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2023 CSG Thematic Review
Universal Services Branch
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
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To whom it may concern

As Minister for Science and Technology, I am responsible for delivering government policy outlined in the Tasmanian Government's digital transformation strategy, 'Our Digital Future'. We are developing stronger foundations to support 'anytime, anywhere' services and information for Tasmanians and see reliable digital connectivity as critical to Tasmania's future. On behalf of the Tasmanian Government, I would like to submit this letter to the Thematic Review of the Customer Service Guarantee (CSG).

The CSG in its current form has limited relevance due to the NBN rollout and increased use of mobile services. The focus of future service regulation should be on wholesale services and backhaul supply. The consultation paper invites a response to the question: '*Are different approaches potentially required for the NBN and similar networks as opposed to the fixed line voice network still operated by Telstra outside NBN Co's fixed line footprint?*' For Tasmania, the answer to this question is, yes. Many issues of concern to Tasmanian consumers will likely be determined by the operation of the underlying wholesale networks and backhaul supply. Those networks face limited, if any, competition, particularly in the fixed-line market.

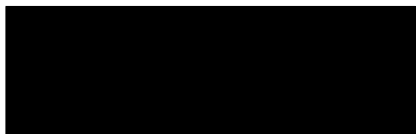
Tasmania has a unique market context whereby wholesalers such as NBN Co are dependent on a third-party backhaul supplier (Telstra), and both parties have advised they have no immediate plans for future network investment in this respect. At present, ageing backhaul infrastructure is putting the reliability of that connectivity at risk. There is an urgent need to upgrade the State's backhaul infrastructure to ensure long-term reliability, performance and consumer competitiveness.

I would encourage the review to consider an approach to future service regulation which emphasises the importance of delivery requirements at the wholesale level for NBN Co and other infrastructure providers. These requirements would apply nationally and include backhaul services. Regulation should address the diversification of cable infrastructure to reduce the impact of failures and outages; along with performance standards relating to connection, fault repair, and the keeping of appointments.

Tasmania's future is dependent on digital connectivity. Underlying wholesale networks and backhaul supply is a critical issue and regulation should protect regional areas and promote reliable connectivity.

I appreciate your consideration.

Yours sincerely



Hon Madeleine Ogilvie MP

Minister for Science and Technology