29 July 2024

Submission:
Regional Independent Telecommunications Review 2024

The Regional, Rural and Remote Communications Coalition (RRRCC) welcomes the opportunity to provide a submission to the 2024 Independent Regional Telecommunications Review 2024. Seeking wide stakeholder feedback on the importance, impact and challenges of regional telecommunications is essential to ensure the diverse needs and concerns of consumers are recognised. As representatives of rural, regional, and remote (RRR) communities and consumers, we understand the critical importance of reliable and accessible telecommunications services for all Australians, regardless of their geographical location.

The RRRCC is an alliance of 21 organisations with a shared interest in improving telecommunications and consumer protections, in RRR areas. The Coalition was formed in 2016 to raise awareness of the important role of connectivity for RRR Australians and to advocate for continued improvements, not just to infrastructure but also to consumer safeguards, quality of service standards and digital inclusion. Being a Coalition of respected volunteer and advocacy organisations, the RRRCC have relied heavily on the content of our member's submissions and recommendations in developing this submission. The RRRCC supports the submissions of each of our member organisations who have submitted to this inquiry.

RRRCC members who have provided separate submissions include:

- Australian Communications Consumer Action Network
- Isolated Children's Parent's Association
- AgForce
- Better internet for Rural, Regional and Remote Australia (BIRRR)
- National Farmers' Federation (NFF)

Various members of the RRRCC have also attended a range of consultation sessions across the country to provide feedback into this process.

RRRCC Goals

While much has been achieved, there is still more to do to ensure equitable access to quality, reliable, resilient and affordable telecommunications services for RRR consumers. The events of recent years reinforce what regional communities already know - **telecommunications services are essential**. The RRRCC revised its priorities for action in 2023 and will continue to advocate for #betterbushcomms. The RRRCC's advocacy efforts are focused on five high level goals.

The RRRCC's five goals are:

- A national regional, rural, and remote strategic framework and plan for future development and investment in regional communications,
- Affordable communications services for regional, rural, and remote Australia,
- Guaranteed access to equitable voice and data services that meet minimum service standards,
- Continued program to expand mobile coverage (both voice & data) and improvement in data speeds through increased capacity, and
- Funding and implementation of Connectivity and Digital Literacy capacity building for regional, rural, and remote Australia.

Submission from the Rural Regional and Remote Communications Coalition (RRRCC)

1. Reliability and Resilience

Our members frequently report compromised telecommunications reliability due to service interruptions caused by power outages, extreme weather events, and aging infrastructure. These disruptions significantly impact daily activities, including work, education, and access to essential services.

Recommendations:

- Prioritise infrastructure maintenance and upgrades in remote areas.
- Implement robust power redundancy solutions.
- Improve coordination between telecommunications and energy sectors to enhance network resilience.
- Ensure better alignment of activities between the energy sector and the telecommunications sector.
- Ensure all funded Government telecommunications projects mandate minimum back-up power resiliency.

2. Affordability and Access

Affordability remains a significant barrier for many of our members, particularly due to lower average incomes in rural areas. Limited competition among providers often results in higher prices and fewer service options.

Recommendations:

- Introduce targeted subsidies for low-income households in rural areas.
- Implement incentives for providers to offer affordable plans in rural areas.
- Foster competition by supporting smaller providers and new market entrants.
- Develop specific initiatives to address affordability for First Nations communities.
- Un-meter data on essential public platforms such as Services Australia (Medicare, Centrelink) and health support services.

3. Connectivity Literacy and Awareness

Our members consistently report challenges in understanding available services, choosing appropriate plans, and navigating online safety. The complexity of service options and prevalence of misinformation exacerbate these issues.

Recommendations:

- Implement tailored connectivity literacy programs for rural consumers.
- Develop independent comparison tools and resources for informed decision-making.
- Enhance the role and visibility of the Regional Tech Hub to provide targeted assistance.
- Fund and develop a Connectivity Literacy and Awareness Training Program to identify and train local champions, community volunteers and industry extension officers.
- Ensure that telecommunication storefronts are adequately trained and informed on RRR issues to eliminate the risks of products being sold that do not work in RRR areas.

4. Mobile Coverage and Capacity

Inadequate mobile coverage and limited capacity during peak times continue to be major concerns for our members, affecting residents, businesses, and emergency services.

Recommendations:

- Expedite the National Audit of Mobile Coverage to address coverage gaps and also report on areas that lack capacity.
- Increase targeted investment in mobile infrastructure, particularly in identified black spots.
- Implement measures to enhance network capacity during peak periods and encourage competition.
- Improve coverage maps with standardised data from all carriers.

5. Digital Inclusion for First Nations Communities

Our First Nations members face unique challenges in accessing telecommunications services, including affordability, connectivity, and digital literacy issues.

Recommendations:

- Expand targeted initiatives like Community Wi-Fi services and local technology solutions.
- Provide culturally appropriate digital training and support.
- Prioritise addressing the 670 First Nations communities lacking mobile coverage.

- Implement the recommendations from the First Nations Digital Inclusion Advisory group (FNDIAG) Report[1].

6. Emerging Technologies and Market Developments

While emerging technologies offer promising solutions, our members are concerned about equitable access to these advancements in rural areas.

Recommendations:

- Ensure rural areas are prioritised in the rollout of new technologies like 5G and LEO satellites.
- Evaluate and implement emerging technologies that can effectively benefit rural communities.
- Ensure new technologies are rigorously trialled and tested in a wide-ranging variety of situations over a period of time encapsulating multiple weather patterns and conditions before roll out.
- Ensure RRR consumers have adequate protection from migration processes to newer technologies.

7. Universal Service Obligation (USO) Modernisation

We support the modernisation of the USO, particularly within NBN's fixed wireless network footprint, but emphasise the need to consider rural consumers' unique challenges.

Recommendations:

- Ensure USO changes prioritise service reliability and affordability in rural areas.
- Maintain a focus on the specific needs of rural consumers throughout the modernisation process.
- Ensure RRR consumers, particularly those without adequate mobile coverage, have affordable access to telecommunications redundancy.
- Protect RRR consumers with improved Customer Service Guarantees (CSG) and in particular, strengthened installation and repair timeframes.

8. Government Investment Impact

While we appreciate the government's investment in regional communications, our members stress the importance of assessing the real-world impact of these investments.

Recommendations:

- Conduct thorough evaluations of program effectiveness in addressing identified rural needs.
- Ensure flexibility in programs to tackle emerging challenges in rural telecommunications.
- Include community engagement and post project audit metrics in all Government funded programs.

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9. Regional Communications Policy Settings

We urge the Committee to recommend improvements to regional communications policy settings that address the unique challenges faced by our members.

Recommendations:

- Design policies to encourage competition and innovation in rural telecommunications.
- Address challenges specific to rural areas, such as sparse populations and difficult terrain, in policy formulation.
- Regional advocacy and regional consumer focused groups should be invited to be engaged and present on government working groups and during industry collaboration processes.

Conclusion

On behalf of the RRRCC and the rural telecommunications consumers we represent, we emphasize the critical need for a multi-faceted approach to address the digital divide in rural, regional, and remote Australia. This approach must encompass improving infrastructure reliability, enhancing affordability, increasing connectivity and digital literacy, expanding mobile coverage, ensuring equitable access for First Nations communities, and leveraging emerging technologies. RRR consumers must be protected during migration processes and consumer guarantees must be strengthened and enhanced to reflect the essential nature of telecommunications services to rural individuals, businesses and communities. By implementing these recommendations, we can create a more inclusive and connected Australia, enabling rural residents to fully participate in the digital economy and society.

We appreciate the Committee's consideration of our submission and look forward to the positive changes that the 2024 Regional Telecommunications Independent Review can bring to our communities.