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2021 Regional Telecommunications Review Secretariat
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Submission to 2021 Regional Telecommunications Review

RDA NT is a not-for-profit organisation which aims to strengthen regional communities through collaboration between government and non-government organisations.

We have a strong understanding of the economic and social challenges faced by the NT and an appreciation of the role that telecommunications can play in overcoming and mitigating some of these challenges. This appreciation stems from:

- our past involvement with organisations such as Broadband for the Bush and ACCAN;
- individual experiences relayed to us by many and varied stakeholders spread across the Territory; and
- our own practical experience as a partner in a pilot project that has successfully delivered a more affordable and reliable solution for high-speed internet into very remote communities in Central Australia.

With this in mind, we ask the Committee to consider the following:

Mobile roaming as a means to address lack of choice and affordability

Domestic mobile roaming should be permitted in parts of outer regional, remote and very remote areas to address the lack of choice (of service provider) and affordability issues. It makes no sense that international visitors to Australia may connect to any mobile carrier, but that Australian residents, who subsidise the mobile network through taxes and the MBSP, cannot. Furthermore, if mobile roaming were allowed then a significant proportion of "black spots" would disappear.

To overcome this issue no future mobile infrastructure (towers) should be constructed under the MBSP (i.e. subsidised by the tax payer), unless they are specifically built to facilitate shared infrastructure; this would represent a more proper use of tax payer resources.

Domestic mobile roaming could also overcome the issue of some residents of remote communities being sold mobile phones that will not work in their home community because the mobile carrier in their community is not the same provider of the mobile service (or retail outlet) used in town.

Although dual SIM smartphones are becoming more common, they are not a solution for people on low incomes because most Australian telcos don't like selling dual SIM services and require customers to purchase the device outright, which is expensive. For people with low digital literacy they can also be complicated to understand and operate. As a solution, use of dual SIM smartphones in remote and very remote areas simply shifts the cost burden onto resident consumers who can least afford it, and who are already subject to higher costs of living.

Connectivity options in remote and very remote communities

There is a prevailing view that connectivity in remote and very remote Indigenous communities is best achieved through a model based on mobile broadband and/or free public wi-fi. Some issues with this model include:

- it limits people to an insecure way of accessing the internet, public wi-fi is not secure and the locations of the wi-fi are often such that people have to sit in public places to access it, this is not appropriate for undertaking activities which should be private such as telehealth, banking or accessing Government services such as Centrelink; and
- mobile broadband is expensive and unreliable for livestreaming and videoconferencing as there is often a lack of available bandwidth to stream video and audio, people therefore pay a premium (i.e. the “poverty premium”) for data.

Whilst some may argue that public wi-fi is the most cost-effective means for providing internet connectivity in remote communities, we suggest it is time to challenge this view and aim higher. It is worth remembering that, in the early days of remote public housing, it was common to provide only shared (communal) ablution facilities for residents, nowadays no one would dream of public house with no bathroom or laundry.

There is a strongly held belief that, because of the high degree of residential mobility in remote Indigenous communities, coupled with a preference for pre-paid devices, mobile connections are best. We argue that connectivity is an essential service. Houses in remote communities are connected to water and electricity, provision of a fixed connection to the internet should also be the norm.

Fixed connection (home internet) can and does work in remote communities, as the 2016 longitudinal study of Home Internet showed. The main barrier is a lack of willpower to develop a streamlined process to enable this to happen, as well as an appropriate billing model for fixed connections (pre-paid, portable accounts) that can work in this context. A model similar to that in place for power (i.e. power cards) could be explored in the first instance.

We are firmly of the view that Indigenous economic and social development will continue to be constrained if access to the internet in these communities remains limited to the public wi-fi and mobile broadband model with their inherent limitations and costs.

NBN Initiatives are constrained by the ROI mandate

We note that NBN has looked to develop various initiatives to improve connectivity for regional and remote Australians. These efforts are welcome. However, programs such as the Regional Co-investment Fund (RCIF) are constrained by the requirement for the NBN to provide a ROI. This requirement perversely undermines the efficacy of these programs in some of the very areas that they were meant to serve (e.g. remote locations or impoverished communities).

More specifically, this perversity is manifested in two ways:

- the RCIF program requires co-investment by federal, state/territory or local government, the councils servicing remote and very remote NT have tremendous service challenges and very limited capacity to make these kinds of co-contributions; and
- assessment criteria are weighted heavily towards commercial considerations (i.e. applications must meet NBN's Commercial Investment benchmark) which is detrimental to applicants lacking a population base (neither social nor industry benefits can be measured on a per-capita basis).

The RCIF program, while well-intentioned, will be most effective for outer regional areas. We need to adjust the funding model to addressing the gaps and challenges in telecommunications services in remote and very remote areas.

In addition to our remarks above, we have also attached a copy of our 2018 RTIRC Submission, as many of the points raised previously remain relevant to the current review. In particular:

- issues regarding the continuing digital divide;
- market failure and behavior of monopolies in remote parts of Australia; and
- lack of a dedicated Regional and Remote Telecommunications Strategy.

Further to the last dot point, and whilst we welcome the 2021 Committee's desire to look for "ways to improve collaboration … to make sure that investments in telecommunications are coordinated and deliver to regional needs", we note that there have been numerous calls over the past 3 RTIRCS for the development of a regional and remote telecommunications strategy. Such a strategy is surely the most appropriate mechanism to achieve the collaboration the Committee seeks, and to deliver outcomes on the ground that will bridge the digital divide. Yet still, no such strategy exists.

The digital divide in remote Australia is widening. As most Australians are experiencing unprecedented advantages from engagement in an 'online world' remote residents are becoming more and more isolated and disadvantaged by their inability to keep up with the pace of change. Until we meaningfully shift this metric it seems clear that our approach to regional telecommunications needs further adjustment.

Yours sincerely

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3 August 2018

2018 Regional Telecommunications Review Secretariat
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Submission to Regional Telecommunications Review 2018

Accessibility, affordability, lack of digital literacy skills and limited choice remain key barriers for people in outer regional and particularly remote and very remote areas, this remains unchanged since our 2015 RTIRC Submission. The potential solutions for addressing these barriers should not be introduced in an *ad hoc* fashion, but rather as part of an overall Remote Telecommunications Strategy which includes an overarching digital inclusion framework. We commend the AIDA submission and their call for the development and implementation of a Regional and Remote Digital Inclusion Strategy.

While the rollout of the NBN and successive rounds of the Mobile Black Spots Programme (MBSP) are welcome and have improved connectivity in some areas, the fact must be faced that despite these developments the *2017 Australian Digital Inclusion Index* found that there remains a digital divide between rich and poor, city and country[1]. We suggest that, in light of these findings, Government needs to reconsider its telecommunications policy. Clearly the NBN and MBSP will not offer the solutions to all of regional and remote Australia's telecommunication needs.

[1] Thomas, J, Barraket, J, Wilson, C, Ewing, S, MacDonald, T, Tucker, J & Rennie, E, 2017, *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017*, RMIT University, Melbourne, for Telstra, p5, 6, 13. Available on-line at https://digitalinclusionindex.org.au/the-index-report/report/ [accessed on 31/7/2018]

These findings reinforce the case for the development of a much more nuanced remote telecommunications strategy, one which also recognises and actively supports backhaul solutions and alternative and emerging technologies as a pathway to improved coverage, reliability, affordability and greater choice. Such a strategy should also consider how best to provide post-installation/sales support to end users in remote and very remote areas, many of whom (particularly in Indigenous communities) have limited IT knowledge and skills.

More work needs to be done to provide flexible and user-friendly arrangements around installation, plan options, and billing for remote consumers. Apparently basic tasks such as accessing information regarding how to get an internet connection, types of plans available, and simply attempting to arrange for a connection remain problematic in many remote Indigenous communities. These issues are described in *Internet on the Outstation*[2] which was the result of a longitudinal study on home internet in several remote Indigenous communities in the NT, this report remains relevant today.

We urge the Committee to recommend that the Australian Government work with all levels of government and other stakeholders to develop a Remote Telecommunications Strategy which includes addressing digital inclusion.

It is our experience that market failure continues to characterise the telecommunications industry in remote and very remote NT. Unfortunately some government programs, such as the MBSP, while increasing access to services for consumers, have perversely exacerbated this market failure by further entrenching the dominant telco. This results in fewer choices for consumers which in turn impacts on affordability.

We note the Committee's interest in hearing from businesses and other organisations that are installing telecommunications infrastructure in regional Australia[3]. We would like to draw the Committee's attention to the Northern RDA Alliance's high speed wireless internet project, which aimed to test the capability and affordability of alternative backhaul solutions. Connectivity has been achieved through the construction of long-distance point-to-point microwave links that connect directly to Vocus (previously Nextgen) fibre.

All design parameters have been exceeded. Final throughput exceeds 300Mbps aggregate (design 80Mbps), latency is less than 6ms (design 12ms) and jitter is less than 1ms. The network covers a total distance of around 320kms with the greatest distance between two links being 53km. The total cost to install the system (including cash and in-kind support from all project partners) was around $500,000. Technical project challenges mainly related to tailoring the infrastructure and service to meet the needs of the clientele as well as the need for the infrastructure to be lightweight and unobtrusive in the landscape.

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[2] Rennie, E, Hogan, E, Gregory, R, Crouch, A, Wright, A & Thomas, J. 2016, *Internet on the Outstation: the digital divide and remote Aboriginal communities*, Theory on Demand 19, Institute of Network Cultures, Amsterdam. Available on-line at http://networkcultures.org/wp-content/uploads/2016/06/TOD19-Internet-on-the-Outstation-INC.pdf [accessed 31/7/2018]

[3] *Regional Telecommunications Review 2018 Issues Paper*, p11-12.

The completed project has demonstrated that cheaper alternative backhaul solutions are possible in very remote areas and can provide a superior service to satellite. These types of solutions could be used elsewhere in the NT and across Northern Australia, as well as in other sectors, such as primary industries, that need access to high speed, reliable, internet. However, it is important for the Committee to understand and acknowledge that these solutions (and flow-on benefits such as greater competition, better customer experience, greater productivity for both the public and private sectors) will not be realised in areas where smaller providers have to compete with a long-established incumbent player that is prepared to protect their monopoly.

Given the extent to which mobile connectivity has featured in the *Issues Paper*, we are concerned that the Australian Government has not committed to funding the MBSP beyond 2019-2020, despite there being in excess of 10,000 mobile black spots on the database.

We urge the Committee to recommend that Australian Government funding for the MBSP continue beyond Round 4.

In order to ensure greater choice for end-users (and to avoid perverse outcomes of the type already referred to in this submission) we also urge the Committee to recommend that the criteria around co-location and roaming be strengthened so as to comprise a greater percentage of the overall points.

Of the final 867 base stations that will be established as a result of the previous three rounds of the MBSP, only 2.3% will be in the NT. It is in this context that we argue that any new economic and social indicators should not disadvantage those areas that are already disadvantaged by isolation and low population. Instead, we suggest that additional indicators should relate to how the installation of mobile coverage will contribute to Government policy objectives such as Closing the Gap and Developing Northern Australia. Or, for example, investing in communications along critical rural and remote freight routes in accordance with the recommendations of the *Inquiry into National Freight and Supply Chain Priorities.*

It is also important that mobile connectivity is considered a complementary form of connectivity, and not the sole form of connectivity, particularly in remote and very remote areas. Page 13 of the *Issues Paper* flags a potential scenario whereby more consumers use mobile networks rather than fixed line networks with the savings from supplying the copper services directed to additional investment in mobile services. Mobile is a relatively expensive form of connectivity and mobile devices are more limited in capacity than desktops or laptops, which impacts upon the types of activities that can be successfully undertaken[4], and in turn participation in a range of economic and social activities.

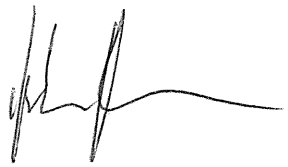
[4] Thomas et al 2017, p24

An RDA NT staff member who relies heavily on the 4G network for voice and data has found that this type of connectivity is inadequate to allow real-time participation in webinars, Skype and other activities requiring a reliable high-speed connection. Remote and very remote communities should not be forced to rely on a single form of connectivity that will be expensive and that may not allow them to fully access a range of health, education and other services on-line. Such a solution would not be equitable in terms of affordability and particularly not in terms of access given that on-line services are of much higher importance where extreme remoteness is a factor.

Regarding the preference for mobile devices and pre-paid billing in Indigenous communities[5], the Committee should be cautious in concluding that mobile is an appropriate solution for all Indigenous communities. Some communities have been ambivalent about the introduction of mobile because of the risk of cyberbullying. We are aware of a recent situation in which some Indigenous people in a very remote community called for the mobile tower in their locality to be switched off for a period due to an escalating local dispute. We also draw the Committee's attention to the findings of the *2017 Australian Digital Inclusion Index*, notably that mobile-only users are less digitally included than the general population[6].

The Issues Paper indicates that the Committee will also consider relevant views from the Consumer Safeguards Review. We take this opportunity to refer the RTIRC Committee to submissions made to the Joint Standing Committee on the National Broadband Network as a number of these submissions contain information and observations that are highly relevant to the current Review.

Yours sincerely



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[5] *Regional Telecommunications Review 2018 Issues Paper*, p6.
[6] Thomas et al 2017, p24.