, home to over 210,000 Australians. Our mission is to support the development of this part of regional Australia, acting as a conduit between residents, business owners and government agencies, providing a connection point for growth, prosperity, and liveability. We drive jobs, investment, and innovation through collaboration, communication, advocacy, and the facilitation of regional projects. We strive to disseminate information and resources to our community members and provide unbiased support.

Reliable and resilient telecommunication services are of paramount importance to the RDASI community. Future universal services obligations should ensure there are consumer protections and safeguards in place that are simple and effective and deliver affordable and accessible options so that every member of our community can benefit from connectivity.

In this submission, we underscore the critical importance of equitable access to reliable telecommunication services for all Australians, especially those residing in regional and remote areas. Through a regionally targeted survey and addressing key questions, we highlight the pressing issues and impacts of limited phone connectivity experienced across the Southern Inland region of New South Wales (NSW). Our submission emphasises the need for a modern universal service framework that delivers key outcomes such as universal access, affordability, reliability, safety, digital inclusion, innovation, and regulatory compliance.

RDASI advocates for the retention of existing requirements under the current framework while advocating for necessary amendments to accommodate technological advancements. Additionally, our submission aims to emphasise the significance of mobile services, the role of payphones, affordability considerations, and strategies to meet the digital inclusion needs of First Nations Australians.

RDASI expresses our gratitude to the Department for the opportunity to contribute to the consultation process on better delivery of universal services. As representatives of the Southern Inland region of NSW, we remain committed to advocating for policies and initiatives that ensure equitable access to essential telecommunication services for all Australians. The challenges outlined in this submission and proposed recommendations support the development of a modern universal service framework that fosters social inclusion, economic prosperity, and digital equity across our diverse communities.

Thank you for considering our feedback, and we look forward to continued collaboration towards achieving these shared objectives.

Kind regards,

Carisa Wells
CEO and Director of Regional Development