Submission to Regional Telecommunications Review
Mid North Coast NSW
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Authority is provided to make this submission public

Submission contributions:

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Foreword

Regional Development Australia Mid North Coast (RDAMNC) is proud to present this submission to the Committee for the 2021 Regional Telecommunications Review (the Review).

All Councils within the Mid North Coast Region responded to RDAMNC's call out to deliver a combined response to the Review. These Councils include Coffs Harbour City Council, Bellingen Shire Council, Nambucca Shire Council, Kempsey Shire Council, Port Macquarie-Hastings Council and MidCoast Council.

Reliable, affordable and accessible telecommunications systems are essential to enable the Mid North Coast to move forward as a region. While there are parts of the region that enjoy fast and reliable connectivity, reliable connectivity across broadband and mobile services was reported as patchy across the region.

Adoption of online services has increased exponentially in the past years with streaming services, online gaming and social media increasing in the private domain and cloud-based services and e-commerce growing in the business community.

The Covid-19 Pandemic Lockdowns created a new demand on our telecommunications services as we juggled home schooling, video conferencing and tele-health services from home.

It is important to note Councils in the Mid North Coast region have experienced dire events in the past two years spanning bushfires, floods and pandemic. Reliable telecommunications systems are essential in ordinary times, however in times of crisis they may mean life or death. It's fair to say this period of time has highlighted both the best and the worst of our telecommunications options.

During bushfires, residents were frustrated, angry, and extremely challenged by how quickly telecommunications to private phone numbers were lost in the areas affected by the fires. In some parts of the region, these fires continued to burn for another 10 weeks, which meant in this time residents only had access to ABC local radio for very generic advice on fire activity in their area.

This resulted in residents not being able to access information from Fires Near Me, and not being able to make informed decisions about the safety of themselves or their property. This meant residents were not able to easily contact emergency services when they needed emergency assistance or contact any other recovery agency for disaster recovery assistance, or even simply tell family and friends they were safe. For many of these rural residents, leaving their homes was not an option, with RFS stretched beyond capacity, they had to stay and defend their properties and care for remaining stock. A return to normal life and the operation of local business was simply not possible while telecommunications were not functioning.

The Councils generally felt the Mobile Blackspot program alleviated connectivity issues to some degree, however, would welcome both further rollouts of the program and also the exploration of different technology to reach more challenging topographic environments.

While telecommunications infrastructure is largely a government concern, it is also important to hold telecommunications providers to account and to find ways to better enable (or require) these services to provide better levels of customer service throughout the region, to troubleshoot and provide timely access to services (particularly in times of disaster) and to provide solutions for our more vulnerable community members.

Yours Sincerely

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About Mid North Coast of NSW

For the purposes of this report the Mid North Coast region is defined as the region spanning Coffs Harbour in the North to Taree in the South. This region encapsulates the Local Government Areas of Coffs Harbour, Bellingen, Nambucca, Kempsey, Port-Macquarie Hastings and the (former) Greater Taree precinct. We also acknowledge the broader MidCoast Council region which is also referred to within this submission.

The Mid North Coast has a population of around 272,797 people. Fuelled by business opportunity and lifestyle advantages, the population has been growing steadily at 1% pa for the past 10 years. The latest forecasts estimate the region to grow to 277,450 by 2021.

The median age of people in the Mid North Coast is 47, however there is also a large population of ageing and other vulnerable people to consider in the delivery of an effective telecommunications services.

Regional Telecommunications Review framework

The review addressed 3 key themes:

- Adequacy
- Opportunity
- Awareness

And nine sub-themes

- Changing demand
- Service reliability
- Covid-19
- Indigenous Australia
- Regional Development
- Emerging Technologies
- Maximising Outcomes
- Education
- Public information

RDAMNC developed a survey using the questions outlined in the Regional Telecommunications Review 2021 Issues Paper. All Councils responded to the survey and RDAMNC collated the responses.

Regional Telecommunications Review 2021 Response

In many parts of the Mid North Coast there are challenges in accessing all of the three modes of telecommunications mentioned within the Issues Paper (mobile voice and data, broadband internet and (to a lesser extent) fixed voice services. These challenges are exacerbated in times of disaster. By and large the LGAs surveyed did not feel adequate access to telecommunications services exists throughout the region to serve current or future needs.

The submission contributors (the contributors) identified an increased and growing reliance on data to drive the economy, particularly as more services are offered via cloud in real time via Software as a Service (SAAS). E-commerce systems were also impacted through poor connectivity making in nearly impossible for some businesses to trade.

> *According to the Coffs harbour Employment Lands Chapter 2020, there is a growing demand for co-working spaces of less than 200sqm, with evidence suggesting faster take-up by co-working tenants compared to traditional tenancy arrangements. Furthermore, advancements in technology and communication connectivity has enabled more people to work from home or other suitable shared spaces; and this has changed considerably since Covid-19 with an uptake of people moving to regions. Coffs Harbour LGA will continue to see an emergence of small businesses and remote workers that are locating to the LGA for its lifestyle offering and Work From Home capacity. However, this raises the adequacy of home internet coverage in circumstances when all household members are using the internet simultaneously.*

Lacking telecommunication services makes it difficult to attract new industries to the Mid North Coast which require fast connectivity. These industries (including but not limited to) advanced manufacturing, creative and digital industries offer an appealing proposition to potential relocators with affordable land and clean, green landscapes.

97% of businesses in the Mid North Coast are best described as small or micro businesses, they need access to reliable high-speed internet with affordable prices and appropriate business level service agreements.

> *Coffs Harbour has a small but expanding tech-based industry sector – SaaS providers which is expanding around the e-learning space and geospatial & environmental monitoring. We also have a growing creative industry sector which has a strong demand for high data transfer speeds. This sector and its demands on the infrastructure are only set to grow, especially with the recently announced $438 million investment in Australia's first fully integrated feature film production and post-production complex to be built in Coffs Harbour. There is great opportunity for this and other tech-based companies to grow in the future, but this is*

directly reliant on high speed, low latency internet with appropriate service level agreements. Fast broadband – available 24/7 so to meet peak demands. Many parts of regional NSW still do not have adequate access to consistent and regular internet coverage.

Households also have increased requirements for telecommunications as streaming services become more of a household norm. Covid-19 lockdowns required households to explore never before considered applications of their online environment from home schooling to disbursed workforces requiring high levels of video streaming.

Many medical services (particularly mental health services) opted for telehealth models during Covid-19 and for some this will be an ongoing service offering.

Councils would welcome additional funding towards smaller infrastructure projects, such as small cell technology.

The ageing population is another consideration for the Mid North Coast as residents may find accessing telecommunications services to be difficult and often unreliable (a particular concern in medical emergencies if our ageing population are to stay at home longer).

While The Black Spot project has addressed some of the gaps in mobile phone networks throughout the region (as demonstrated in figure 1 below), there are many remaining blackspots, arguably some may never be remediated via technology suitable for the Black Spots program.
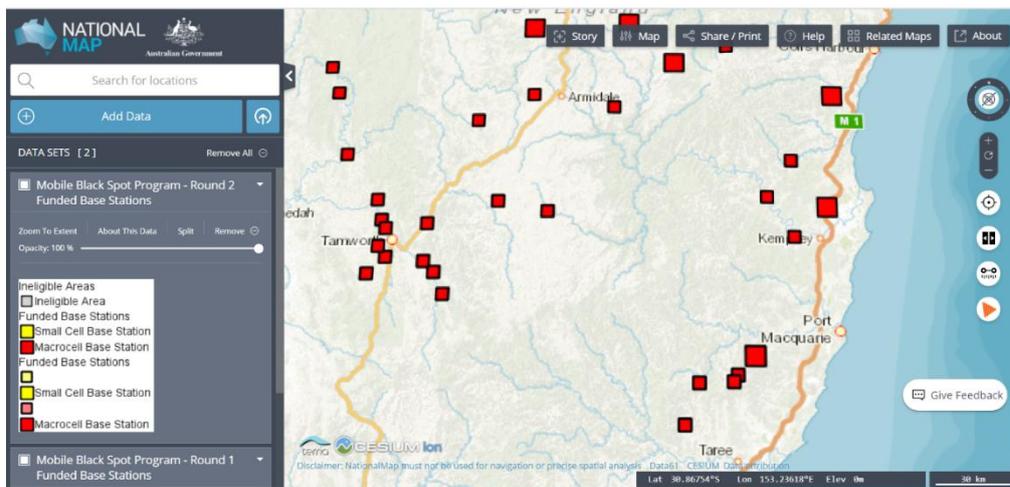
Mobile Black Spot Program – Round 1 Funded Base Stations

Information about other programs has not been widely spread and does not always reach the more vulnerable members of our communities.

The contributors clearly demonstrated demand for connectivity across Mobile and Broadband networks which are reliable, affordable and accessible. The region requires government to respond by providing infrastructure that will withstand natural disaster and programs which can assist our more vulnerable people to access services.

Communities cannot reliably count on mobile phones, copper wire-based phone lines, and the newer forms of telecommunications to work during natural disasters and keep them connected. Mobile phone coverage is a BIG issue. Many regional spots have patchy, or no mobile coverage. It's an issue at the best of times, but in emergency situations is an even bigger issue. If someone needs emergency assistance, but their mobile phone doesn't work it could be disastrous. Families are impacted by telecom services and failure thereof by not being able to access the internet.

According to the Creative Hotspot Analysis Coffs Harbour 2021, the early rollout of NBN and fibre to the premise delivery has been an advantage for Coffs Harbour. However, there was strong criticism of the NBN in Bellingen, which has a number of technologies available (Fibre to the Curb (FTTC), Fibre to the Node (FTTN), Fibre to the Premises (FTTP), Hybrid Fibred Coaxial, (HFC), Fixed Wireless and Satellite). Different areas have been given different services depending on their location. Some rural locations in both Bellingen and Coffs Harbour are flood-prone, so fibre to the node can cause problems. Some areas are obscured from reception from the wireless technology. Businesses in the Coffs Harbour LGA participated in an online survey for the Employment Lands Chapter of the Local Growth Management Plan in 2019. Some business still reported poor NBN access as some of the worst attributes of businesses' current locations.

Service reliability issues create a loss of productivity for region's business community as valuable productivity time as Broadband is inadequate, unreliable or too slow to transfer large files, drive online meeting facilities and e-commerce.

Ultimately this impacts the region's ability to attract new industries, particularly those requiring reliable telecommunications to trade. In turn this makes it more difficult for the Mid North Coast to pivot its reliance on tourism industries to emerging industries such as advanced manufacturing, digital technologies and creative industries.

Lack of connectivity also means that important messaging from emergency services and government entities is difficult to distribute. The flow of information throughout the Pandemic has been critical.

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Service outages naturally disrupt business and life throughout the region. The catastrophic bushfires and flooding in the Mid North Coast had dire results across the region.

> *During bushfires, residents were frustrated, angry, and extremely challenged by how quickly telecommunications to private phone numbers were lost in the areas affected by the fires. In some parts of the region, these fires continued to burn for another 10 weeks, which meant in this time residents only had access to ABC local radio for very generic advice on fire activity in their area.*

Lack of connectivity during crisis periods means that any disaster will become exacerbated from both a physical safety and also mental health safety perspective.

Business owners are often time poor so to have to come back to web-based activity time and time again provides lessened productivity within business.

There are also financial impacts for some community members and businesses with accelerated phone bills due to having to change over to a mobile service, using multiple services or exceeding data limits.

> *The Nambucca LGA experienced the Kian Road bushfire natural disaster in November 2019 with 63 homes destroyed. Much of the bushfire impacted area has no mobile coverage. In some instances, emergency evacuation orders had to be provided by a helicopter flying ahead of the fire front using a loudspeaker to tell residents to flee. The disaster recovery has been impeded by the public sector's reliance on digital communications to provide services. Many of the residents who lost their homes had no digital communication.*

One Council suggested local bodies such as the Rural Fire Service (RFS) need more capacity to understand how to troubleshoot telecommunications infrastructure, particularly during power outages. It was suggested the RFS may be enabled to install and fuel a portable generator at phone towers and exchanges in order to keep communication channels open in a natural disaster when power disruptions are likely to be extensive.

Telecommunications infrastructure was a dire concern during natural disasters and there was a general call for more robust and resilient telecommunications infrastructure for the following reasons:

- Poles and wires systems are currently very vulnerable to fires and storms
- Telephone exchanges and mobile phone towers that have mains power prone to electric power disruptions and alternative power supplies are very limited.

- While batteries have been upgraded on some towers, many exchanges have not. In remote areas in the MidCoast, it is common for a simple power outage caused by a branch falling on a power line will result in an outage that lasts for 8 hours. Telstra has told us some exchanges only have a backup battery life of two hours.
- Arrangements for local RFS or similar community-based volunteer organisations to ensure backup generators are kept fuelled to allow mobile phone towers and telephone exchanges to stay online during significant natural disasters - when residents have a real need to be able to communicate with emergency services around their safety.

Communities cannot reliably count on mobile phones, copper wire-based phone lines, and the newer forms of telecommunications to work during natural disasters and keep them connected. Mobile phone coverage is a BIG issue. Many regional spots have patchy, or no mobile coverage. It's an issue at the best of times, but in emergency situations is an even bigger issue. If someone needs emergency assistance, but their mobile phone doesn't work it could be disastrous. Families are impacted by telecom services and failure thereof by not being able to access the internet.

Regionally based Optus and Telstra staff and/or dealers were proactive during the Bushfires. Optus had mobile Boosters installed at numerous community halls throughout the region, and both Optus and Telstra distributed phones to bushfire impacted community members.

Unfortunately, not a lot of additional services reached bushfire nor flood impacted communities, not at least to offer enough support to enable impacted community members to effectively undertake the completion of extensive online forms for insurance and government funding claims, or to access the range of telehealth services available particularly regarding mental health.

Impacts of network outages in emergency events could be addressed by examples such as portable towers that can be brought into areas during an emergency, even if there is one or two central points within a community. Education is key before an event to ensure community know about such initiatives. Provide more engaging community education about being better prepared for disasters, supporting locally led initiatives already in community and educating businesses to have a business continuity plan in place. Provide free data for residents who have lost homes, lost services for the duration of their need.

More systems are required to support the penetration of the mobile phone network into areas where traditional telecommunications are geographically constrained.

Additional support is also required to individually target aged residents to switch to alternative telecommunications technology (not copper wire services).

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The Covid-19 lockdowns have placed a reliance on home internet connections to a degree that hasn't been experienced before. Not only are the household adults working from home (a trend that will continue in numerous workplaces), school children are learning from home and routine and crisis household appointments (such as counselling and support) are also being conducted using the home telecommunications connections.

While lockdowns are said to be alleviating as vaccination levels rise, some work / access from home trends will not decline.

Reliable, affordable and accessible connectivity is more important now than ever before.

The Covid-19 pandemic has also required regional consumers to become more tech savvy, at the very least via using QR codes to sign in and for many accessing the MyGov App to transition towards a vaccination passport. The successful Dine and Discover program has also encouraged more consumers to utilise digital technologies.

Consumers are required to be more connected than ever before. We need a telecommunications service that can keep up with our growing connectivity needs.

During the lockdowns of the pandemic all Coffs Harbour LGA businesses were challenged with the task to switch to rapidly to more online operations. Be that utilising cloud-based technology, working with a distributed workforce or increasing the online sales and marketing channels.

Upskilling of businesses is a key challenge for them to be able to utilise digital marketing, SaaS tools and other services more efficiently and effectively. Many are lack the skills or knowledge to be able to transition easily. Digital capabilities need to be increased across the board. For the small businesses and sole traders who are always time poor and stretched across roles of running a business they need streamlined information and processes to be able to get moving quickly. Increased usage of web-based activity including for home schooling, business and advisory means that messages are delayed or not actioned In Council's support for disaster affected individuals and people we are collaborating with other recovery partners to connect community through online platforms.

Many of our Traditional Custodians face the same connectivity challenges as their non-Indigenous counterparts. However, with proportionately higher levels of disadvantage, access to effective telecommunications services, particularly through the lens of affordability is likely to be a challenge many people throughout the community will experience.

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Services such as the Bowraville Community Technology Centre (CTC) provide community members with affordable and accessible access to the Internet when they do not have in-home services.

> *Some service providers have been working to provide laptops to vulnerable families to assist with home schooling during the pandemic. They do valuable work but don't have enough funding to address everyone's needs.*

Exploring subsidised pricing, or municipal connection models may support these community members.

It is also important to note while the majority of houses in the Mid North Coast were connected to the Internet at the time of the 2016 Census (79.2%), there were still 34,561 households not connected and a further 18,318 households who did not respond to the question. With 60% of households throughout the region earning less than $2,000 per week it's fair to assume telecommunications, particularly internet is an unaffordable luxury.

Alignment between business and government is critical in implementing a logical approach to telecommunications infrastructure investment. Installing infrastructure for cost effectiveness, or perceived access to a population alone will never solve the ongoing issues of access to telecommunications services.

Working partnerships between Councils, economic development agencies and industry could better enable solutions which appeal to clusters of businesses and ultimate business relocations.

> *We need developers to contribute to infrastructure upfront and ensure that every new development has flood access, and telecommunications embedded in. People have been paying for high-speed services that are non-existent, let's regulate this.*

> *Council's experience is that Telco's tend to limit their capital investment to the funding available under the Black Spot program. There was an example of a Black Spot program tower installed at Taylors Arm where an additional minor investment in another location would have significantly increased subscribers, but the Telco proceeded with the inferior location because that was the cost that could be met by the Black Spot funding.*

> *Given the recent disasters in our area and the raised awareness of the inbuilt telecommunications infrastructure vulnerabilities, remote communities are also starting to look for advice on alternative telecommunications systems that can be utilised in an emergency, and how these can be set up on the individual private property or operate through a community hub. Investment in alternative networks or investment in*

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telecommunication brokers able to work with individuals and communities is also needed, as geographical locations, individual demographics and financial resources result in many variables around optimal telecommunications for any specific circumstance.

The addition of skills-based programs on the use, opportunity and future needs of technological business solutions is important to allow development of economic opportunities within region – matched to the infrastructure provided.

Competition in regional areas for Telstra and NBN is essential.

> *A big role, we need upfront commitment not promises. With regional growth it is not a nice to have but a necessity. We need to think about our remote communities, which without thought out and innovative development, will put people's lives at risk.*

The contributors called for more transparency on the standard of services and increased investment in the mobile blackspot program.

> *Digital communications are a community service obligation rather than a commercial undertaking.*

It was also noted that Telecommunications should be part of all business planning and urban growth strategies.

The contributors noted a role for government in providing more comparison of services and while the Regional Tech Hub offered a good program it was not widely recognised.

> *Consumers would also benefit from knowing what their rights are under the Universal Service Obligation and under what circumstances they can ask the Telecommunications Ombudsman to intervene. In a small percentage of cases, regional consumers have very limited opportunities to use their consumer rights as their telecommunications have failed so catastrophically, they have no easy viable option for petitioning for their access to be restored/remediated.*

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Call Centres fielding phone calls from residents in such areas regularly did not understand the challenges faced by these residents and did not allow community members to report faults on behalf of someone else as they weren't the account holder. Quite often Telstra technicians are sent out to remote properties to repair a fault. Once mobile phone reception was lost, technicians would not have enough information downloaded to easily locate the fault as reported. In addition, there can frequently be multiple faults on one property or one property with several customers. The technicians would not have the authority to investigate any of these other faults while on site. These remote properties would be a 4 hour round trip from the service depot. It is also reported that Telstra and other Telcos would ask their customers to verify their identity by responding to the SMS just sent to them when they would be over 50 km from mobile phone reception, and it was logistically impossible. The amount of time taken by Telstra to rectify individual faults in some cases takes months and results in individual consumers without any reliable way of being connected. It is strongly recommended that Telcos should be given the responsibility to ensure an alternative telecommunications connectivity is available when faults are not quickly resolved, regardless of whether the customer has priority access or not.

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