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2024 Regional Telecommunications Review Secretariat
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
CANBERRA ACT 2601



By email: secretariat@rtirc.gov.au

Friday, 28 June 2024

Re: Submission to 2024 Regional Telecommunications Review

Dear Sir/Madam,

Thank you for the opportunity to provide feedback in relation to the 2024 Regional Telecommunications Review. It is acknowledged that a Regional Telecommunications Independent Review Committee (the Committee) is established every three years under Part 9B of the *Telecommunications (Consumer Protection and Service Standards) Act 1999* to conduct a review into telecommunications services in regional, rural, and remote parts of Australia.

It is understood that the following terms of reference (ToRs) are applicable to the current review process:

- a. awareness and the impact of the Government's \$1.1 billion investment in improving regional communications, including the \$656 million Better Connectivity Plan for Regional and Rural Australia; extent to which this investment is addressing identified needs; and flexibility to address emerging needs and challenges.
- b. the implications of, and opportunities presented by, changing and emerging technologies and broader market developments for regional communications policy settings and the design and delivery of regional communications programs.
- c. attitudes of regional households, communities, and businesses to; community awareness of; access to supporting technologies to support take-up of; and public sentiment on changing and emerging technologies.
- d. needs in First Nations communities, and the extent to which those needs are being met, taking into account initiatives across the Government.
- e. potential to fast track some USO modernisation outcomes, particularly within NBN Co's fixed wireless network footprint, which would build momentum for broader change; and
- f. the suitability of regional communications during emergencies and natural disasters, including reliability, resilience, speed, and coverage.



Narrabri Shire Council

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The following information is therefore submitted for RTIRCs consideration:

Local Context

Narrabri Shire is a [local government area](#) in the [North West Slopes](#) region of NSW. The primary settlement of Narrabri is located adjacent to the [Namoi River](#) and at the confluence of the [Newell](#) and [Kamilaroi Highways](#).

The local government area (LGA) is strategically positioned halfway between Sydney and Brisbane and is considered to be resource rich. Key local industries include mining and agriculture. At the last census (2021) the resident population was 12,721 persons.

Narrabri Shire Council's vision is articulated in the Community Strategic Plan as follows:

"Narrabri Shire will be a strong and vibrant regional growth centre providing a quality living environment for the entire Shire community."

The township of Narrabri is considered to be one of the most flood prone settlements in NSW. The community of Wee Waa, located west of Narrabri, is periodically completely isolated by flood waters for long periods (up to two weeks) and is protected by a ring levee. Narrabri Shire contains a number of vulnerable and at-risk communities that are flood-affected. These communities have a high Aboriginal population, low socio-economic base and are also ageing in nature.

Council has an extensive rural road network of 2,344 kilometres in length with a total area of 13,031km². Like many rural and regional Councils in NSW, it provides a broad range of services, including but not limited to, drinking water provision, sewerage treatment plants, waste management, community services and recreational facilities within multiple settlements across the local government area.

Narrabri Shire is strategically located with reasonably efficient and highly important access to key domestic markets and international gateways. Future necessary investments will further strengthen this. Narrabri Shire is located directly along or in close proximity to key inland transport routes connecting to Brisbane, Melbourne, Newcastle and Sydney. This gives the Shire an advantage in attracting and retaining businesses that rely on efficient access to domestic and international markets via road and rail. The Shire's geographic advantages will be harnessed by planned investments, including Inland Rail, the former NSW Special Activation Precinct area and N2IP (Inland Port), which will enhance and leverage connectivity to Brisbane, Sydney, Newcastle, and Melbourne to support new and existing industries.

These investments will provide opportunities for local industries across Narrabri Shire's townships, supporting greater market access for producers and businesses. For Narrabri Shire to harness its competitive geographic advantage and connectivity for the benefit of the community and industry, ongoing infrastructure investment will be a key priority. This includes accessibility to reliable, affordable mobile and internet connections for residents across Narrabri Shire.

Naturally endowed with fertile agricultural land, resources, and a diverse environment, the dynamic agricultural, mining and tourism sectors underpin our economic diversity and resilience. The Shire also boasts a range of other industries that include world-class research institutes, manufacturing, and processing facilities, as well as retail services that support a prosperous regional economy.

In 2023, Narrabri Economic Output was \$5.6B, and Gross Regional Product (GRP) totalling \$3.5B. Due to its location on the Great Artesian Basin, the Shire has access to vast natural resources, including extensive irrigation, coal, and gas reserves. Access to these resources has underpinned the Shire's economy, particularly through the agriculture and mining industries. Narrabri Shire is supported by a workforce of 6,949 as indicated in the 2021 Census.

The [NSW Digital Connectivity Index \(Connectivity Index\)](#) is a NSW state-wide measure designed to assess digital connectivity experience, providing reliable and consistent data to government agencies, businesses and communities.

The Narrabri Local Government Area (LGA) Stationary index result is 33. For on the move, the result is 24.

The village of Pilliga scores 15, Maules Creek is represented by a score of 0.

The scores indicate Narrabri Shire as Below Average (in range of 21 – 40). It is stated through index, that communities with these scores are unlikely to be able to meaningfully conduct digital activities such as working, video conferencing and accessing telehealth.

Communities with an index score of 0 to 20, are highly unlikely to be able to meaningfully conduct digital activities such as working from home, video conferencing, gaming, and online streaming.

1. Awareness and impact of government investment in regional communications – item (a)

As increases in technology advance at a rapid rate, it is essential that long-standing telecommunications issues are addressed in Region and Rural Australia. The following general observations are provided:

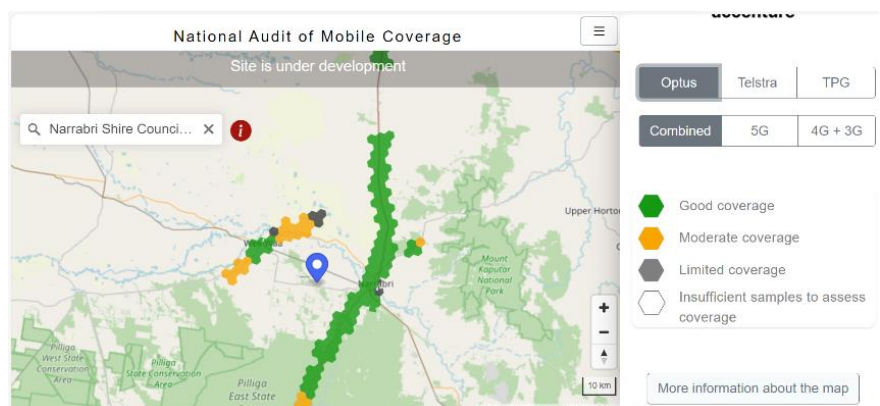
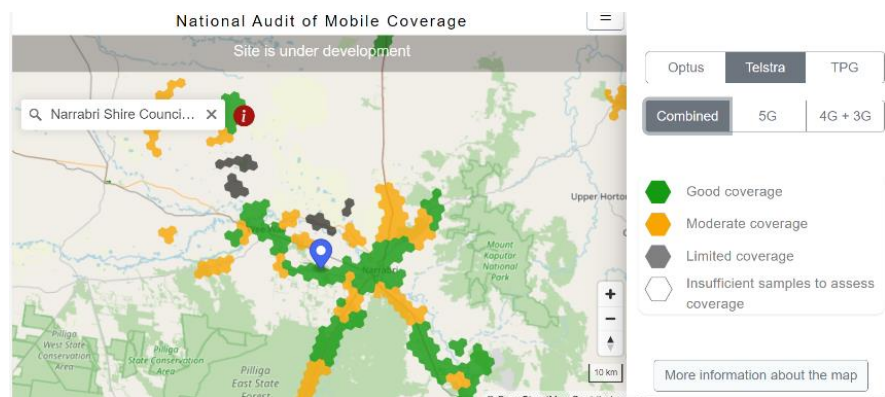
Narrabri Shire Council understands the following:

The Australian Government Better Connectivity Plan is a key initiative and part of the Australian Government's telecommunications agenda and is providing more than \$1.1 billion to rural and regional communities. This commitment forms part of the Government's investment of more than \$2.2 billion in regional communications.

- The Federal 'Mobile Network Hardening Program' provides a positive impact, improving resilience of infrastructure and sites to network disruption from unexpected events and therefore should be continued. In May 2024, Telstra was successful in receiving funding in Mobile Network Hardening Program Round 2 (MNHP2) for one project in the Narrabri LGA, to enhance resilience at Gwabegar Exchange, in the event of unplanned events. This program of work will see uplift power resiliency, increasing battery reserves to 12 hours at Telstra transmission feeder sites, which will bolster operational capability. Optus were also successful in

receiving funding under MNHP2, for a permanent generator located at Narrabri West Exchange.

- The Regional Connectivity Program and the Regional Tech Hub has had no measurable impact or local relevance in respect of the Narrabri Shire Local Government Area (LGA). There is also limited awareness or understanding of these Programs at a local level. There have been no projects funded in the Narrabri LGA, through Round 3, 2 or 1 through the Regional Connectivity Program. Furthermore, In January 2023, Narrabri Shire Council provided a letter of support to Field Solutions Group for an application to Round 3 of the Regional Connectivity program.
- The Federal 'Mobile Black Spot' program has had an overall generally positive impact and therefore needs to be continued indefinitely. It is noted that the program has received no budget allocation in the recent 2024-2025 Australian Government Budget. Projects within Narrabri LGA were successful in receiving funding under Rounds 1, 2 and NSW Round of the Mobile Black Spot Program. Narrabri LGA did not receive any funding from recent Round 7 of Mobile Black Spot Program. Disturbingly, Narrabri LGA was not identified as a target location of the Mobile Black Spot Program - Improving Mobile Coverage Round, therefore ineligible to receiving any funding through this program.
- Council notes through '*Independent audit of mobile coverage*', delivered through the *Better Connectivity Plan*, that several locations on Telstra network have limited coverage. Optus coverage is limited, highlighting further gravitas on mobile black spot program.



- Council understands The Australian Government's on Farm Connectivity Program is providing \$30 million over 2 years to enable primary producers in agriculture, forestry and/or fisheries to take advantage of connected machinery and sensor technology. Under the program, rebates are available to pre-approved suppliers that sell to and install eligible equipment for primary producers. Rebates of up to 50% of the cost of eligible equipment are available, with a minimum of \$3,000 and a maximum of \$30,000 rebates on offer.

Round 1 of the on-farm connectivity program closed 31 May 2024, or as funded was exhausted. The program provided producers with a rebate for equipment purchased. At the time of this submission, Council is unclear to the extent of impact of this program, as award applicants or locations have not been disclosed.

Council notes the successful NSW Government Farms of the Future (FotF) program, which provided \$20 million in funding producers in eligible LGAs to access grants from \$5000 to \$35,000 to implement to purchase the latest Agtech equipment and connectivity solutions to address their farm needs. To be eligible, applicant needed to complete the Farms of the Future Training Program "Monitoring your farm with Agtech", in-person, or online. The program had a lower co-contribution threshold, and successful attracted 43 grant recipients from Narrabri LGA.

Narrabri Shire Council recommends that future rounds of this program, or similar program providing Agtech implementation funding to primary producers, be:

- Targeted to areas facing the highest socio-economic impact from Murray Darling Basin Recovery Plan targets and subsequent environmental flow water buy backs, and NSW flood plain harvesting licensing framework, particularly producers in the Narrabri Shire.
 - Be communicated and promoted effectively at regional and rural community level, through Councils, Local land services and other local organisations.
- Local government needs to be provided with greater recognition in respect of its critical role as a key local stakeholder and change agent in both the development and delivery of telecommunications improvement and cognate support programs.
 - Digital literacy continues to be an ongoing challenge, particularly for older and CALD persons. Support measures in this space have been largely ineffective and future programs need to focus on leveraging existing local support networks.

2. Implications and opportunities presented by changing and emerging technologies – item (b)

- The significant advances in Artificial Intelligence (AI) and associated smart technologies since the 2021 Regional Telecommunication Review presents significant opportunities for regional and rural communities. Internet connectivity reliability, connection and access to affordable services remains a barrier for implementation of technologies, particularly in business and across local Agricultural industry.
- The movement of the community into working from home following COVID-19 pandemic has created unprecedented stress on an already inadequate infrastructure network. It should be noted that Narrabri is serviced by a single telecommunications

tower which experiencing reduced bandwidth availability, and decreased reliability evident on a daily basis. Consequently, further urgent investment is needed in such infrastructure to cater for the current sustained and future demand.

- Cybersecurity risks are on the rise as a result advances in AI technology and scam activity global including online data theft. Future investment in cybersecurity programs is, as a consequence is urgently needed.
- Remote work, online education and increased telehealth options has created unprecedented demand for products and services delivered by the tech industry. Technological support has struggled to keep up with increased customer needs on applications.

It is noted that the NSW Connectivity Index scored Narrabri LGA with scores of 33, The scores indicate Narrabri Shire as Below Average (in range of 21 – 40). It is stated through index, that communities with these scores are unlikely to be able to meaningfully conduct digital activities such as working, video conferencing and accessing telehealth.

Communities including Pilliga and Maules Creek with an index score of 0 to 20, are highly unlikely to be able to meaningfully conduct digital activities such as working from home, video conferencing, gaming, and online streaming.

- It is necessary for the Government to undertake the necessary actions to ensure that underpinning science, technological and innovation (STI) systems and frameworks become more inclusive to support diverse career paths. Systematic and collaborative approaches should also be employed to telecommunications policies to transition towards more sustainable, inclusive, and resilient futures.
- Working from home has allowed for more flexible work arrangements and increased diversity in STI, which has theoretically enabled the delivery and improvement of services such as telehealth and greater involvement of those with care responsibilities and located within rural/regional areas.
- It is also acknowledged that changes to patterns of working have reduced demand on office space. However, this, in turn, can have deleterious impacts on vibrancy of regional and rural centres and can create a range of economic challenges.
- The following emerging technologies and solutions have been identified as having relevance to the Narrabri Shire LGA:
- The emerging data centre concept in the 'Leading Edge' model is considered to be an exciting development and opportunity, particularly in the opportunities presented in the fostering of agricultural-allied technological solutions and commensurate innovations. The first data centre of its type is being constructed within the Tamworth Local Government Area (LGA), and the construction of a similar centre within the Narrabri LGA is supported.

3. Attitudes, awareness, access, and support of changing and emerging technologies– item (c)

- Narrabri Shire Council recently endorsed the Narrabri Shire Economic Development Strategy 2023- 2032, following extensive consultation. The strategy outlines the following strategic priority and actions around telecommunication improvements.

Strategy Outcome 2.3: Ensure fast, reliable digital connectivity for businesses, services, and residents.

A range of barriers continue to exist in regional communities affecting attitudes, awareness, access, and overall support for changing and emerging technologies. These barriers and respective challenges are summarised herewith:

- Lack of appropriate technical information and appropriate guidance and support with respect to installation, access and troubleshooting within the current telecommunications system.
- Ongoing cost disparities between regional/rural areas continues. In regional and rural areas, it remains very expensive to access telecommunications services. Financial subsidies need to be urgently considered to 'bridge the gap' to improve equity of access within rural and regional communities such as the Narrabri Shire. Furthermore, only one service provider (Telstra) currently exists within Narrabri, with no other active competitors in the mobile phone service space, leading to ongoing price gouging and poorer service standards due to the absence of competition in the marketplace.
- Recent community engagement in outlying rural villages including Pilliga and Gwabegar indicated a high appetite for digital literacy and computer skill training, to empower community member to engage digital services and emerging technologies, including telehealth and education.
- Narrabri Shire is a nationally significant agricultural producer. Given the ongoing limitations on data access and telecommunications coverage, our Producers are inhibited from accessing and implementing new technology, particularly within the Agribusiness sphere. These barriers ultimately result in a stymying of economic development and social growth opportunities. The availability of improved download speeds, reliability and reduction in cost would increase application and uptake exponentially.
- Digital equity and accessibility for rural residents and businesses remains a present challenge to accessing emerging technology, therefore effecting community attitudes towards technology, coupled with unreliable service.
- Improved network capability provides additional options and products for rural customers, increasing competition in market therefore improving overall service offering and affordability.
- The community has continued to express their frustration in navigating a very complex system of information over several service providers as part of their individual decision-making processes. Access to information also frequently relies on sporadic and unreliable internet access for supporting guidelines, collateral, and dissemination channels.

- The ageing population of our LGA makes access a challenge, generally. Older community members are often fearful of making incorrect choices with respect to telecommunications, which can in turn can lead to an inability or unwillingness to take up new technology, or adopting technology that might better suit their needs. There is often little support by way of training or education in respect of such services. This contributes to increased social isolation and community risk, generally.
- Reporting faults through the Telstra, remains difficult and convoluted. The complexity in the system in reporting faults and outages often results in customers 'giving up' part way through the process.
- The Telecommunications vernacular is littered with complex acronyms and techno-oriented language. Key concepts of 'fibre to the node', 'VPN', and 'ISDN', for example, are not well understood by the community, particularly older and CALD persons.
- Opportunities exist to improve access to information by telecommunications-challenged communities via a well thought out and clearly articulated local Communications Plan. Such a Plan could augment to the local Community Strategic Plan (CSP) and detail a range of actions required to support the affected community and local business. For example, communities with ageing populations could facilitate service provision through the existing Commonwealth Home Support Program (CHSP) with appropriately trained personnel to assist with setting up and basic training in the use of modern telecommunications devices. Businesses could also be provided with local support to navigate the various 'tiers of influence' with the view of providing independent guidance and advice. Region-specific Projects Officers co-funded by Telcos and State and Federal Government could also be considered in areas of greatest need.
- There are a range of service providers that can potentially provide training and upskilling solutions if provided with appropriate collateral and support material. These include, but are not limited to:
 - TAFE NSW
 - Local Chambers of Commerce
 - Community Colleges
 - Local libraries
 - Visitor Information Centres
 - Existing service organisations (e.g. Lions, Rotary Clubs and CWA)

4. *Universal Service Obligation reform – item (e)*

Council encourages the Australian Government to support reforms to the Universal Service Obligation (USO), to ensure rural and remote connectivity is delivered to communities using the best and most reliable technologies available.

The connectivity needs of rural and regional customers and the technology available to meet those needs has evolved dramatically since the USO was created, therefore, to ensure equitable access to connectivity and commonly used digital services for all Australians, USO reform must occur.

Sticking with the current approach will lock regional communities into outdated technologies that should be replaced by more reliable technologies.

5. Suitability of communications services during emergencies and natural disasters and support opportunities – item (f)

- Reliability of telecommunications during emergency events remains a significant concern. Narrabri is heavily flood prone, and a major flood event coupled with a telecommunications failure would create significant risk to the local population. A coordinated approach is needed across all emergency service organisations to ensure that these risks are appropriately managed, with appropriate use of the Local Emergency Management Committee (LEMC) framework. Telstra has become progressively less involved with local LEMC activities which creates a sustained response impediment and substantial community risk.
- In May 2024, Telstra commenced upgrades to its network in preparation for 5G to the community, impacting 4G user experience. The works required a series of temporary outages or reduction in mobile coverage.

Statement from Telstra states: *The works required are extensive and will temporarily impact Telstra mobile coverage at various times from Thursday, 16 May 2024, until Thursday, 23 May 2024. The first phase of disruptions will occur between Thursday, 16 May and Saturday, 18 May 2024, with daily outages between 4hrs to 8hrs every day. Network coverage will be restored at the end of the day. This will be followed by a full site outage between Sunday, 19 May and Thursday, 23 May 2024. There will be no network coverage during this period. If all goes to plan and weather permitting, residents should notice improvements in Telstra mobile services from Thursday, 23 May 2024.*

Whilst improvements in service, reliability, and capacity of local network, including 5G connectivity is appreciated by the community in Narrabri Shire, no rural or regional communities should be left without network for any extended period of time during upgrades. Telecommunication companies at a minimum, should provide alternative mobile towers, or solutions to ensure mobile networks are not impacted during upgrade period. Regional and rural Australians deserve uninterrupted access to telecommunication services, limiting disruption to business, local economies, and residents alike.

- Lack of reliability of telecommunications services, generally. As an example, a widespread power outage in a township in proximity to the Narrabri LGA was programmed by the local electricity service provider Essential Energy. This outage was widely communicated, including to the primary provider, Telstra. Given the sustained nature of this outage for major maintenance works it was recommended to this particular provider that appropriate mitigations be put in place to check and manage as required the system 'back up' batteries. This was not undertaken, and the batteries subsequently failed resulting in the entire community being without

telecommunications for over 24 hours until the electricity supply was restored. Industry accountability therefore needs to be significantly improved.

- Mobile coverage remains sporadic within our Region, and a number of blackspots affecting smaller population settlements remain. Refer previous commentary regarding the ongoing relevance and need for a suitably agile mobile black spot program.
- The frequent adverse weather events impacting our Shire, with extreme drought, flooding, has highlighted the importance of telecommunications technologies in both developing and maintaining community resilience. The majority of support information is now available online with many rural-based local businesses and agricultural operators experiencing challenges in accessing information during an already extremely stressful and debilitating time. Ongoing support and development in this space is therefore needed by the telecommunications industry and government along with recognition and acknowledgement of these prevailing challenges. It is likely that these adverse events will become more frequent with climate change, accordingly, greater industry participation and government intervention within the resilience space is needed.

I trust that the above submission provides the necessary assistance for the RTIRCs decision making. Should you require any additional information in this regard you are invited to contact Council's Director of Planning and Sustainability, [REDACTED] or Manager of Economic Development, [REDACTED] on [REDACTED] or by emailing council@narrabri.nsw.gov.au.

Yours faithfully,

[REDACTED]

[REDACTED]
General Manager