Isolated Children's Parents' Association of Australia Inc.

"Access to Education"



Submission

to the

Thematic Review

of the

Customer Service Guarantee (CSG)

from the

Federal Council of the Isolated Children's Parents' Association of Australia Inc. ICPA (Aust)

March 2023

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The Isolated Children's Parents' Association of Australia, ICPA (Aust), welcomes the opportunity to contribute to consultation on the *Thematic Review of the Customer Service Guarantee (CSG)* providing feedback related specifically to communications needs of rural and remote education and geographically isolated students.

ICPA (Aust) is a voluntary, apolitical, national parent organisation, which advocates on behalf of our members for equity of access to an appropriate education for all geographically isolated children and students, from early childhood through to tertiary. The majority of member families of the Association reside in geographically isolated areas of Australia and all share a common goal of achieving equitable access to education for their children and the provision of services required to achieve this. Students whose family home is in rural and remote Australia often live great distances from their nearest education institution and from services required to support their education.

Students whose family home is in rural and remote Australia and who are enrolled in Schools of Distance Education rely heavily on telecommunications to access daily lessons, via both telephone and internet. ICPA (Aust) continues to promote equitable access to educational opportunities for geographically isolated students across all components of its advocacy. Adequate communications in rural and remote areas of Australia underpins the ability for students to access their education programs and resources. The importance of ensuring high quality, reliable and affordable communications services is critical. For these students, communication is key.

The need for reliable and maintained telephony services remains a high priority for ICPA (Aust) members. Despite significant changes that have bearing on the future of the CSG, including altered industry structure and greater use of mobile and broadband voice networks and services, as recognised in the consultation paper, 8% of premises in rural and remote Australia are outside the NBN Co fixed line service and therefore continue to rely on Telstra legacy network services, including copper lines and high capacity radio concentrators (HCRC). Many ICPA (Aust) members are within this 8%. Further, some member's children also attend small rural schools that are currently dependent on Telstra legacy services for contact for teacher support, assistance, mentoring, emergencies and general administration tasks of a school.

As suggested in the fourth option within the consultation paper for the CSG, ICPA (Aust) believes that it is imperative that the status quo remains for those consumers who still rely on the Telstra legacy network when considering any alterations to the CSG. Even with the CSG and other measures in place, ICPA (Aust) members who rely on these services continue to report long periods of time with a substandard phone connection, as well as deficient fault reporting processes, repair times and installation times. ICPA (Aust) is also very concerned that there are situations where telecommunications providers are limiting maintenance and repairs of older, existing technologies despite limited to no alternatives to these technologies in many areas. It is imperative that ongoing inspection, scrutiny and enhancements are made to continuing technology to ensure it is working correctly and that existing, and perhaps stronger, CSG arrangements be retained for those who rely on Telstra legacy services.

While many of our members rely on Telstra legacy services, there are members who also utilise other communications technology and it is crucial that where educational delivery hinges on the availability of this technology, that priority is given to the installation and maintenance of these services. The unreliability at times of voice services and internet technologies in rural and remote locations, (e.g., the impacts of inclement weather on satellite services) can cause significant issues for rural and remote families. ICPA (Aust) encourages additional or expanded CSG framework protections for consumers, particularly in relation to protecting consumers with broadband services and users of fixed

voice services. This would ensure that all consumers are protected regardless of the service they utilise and even if their communications usage changes over time.

ICPA (Aust) appreciates the opportunity to provide input into this consultation. There are ongoing concerns in the area of communications in rural and remote areas. ICPA (Aust) therefore supports retaining and upholding the current CSG framework, along with extending its protections across more services to ensure all consumers are protected.