

Better delivery of universal services discussion paper

Ricegrowers' Association Submission
February 2024



About the Ricegrowers, Association of Australia (RGA)

The RGA is the collective voice of rice growers in Australia. We represent the interests of around 1000 voluntary members, equating to roughly 98% of Australia's rice producers. Our main objective is to provide our members with strong and effective representation on issues affecting the viability of their businesses, communities and industry.

The RGA has eight branches across Northern Victoria, the Murray and Murrumbidgee Valleys of NSW. Each branch annually elects representatives to form the RGA Central Executive. The Central Executive represents their respective branches in determining RGA policy and projects. We operate as a member-based not-for-profit incorporated association governed by a grower-elected board.

Opening Comments

Thank you for the opportunity for the RGA to provide feedback to the Department's Discussion Paper on the better delivery of universal services.

The RGA's members live and work in rural areas and rely heavily on telecommunications to operate their farming businesses. Reliable telephone and broadband connectivity are critical, particularly for people living and working in regional, rural and remote (RRR) Australia.

Technology is evolving at an increasing pace, and the RGA understands the importance of Government policy and regulation to keep pace with these changes. A modern universal service framework should take a technology-agnostic approach, providing it exceeds existing reliability standards while ensuring certain safeguards are maintained. It delivers affordable and accessible options so that more members of our community can benefit from connectivity.

A modern universal service framework must ensure that communities in RRR areas do not fall behind those residing in urban areas.

Key questions for stakeholders

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

A modern universal service framework should guarantee that all Australians can access a basic set of communication services at affordable rates. This framework must safeguard areas without access to affordable and high-quality broadband and voice services.

The key outcomes that a modern universal service framework should deliver include providing access to affordable, accessible, reliable, resilient, and quality telecommunications services, regardless of where a person lives or works in Australia.

A modern universal service framework must focus on the resilience of telecommunications services, particularly during potential disasters, extreme weather events and power outages.

A modern universal service framework should have a technology-agnostic approach and focus on the reliability and level of service rather than how it is delivered ensuring certain safeguards are maintained. The framework should be dynamic and adequately respond to advancing technology and the evolving needs of communities.

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

A modern universal service framework must support a range of safety-net services to address specific challenges and ensure that all consumers, regardless of their circumstances, have access to essential communication services. Safety-net services that a framework should consider include:

Telephone services: Traditional telephone services are still in use, especially by residents RRR communities. If changes are made to these services, impact to these communities must be considered.

Emergency services: Access to reliable voice and broadband services for communication with emergency services to help keep Australians safe.

Unmetered access: Unmetered access to online government services. The number of government service centres in RRR communities has decreased in recent years.

Enabling unmetered access on government sites would ensure vulnerable groups have access to essential services.

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

Mobile services have become an essential part of life. However, there are limitations and challenges associated with mobile services in RRR areas. Many RGA members have invested in expensive repeaters and antennas to improve their mobile connections. However, there are still areas with poor coverage and extended periods of interrupted service.

Mobile services are vital in keeping communities safe and connected during natural disasters and emergencies. Maintaining and improving mobile networks is incredibly important to ensure communities can communicate during emergencies.

Mobile services must be available to complement the technologies used to deliver a universal framework in future years.

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

Under the current universal service framework, the following items should be retained and changed.

Retention:

- **Geographic Coverage:** The requirement for universal service providers to ensure coverage across all geographic areas, including remote and underserved regions, should be retained to ensure equitable access.
- **Minimum Service Standards:** Minimum standards for service quality and availability, particularly for essential services like voice and broadband, should be retained to protect consumers.

Changes:

- **Focus on Broadband:** Given the increasing importance of broadband for communication, education, healthcare, and economic participation, there should be a greater emphasis on universal access to affordable broadband services.

- **Affordability:** While affordability is addressed to some extent in the current framework, there should be more explicit requirements to ensure that services are affordable for low-income communities.
- **Dynamic:** The framework should have a technology-agnostic approach to ensure that it remains effective in addressing the needs of the community in a rapidly changing digital landscape.

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

Payphones continue to play an essential role in communities, and all payphones should be included in a modern universal framework. Payphones can act as a lifeline for those experiencing domestic violence, homelessness and emergency situations.

The location and concentration of payphones should be periodically reviewed to ensure that they are accessible to the communities that need them most.

How should affordability be considered?

The existing Universal Service Obligation (USO) is crucial for ensuring that residents in RRR areas of Australia can access communication services that are both reliable and affordable. The USO has provided fair access to essential communications infrastructure in areas where commercial investment may not be viable.

The revised framework should uphold the USO's focus on geographical parity and affordability. A minimum standard for affordability is required to guarantee that residents in RRR communities have access to reasonably priced communications.

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 deliver better outcomes and meet the digital inclusion needs of First Nations Australians. Consultation with First Nations communities and groups during the framework's development will help ensure it is relevant and effective.