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3 September 2021

The Hon. Luke Hartsuyker
Chair
Regional Telecommunications Independent Review Committee

VIA EMAIL: secretariat@rtirc.gov.au

Dear Mr Hartsuyker

2021 Regional Telecommunications Review – Submission

Thank you for the opportunity to provide a submission on the 2021 Regional Telecommunications Review. Nambucca Valley Council considered the Issues Paper at its meeting on 2 September 2021 and resolved to forward this submission.

The black summer bushfires and COVID-19 pandemic have confirmed that high-speed and reliable broadband and mobile networks are essential services to regional communities. Digital access is as important as the physical access that Councils provide via their road and bridge networks.

Digital access is necessary for a community to realise economic opportunities; to provide for the equitable provision of government services including public health and education; to maintain social contacts and mental health; and to enable evacuation during times of natural disaster.

According to the Issues Paper mobile services are available to 99.5% of Australia's population and 33% of the Australian landmass. These statistics demonstrate how skewed the availability of mobile digital communication is with city and metropolitan areas having near universal access with the bush often having none.

One aspect which is relevant to the Nambucca Valley and identified in the Issues Paper is that Indigenous Australians and those who are socio-economically disadvantaged are more likely to utilise the mobile network for voice and data services due to the ability to "pay as you go", which provides more financial control than other forms of access which charge monthly fees.

The issues paper indicates a broad acceptance of the need for rural and regional Australia to have access to high speed and reliable digital communication. The hard part is financing this. In this respect the Committee is interested in recommendations to improve and increase engagement between different levels of government, the telecommunications industry, and regional communities and businesses, in order to make sure that telecommunications investments are equitable, co-ordinated, and responsive to the needs of regional areas.

In this respect it is noted that the Mobile Black Spot Program is becoming less sustainable as it moves into less commercial areas and the mobile network operators increasingly focus on upgrades to their existing networks.

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In response to the questions posed in the Issues Paper Nambucca Valley Council advises as follows:

1. What telecommunications services are required in regional Australia to meet current and future needs? Are there any things regional communities and businesses need to do, but can't, on their existing services?

The Nambucca Valley is a relatively disadvantaged community where there is a greater reliance on the mobile network for digital communications. In November 2019 the Nambucca Valley experienced a major bushfire natural disaster which required the evacuation of hundreds of residents from our rural area. Throughout most of the fire affected area there was no mobile coverage and an inability to provide residents with emergency evacuation advice.

The natural disaster resulted in the destruction of 64 houses and the following recovery was hampered by government agencies delivering services via digital communication when this did not exist for many affected residents. Similarly during COVID-19 which has seen even more services like health and education delivered digitally the mobile blackspots across much of our rural area are disproportionately affecting our rural residents and particularly those who have socio-economic disadvantage.

2. What changes in demand, barriers or challenges need to be addressed when it comes to telecommunications services in regional, rural and remote Australia?

There needs to be increasing awareness that access to fast and reliable digital communications has to be a community service obligation or the economically and socially vulnerable are going to be left further behind.

3. How have the Government's policies and programs affected telecommunications service outcomes in regional, rural and remote Australia? How can these be improved?

It is agreed that the Government's Mobile Black Spot Program has been essential for improving digital connectivity in regional, rural and remote Australia. However as Telco's withdraw their interest as less commercial outcomes are encountered there should be more broadly based grant programs which can draw on the financial support of all levels of government as well as the residents who benefit to enable the provision of more finance. The Council has also become aware of smaller, micro-network solutions which may be a cheaper alternative for isolated communities which have no mobile service.

4. How do service reliability issues impact on regional communities and businesses? How do outages, including in natural disasters, impact on communities and businesses?

The feedback Council has received from its residents is that our digital telecommunications services are less reliable than the analogue system they replaced. The forecast reliability and coverage of the NBN wireless service seems to be less than what was initially promised. There does not seem to be widespread availability of back-up power sources in the instance that the electricity supply is lost due to trees across power lines or in the case of bushfire with power poles being burnt.

5. How might such impacts be addressed to ensure greater reliability? How can the network resilience be addressed in regional areas?

Back-up power sources, presumably batteries, need to become more commonplace. The quality of some of the installed NBN wireless equipment seems dubious.

6. How did the use of digital services change for regional consumers and businesses during the response to the COVID-19 pandemic? What insights for future service delivery does this provide?

The response to the pandemic wherein telephone medical consultations have become commonplace and students have had to revert to home schooling has accelerated the shift to digital services and the need to regard them as a community service obligation and indeed a basic human right.

7. What can be done to improve the access and affordability of telecommunications services in regional, rural and remote Indigenous communities?

As discussed more broadly based grant programs that seek funding contributions from other levels of government, non-government organisations as well as benefitting businesses and residents will be needed to ensure an on-going reduction in mobile blackspots.

There is always value in Government seeking a financial contribution from those who will benefit from the service as 100% grant funded programs are more likely to result in a misallocation of resources.

8. How can investment in telecommunications infrastructure work with other programs and policies to encourage economic development in regional Australia?

As per question 7.

9. What role could innovation, including new models, alternative investors or new ways of doing business, play to encourage investment in regional telecommunications infrastructure? What are the barriers?

There may be an increasing role for less expensive micro-nets to cover mobile blackspots funded by more broadly based grant programs which require “buy-in” from other levels of government, non-government organisations and benefitting businesses and residents.

10. To what extent will new technologies enable significant change to the delivery of telecommunications services in regional Australia over the next 5-10 years? Are there any barriers to accessing these technologies?

Council is aware of opportunities with new low orbit satellites and also micro-networks. Similarly there is significant progress being made in alternative solar power and battery storage. These new technologies are likely to enable significant change but Council is not sufficiently informed as to say which will provide the most cost/benefit.

11. How can Government better support the rapid rollout of and investment in new telecommunications solutions in regional areas?

Refer to answers to questions 7 and 9.

12. How can different levels of Government, the telecommunications industry and regional communities better co-ordinate their efforts to improve telecommunications in regional Australia?

More broadly based financing arrangements supported by better technology.

13. *What changes to Government investment programs are required to ensure they continue to be effective in delivering improved telecommunications?*

Refer to answers to questions 7 and 9.

14. *How can regional consumers be better supported to identify, choose and use the best connectivity options for their circumstances, as well as to understand and use their consumer rights?*

Council is not sufficiently informed to provide an opinion on this.

15. *To what extent is public information on connectivity options, including predictive coverage data and speeds, sufficient to help regional customers make informed decisions? What other information is needed?*

Council has received feedback that the predictive coverage data and speeds for the NBN wireless network were different to the reality. There have been previous inquiries in relation to specified service levels not being delivered and telco providers not being aware or not checking on service delivery except in response to complaints. There needs to be further consumer protection in relation to this.

16. *What other matters should the Committee consider in its review and why are they important?*

At the Council meeting there was discussion about increasing concern in relation to the security of data in the digital network. As more services move on-line the risk of fraud and corruption through insecure data increases. Free on-line training in IT security should be made available to all Australians. As well there should be a legal onus for on-line services and retail sites to apply appropriate security standards to their websites and on-line transactions.

The Council would be pleased if you could consider its submission in the preparation of the 2021 Regional Telecommunications Review report to the Minister for Regionalisation, Regional Communications and Regional Education.

Yours faithfully



Michael Coulter
GENERAL MANAGER