

A roadmap for First Nations digital inclusion

Northern Territory Government submission
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1. Executive Summary

Australians are increasingly dependent on telecommunications services and reliable connectivity. With essential services progressively moving online, the lack of digital inclusion can be a barrier to full participation, impacting employment, education, health, business opportunities - and further exacerbating disadvantage.

Too many First Nations people are being left behind in the digital world without sufficient affordable access and skills to achieve digital inclusion - remote Territorians are amongst the most digitally disadvantaged.

To support full participation in the digital world and to establish an effective roadmap, the measure of access to connectivity needs to include consideration of sufficient bandwidth, adequate devices, increased reliability without extended outages or congestion and services that meet the needs of First Nations communities.

Modern technologies have the potential to enable connectivity to all Australians. However, the lack of appropriate business models to support suitable and affordable access still represents a substantial barrier to digital inclusion.

First Nations people have unique consumer preferences that are influenced by cultural, geographical and socioeconomic factors. Mobility is an important principle in remote Aboriginal communities where overcrowding of households can limit the effective use of standard broadband services. Mobile phones are still the product of choice in remote communities. Where connectivity is present, mobile phone uptake is rapid and sustained.

Current incentives, funding and co-investment programs have not elicited a market response that will meet the needs and preferences of First Nations consumers, and there remain areas that will never be connected by relying exclusively on current market forces.

Where there is market failure with few/single provider markets, or significantly disadvantaged marketplaces, there is a role for the Australian Government to more firmly regulate and provide incentives and/or funding to ensure a baseline and appropriate level of service is provided.

To address digital inclusion, funding must be allocated based on need, rather than the size, population or co-investment capacity of the jurisdictions. Priority for government support should be applied to regional and remote areas, particularly with high proportions of First Nations people. Where infrastructure and service gaps exist, these communities should be prioritised for investment and support to ensure an equal baseline of digital inclusion across communities.

In order to develop informed and empowered consumers, the Australian Government should use its regulatory levers to ensure telecommunications providers are required to deliver clear, consistent, accurate, comparable and understandable information about their services. This will provide support for informed decisions on availability and suitability of connectivity services and ultimately help achieve desired digital inclusion outcomes.

The NT Government welcomes the opportunity to provide input on the *First Nations Digital Inclusion Advisory Group* development of a roadmap to support the development of a national plan for achieving digital inclusion outcomes.

2. Introduction

On 1 May 2024, the First Nations Digital Inclusion Advisory Group (FNDIAG) announced it is seeking feedback on how government and industry can better support First Nations people with access to internet and media to make decisions about their lives and communities. This initiative aims will develop a roadmap to achieve First Nations digital inclusion and Closing the Gap Target 17.

The Northern Territory (NT) Government has developed an implementation plan that contributes to achieving Closing the Gap targets. Target 17 specifies equal levels of digital inclusion for First Nations people, which has been a focus for NT for many years through co-investment initiatives to improve access to telecommunications services in remote communities, provision of free community Wi-Fi and building skills within communities through NT Libraries programs.

The NT Government welcomes the opportunity to provide input on the *First Nations Digital Inclusion Advisory Group* development of a roadmap to support the development of a national plan for achieving digital inclusion outcomes.

This is the third submission made by the NT Government to various Australian Government reviews and inquiries relating to telecommunications issues in 2024, following the *Better delivery of universal baseline telecommunications services* and the *Funding of universal telecommunications services (Regional Broadband Services)* review. A fourth, the *Regional Telecommunications Independent Review Committee (2024) Review*, is also being conducted concurrently to this submission.

There is substantial overlap in the issues, discussion points and recommendations reported in our submissions. Given the scope of the Advisory Group, the NT Government has focused this submission on areas with potential to provide the most benefit for First Nations people in the NT, who demonstrably suffer the most discrimination with the digital divide.

The NT Government strongly encourages the Australian Government to consider this, and other submissions provided recently. These are particularly relevant to telecommunications policies that close the gap on First Nations digital disadvantage in Australia and benefit all Australians.

3. Northern Territory context

The NT has an area of more than 1.3 million square kilometres yet is occupied by just over 232,000 residents¹. The Australian Statistical Geography Standard (ASGS) Remoteness Structure classifies most areas outside of Darwin in the NT as “Remote” or “Very Remote.”

The digital divide between metropolitan, regional and remote areas for First Nations people is clearly demonstrated in the 2023 Australian Digital Inclusion Index (ADII)². In metropolitan and regional areas, First Nations people have adequate access at the same level as other residents with an index score of 70 (out of 100) in both categories, compared with a national average of non-First Nations people of 72.

However, for First Nations people living in remote areas, the average access score is 34. This shows that the ability to get online in these regions is less than half of metropolitan and regional areas. The Mapping the Digital Gap (MtDG) research project highlights that this problem is further exacerbated in the NT, in which all four remote communities in the study scored less than 30. This digital divide results in significant challenges related to accessing government, health and education services and economic development opportunities.

¹ Australian Bureau of Statistics (ABS) 2021 Census

² The Australian Digital Inclusion Index dimensions <https://www.digitalinclusionindex.org.au/the-adii/>

In the NT, there are more than 70 remote communities and over 500 recognised homelands comprised of approximately 50,000 residents. Many homelands consist of only one or two families and are not permanently occupied but remain as homelands where people may periodically reside.

The low population density and high cost of extending networks into remote areas mean that many NT residents have a disproportionate reliance on legacy, ageing telecommunications services, which are mainly owned and operated by a single provider.

4. New business models

Modern technologies have the potential to enable connectivity to all Australians, regardless of where they live. However, the lack of appropriate business models to support suitable and affordable access still represents a substantial barrier to digital inclusion.

Until it is recognised that existing models used by industry and approved of by regulators do not reflect real world requirements in disadvantaged environments, there will be no meaningful progress towards closing of the gap or reducing the digital divide.

First Nations people have unique consumer preferences that are influenced by cultural, geographical and socioeconomic factors. The NT Government advocates for services in remote communities to be wireless, pre-paid/pay-per-use, data and voice capable, transportable, affordable, reliable and resilient.³

Mobility is an important principle in remote Aboriginal communities where overcrowding of households can limit the effective use of standard broadband services. Account-based broadband services usually have low uptake due to the financial commitment required, along with inability to control usage and manage costs in a household. Consequently, mobile phones are still the product of choice in remote communities across the NT. In locations where connectivity is present, mobile phone uptake is rapid and sustained.

In the submission to the review on *Better delivery of baseline universal telecommunications services*, the NT Government has called for the introduction of a modern universal service framework to provide data (and voice) connectivity to all Australians and the importance of connecting via portable mobile devices.⁴

To provide an effective safety net, it is essential that a modern universal services framework delivers telecommunications services that are up-to-date, reliable, robust and able to meet the needs and expectations of consumers, particularly those in regional and remote areas. This will provide the foundation for access to services for all Australians and underpins efforts to achieve digital inclusion.

Recommendation for Inclusion 1: Modernise the Universal Service Obligation to provide data services to mobile devices, moving away from focusing on connecting premises.

Post-paid plans tie consumers into expensive long-term commitments, generally beyond the means of vulnerable, financially-stressed households. Despite pre-paid data costs being much higher per gigabyte than post-paid rates, many remote First Nations residents often choose pre-paid mobile phone services. This option allows people to pay what they can afford when they can afford it.

The Australian Government should reflect the preference for pre-paid services when framing regulations for the protection of customers and establishing frameworks for the efficient and equitable delivery of telecommunications services.

³ Better delivery of baseline universal telecommunications services, NT Government submission, February 2024, p.10 <https://www.infrastructure.gov.au/sites/default/files/documents/bdus2024-nt-government.pdf>

⁴ Better delivery of baseline universal telecommunications services, NT Government submission, February 2024, p.10 <https://www.infrastructure.gov.au/sites/default/files/documents/bdus2024-nt-government.pdf>

Recommendation for Inclusion 2: Prioritise funding and development of new services for First Nations communities and consumers that are culturally appropriate and focus on providing access via mobile devices, pre-paid services and consideration of filtering, unmetered access to cultural content and other measures to meet community needs.

Remote Australians are victims of a commercially failed market, as telecommunications providers have little to no appetite to extend services to these areas due to high costs and low return on investment. Additionally, these organisations have largely failed to respond to the requirements and preferences of First Nations consumers.

While co-investment programs between industry and governments have increased connectivity in remote regions and First Nations communities, there remain many smaller communities and isolated residents across the NT without any form of telecommunications services. Conventional co-investment programs in the NT have all but exhausted what is financially viable using traditional methods within the competitive market environment.

Where there is market failure with few/single provider markets, or significantly disadvantaged marketplaces (such as remote First Nations communities), there is a role for the Australian Government to more firmly regulate and provide incentives and/or funding to ensure a baseline and appropriate level of service is provided.

Current incentives, funding and co-investment programs have not elicited a market response that will meet the needs and preferences of First Nations consumers, and there remain areas that will never be connected by relying exclusively on current market forces. There are more than 5,500 Territorians living in remote communities and homelands with inadequate data services, or none at all, including more than 1,000 remote Aboriginal residents across 133 homelands with populations of less than 20.

Recommendation for Inclusion 3: Declare market failure in underserved areas, to enable the development of innovative service models and government partnerships without breaching regulatory principles.

With the recent advancements of alternative technologies, such as Low Earth Orbit (LEO) satellites, technology is no longer the barrier to providing affordable, accessible and practical modern connectivity to very remote and sparsely populated locations. These new services are proving far more capable of delivering modern communications services with much higher capacity and speeds than fixed line copper or geostationary satellites. The ability for these technologies to deliver reliable voice and data services create new opportunities and should be considered when developing new models for remote First Nations connectivity.

The NT Government supports the adoption of a technology-agnostic approach to connectivity in remote First Nations communities. This includes the use of diverse and innovative technologies including satellite, radio, mobile and fixed-line services to deliver the most suitable and sustainable options for communities. Having such flexibility can enhance the resilience of telecommunications networks and promotes greater inclusivity, equity and opportunity for remote communities.

Place-based telecommunications strategies for First Nations communities are essential for addressing the unique needs and challenges of different communities. The current approach does not meet the needs of remote First Nations people, with business models that often act as a barrier to connectivity and are driven by service providers at the expense of adequate digital access.

To address digital inclusion, funding must be allocated based on need, rather than the size, population or co-investment capacity of the jurisdictions. Priority for government support should be applied to regional and remote areas, particularly with high proportions of First Nations people. This will drive industry attention, aggregate buying power and help entice industry to provide new and innovative solutions for priority locations.

Where infrastructure and service gaps exist, these communities should be prioritised for investment and support to ensure an equal baseline of digital inclusion across communities. By setting clear standards for access, policymakers can identify gaps and direct investment into services that will have the most significant impact on digital inclusion.

The NT Government calls for greater integration of national policies and programs with local initiatives to improve digital inclusion at a national level. Australian Government programs should be flexible, adaptable and allow for a level of local authority and agency in co-designing services, which are fit for purpose and consider local and cultural contexts.

Recommendation for Inclusion 4: Allocate specific funding for the delivery of technology-agnostic connectivity solutions in First Nations communities. Funding should be allocated based on needs and disadvantage to ensure solutions for Australia's most remote and vulnerable communities.

5. Access

Access to modern connectivity is the foundation of digital inclusion, and a disproportionate number of First Nations Territorians remain without practical access to reliable telecommunications services.

For approximately 130 NT remote Aboriginal communities, a Telstra payphone provided under the Universal Service Obligation is the only source of telecommunications access. A further 160 communities are reliant on either a community phone or a Wi-Fi phone delivered through the National Indigenous Australians Agency (NIAA) Remote Indigenous Communities Telecommunications activity⁵ as their only telecommunications service. These communities represent more than 4,000 Territorians (circa 1.6 percent of the total population).

Technology is also an important enabler for people with disability with the availability of assistive technology to support their needs, for example voice assistants that allow users to control appliances. People with disability in remote areas are further disadvantaged by lack of connectivity.

Recommendation for Inclusion 5: Establish a model to provide First Nations people with disability and other vulnerable consumers in remote areas with reliable connectivity to support the use of assistive technologies.

Australians are increasingly dependent on telecommunications services and reliable connectivity. Recent national service outages have highlighted impacts across every aspect of life. Place-based planning and solutions can also support resilience in remote regions with limited infrastructure.

The impact of losing telecommunications in remote communities is more critical than for regional and urban areas. When a remote community loses connectivity, residents are often unable to buy food or petrol or power because these rely on connectivity or electronic transactions via EFTPOS that only work with appropriate connection to delegated financial authority.

When an outage occurs in remote communities, the time to repair can be extensive. This is unacceptable in urban areas and should not be tolerated in remote areas either. Plans, equipment and resources should be in place to respond and enable prompt service restoration. These issues must also be considered when planning for the delivery of services across remote Australia and building digital capacity in First Nations communities.

In 2023, at least 34 NT communities were left in isolation with no access to telecommunications services for a total of 185 days. The longest of these was an outage in the community of Yarralin that lasted 27

⁵ The Remote Indigenous Communities Telecommunications program maintains a network of community payphones, Wi-Fi satellite phones and Wi-Fi hubs across First Nations communities in the NT, Queensland, South Australia and Western Australian. This is outside services provided by the USO

days, and three other communities experienced isolation outages that persisted for more than a week. Telecommunications reliability is critical for all Australians, even more so for those living remotely.

Redundancy can be improved by utilising independent technologies, such as community Wi-Fi, mobile phone, fixed line and other services. Community Wi-Fi and similar solutions should be considered as an option to provide network redundancy in remote regions where communications outages are common and impact basic living requirements.

Community Wi-Fi solutions provide a method of delivering affordable access to digital connectivity in First Nations communities. Any broadscale delivery of these projects should be underpinned by a national policy that ensures the sustainability of these services and provides equitable access between communities and prioritises delivery to communities with greatest need.

Recommendation for Inclusion 6: *Prioritise the installation of funded community Wi-Fi solutions or similar, to provide a redundant network in remote First Nations communities where communications outages impact basic living requirements.*

6. Affordability

The affordability gap in the 2023 ADII appears relatively low at 6.1, however this is skewed by the large size of households, which boosts affordability scores despite low personal incomes. Over 90 percent of remote mobile users are on pre-paid services, largely due to unreliable income, large households sharing devices and prior experience with excess bills. Issues with affordability are further exacerbated in remote locations due to lack of competition and choice of services and devices.

A reluctance to engage with providers due to negative experiences or lack of English language skills may also be a contributing factor. The telecommunications industry has a history of overselling services and devices to vulnerable people without information about their options or rights, resulting in punishment by the industry regulator⁶.

While mobile plans have now changed to month-to-month contracts and excess data charges replaced by shaped plans, there is limited information on available plan options. First Nations people are also spending a much higher proportion of household income on digital connectivity or are simply not able to afford it at all.

There is an opportunity to consider options to appropriately subsidise access to connectivity, either through the effective provision of a safety net through the Universal Service Obligation, the broadscale provision of community Wi-Fi services or through other mechanisms such as the Commonwealth Telephone Allowance (CTA).

The CTA is a financial benefit provided by the Australian Government to help eligible people with the costs associated with maintaining a telephone service. It could be used as a mechanism to support connectivity in remote communities by considering remoteness in the CTA eligibility criteria. Internet and mobile services could also be included in the CTA to recognise the lack of competition and preference for accessing services via mobile devices.

Recommendation for Inclusion 7: *Adjust the Commonwealth Telephone Allowance to include internet and mobile services to increase the affordability of connectivity in remote First Nations communities and among other disadvantaged Australians.*

⁶ [Telstra's 'pink bus' service accused of not fully informing Indigenous customers of their rights](#), ABC online 24 November 2023

7. Supporting digital ability

The 2023 ADII shows a large digital gap between the necessary skills of non-First Nations people in remote communities (71.5) and First Nations people (46.1).

With most essential services increasingly moving online, the lack of digital literacy can impact employment, education, health, business outcomes and further exacerbate disadvantage. Digital skills including emails, software applications, website navigation and online meetings are often critical for participation in daily life. Digital literacy enables digital skills to be integrated with culture to support cultural preservation, community empowerment, representation and data sovereignty.

Many of the existing systems required to interact with the online world are not appropriate for remote First Nations people. The user interfaces for many online forms and resources are often complex, text heavy and poorly designed for use on mobile devices, preferred by First Nations communities. This can further prevent residents from accessing essential services. Additionally, businesses often outsource their support services offshore, making it even more difficult for remote residents who do not speak English as a first language. Digital Mentors can provide assistance in language and guide community members through the processes required to access online services.

Recommendation for Inclusion 8: *Ensure appropriate consumer support and protections for First Nations communities, including the requirement to make available local support or on-shore, English proficient call-centres trained to engage with major First Nations languages.*

To foster digital skills development, it is important to invest in the design of appropriate resources and training programs and build capacity in the local communities where services are being delivered. Considering the local context increases digital confidence as new technology is introduced and creates opportunities to develop into digital employment pathways.

inDigiMOB⁷ is an example of a highly effective digital inclusion program, which is funded by Telstra and delivered by First Nations Media Australia, the national peak body for the Aboriginal and Torres Strait Islander media industry, in collaboration with local organisations.⁸ This and other programs should be expanded and properly resourced in order to reach more remote First Nations people who are struggling to obtain and maintain skills for the online environment.

Building local digital capacity can also address ongoing maintenance requirements of digital services in remote regions. For example, it can mitigate local outages that otherwise would last for extended periods of time.

In general, greater digital inclusion should result in greater workforce participation by First Nations people (mainly young people) who are confident with the generation of, and interaction with, digital content and information.

The Australian Government's announcement of a First Nations Digital Support Hub should enable the development and distribution of information for First Nations communities to connect them digitally, understand their options, stay safe online and build digital skills and confidence. This resource should be used to provide meaningful support to the Digital Mentors network (also recently announced by the Australian Government) and other place-based resources to help local communities access services and develop skills.

⁷ [inDigiMOB](#) is about improving digital inclusion for Aboriginal and Torres Strait Islander people in remote NT communities. It does this by forming partnerships with communities and local organisations and making available a suite resources that communities can take advantage of according to their needs.

⁸ *First Nations Digital Inclusion Advisory Group initial report*, 2023, p.19 [first-nations-digital-inclusion-advisory-group-initial-report.pdf \(digitalinclusion.gov.au\)](#)

Recommendation for Inclusion 9: *Ensure the First Nations Digital Hub and Digital Mentors provide outreach directly to First Nations consumers and communities with information and assistance that considers language, cultural context, digital literacy levels and community aspirations. These services should also support place-based planning for appropriate projects to meet local needs and foster further digital*

Digital connectivity literacy has been highlighted as an issue across First Nations consumers and regional and remote communities more broadly. In order to develop informed and empowered consumers, the Australian Government should use its regulatory levers to ensure telecommunications providers are required to deliver clear, consistent, accurate, comparable and understandable information about their services.

The Australian Competition and Consumer Commission (ACCC) is already working with service providers to improve the comparability of mobile coverage with consistent terminology. In addition, the Australian Government should mandate transparency and accountability from service providers so that consumers can make informed decisions. This could include requirements for providers to report on bandwidth, capacity, congestion, outages and conditions so that consumers understand their options and can make the best decision suitable for their individual circumstances.

Information should be readily available to all consumers and presented in a way that can be also used and understood by First Nations people. This will provide support for informed decisions on availability and suitability of connectivity services and ultimately help achieve desired digital inclusion outcomes.

Recommendation for Inclusion 10: *Establish a regulatory requirement for telecommunications providers to deliver regular accessible, meaningful, transparent and comparable information on service quality, enabling consumers to make informed decisions on connectivity, coverage, performance, reliability and cost.*

8. Data

The NT Government considers the use of evidence based data, such as the *ADII 2023* and the *Mapping the Digital Gap* project, critical for improving digital inclusion.

Measuring access to connectivity must go beyond assessing whether individuals have internet access, to instead evaluating the quality and usability of the connection in the context of participation in the digital world.

To support full participation in the digital world and to establish an effective roadmap and measure progress towards digital inclusion, access to connectivity needs to include: sufficient bandwidth; adequate devices; increased reliability without extended outages or crippling congestion; and services that meet the needs of First Nations communities.

Recommendation for Inclusion 11: *Update access and affordability measures to better reflect the experience of First Nations consumers. They should include access to connectivity that supports full participation in the digital world and affordability as the relative cost for an individual accessing modern connectivity.*

9. Media and broadcasting

The media and broadcasting sector plays a vital role in providing communities with important information and contributes to preserving culture and language through storytelling and content creation. First Nations media organisations provide information, news, education and entertainment, which directly supports Outcome 17 in Closing the Gap. They also provide local employment opportunities through content

creation, local journalism media production and technical positions for maintenance and IT support.⁹ Government and industry should be encouraged to engage more with First Nations media organisations to ensure information and services are culturally appropriate and available in First Nations languages.

The Viewer Access Satellite Television (VAST) direct-to-home satellite TV service was installed at each premises in remote communities by the Australian Government from 2013, replacing local analogue broadcasting. Ongoing maintenance was deemed a householder responsibility. There has been no formal maintenance program for the VAST television services since they were installed. MtDG surveys of NT communities showed the VAST usage in communities to be as low as 20%, due to disrepair of the equipment in households. These were mainly a reflection of the prohibitive cost of replacing set top boxes, lack of technical support and no repair/maintenance regime.

The lack of VAST TV services has led to some households signing up for subscription satellite services, however the high monthly bills are difficult to sustain on low and unreliable incomes. Some residents are also using their mobile phones to access TV channels, which puts unnecessary stress on the communities' mobile networks (where available). A return to TV broadcasting would reduce demand on the mobile network and reduce household expenditure on online entertainment via pre-paid mobile services.

In its initial report, FNDIAG recommended the Australian Government to fund a pilot for rebroadcasting technology in remote communities that participate in the Remote Indigenous Broadcasting Scheme (RIBS), specifically in Galiwin'ku and Wadeye.¹⁰

There are also other providers in remote areas that are able to utilise existing but unused equipment and antennas in community that were intended for television broadcasting prior to VAST. The Broadcasting for Remote Aboriginal Communities Scheme (BRACS) infrastructure is still in workable use. Re-establishing broadcasting television services where there is still legacy broadcasting equipment can restore a way for remote First Nations Australians to access free-to-air channels and free up valuable mobile phone coverage that this is being consumed to access TV.

Recommendation for Inclusion 12: Re-establish broadcasting television in remote communities using legacy broadcasting equipment.

⁹ Discussion Paper – First Nations digital inclusion roadmap, p.9 [roadmap-discussion-paper.pdf \(infrastructure.gov.au\)](#)

¹⁰ First Nations Digital Inclusion Advisory Group initial report, 2023, p.27 [first-nations-digital-inclusion-advisory-group-initial-report.pdf \(digitalinclusion.gov.au\)](#)

10. Recommendations For Inclusion

1. Modernise the Universal Service Obligation to provide data services to mobile devices, moving away from focusing on connecting premises.
2. Prioritise funding and development of new services for First Nations communities and consumers that are culturally appropriate and focus on providing access via mobile devices, pre-paid services and consideration of filtering, unmetered access to cultural content and other measures to meet community needs.
3. Declare market failure in underserved areas, to enable the development of innovative service models and government partnerships without breaching regulatory principles.
4. Allocate specific funding for the delivery of technology-agnostic connectivity solutions in First Nations communities. Funding should be allocated based on needs and disadvantage to ensure solutions for Australia's most remote and vulnerable communities.
5. Establish a model to provide First Nations people with a disability and other vulnerable consumers in remote areas with reliable connectivity to support the use of assistive technologies.
6. Prioritise the installation of funded community Wi-Fi solutions or similar, to provide a redundant network in remote First Nations communities where communications outages impact basic living requirements.
7. Adjust the Commonwealth Telephone Allowance to include internet and mobile services to increase the affordability of connectivity in remote First Nations communities and other disadvantaged Australians.
8. Ensure appropriate consumer support and protections for First Nations communities, including the requirement to make available local support or on-shore, English proficient call-centres trained to engage with First Nations people.
9. Ensure the First Nations Digital Hub and Digital Mentors provide outreach directly to First Nations consumers and communities with information and assistance that considers language, cultural context, digital literacy levels and community aspirations. These services should also support place-based planning for appropriate projects to meet local needs and foster further digital opportunities.
10. Establish a regulatory requirement that telecommunications carriers must provide regular, meaningful, transparent and comparable data relating to services to support consumers to make informed decisions relating to connectivity, including coverage, performance, outcome and outages.
11. Update access and affordability measures to better reflect the experience of First Nations consumers. They should include access to connectivity that supports full participation in the digital world and affordability as the relative cost for an individual accessing modern connectivity.
12. Re-establish broadcasting television in remote communities using legacy broadcasting equipment.

11. Department Contact

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