Enquiries: Edward Sims
Phone: ████████████
1300 007 662 (via Customer Service)
Our Refs: D21/79144; D21/78995

30 September 2021

2021 Regional Telecommunications Review Secretariat
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
CANBERRA ACT 2601

Via email: secretariat@rtirc.gov.au

Dear Secretary

Re: Response to Issues Paper July 2021

Thank you for the opportunity to provide a response to the current review into regional telecommunications. I enclosed with this letter our response on behalf of Council, which has also been uploaded to your website this date.

If you have any further queries regarding this matter, please do not hesitate to contact Council's Manager Economic and Community Development, Ed Sims, on one of the numbers listed above.

Yours sincerely

Julie Reitano
Chief Executive Officer

Maranoa Regional Council
Cnr Bungil & Quintin Streets
Roma Queensland 4455

PHONE 1300 007 662
FAX   07 4624 6990
EMAIL council@maranoa.qld.gov.au

PO Box 620, Roma Qld 4455
ABN: 99 324 089 164
www.maranoa.qld.gov.au

Subject: Maranoa Regional Council – Response to Issues Paper – Regional Telecommunications Review 2021.

Introduction:

The Maranoa local government area (the Maranoa) is in Queensland's south-west and covers an area of approximately 59,000 square kilometres. The region's main township and administrative capital, Roma, is approximately 350 kilometres from the major service hub of Toowoomba and approximately 480 kilometres from Queensland's capital city of Brisbane.
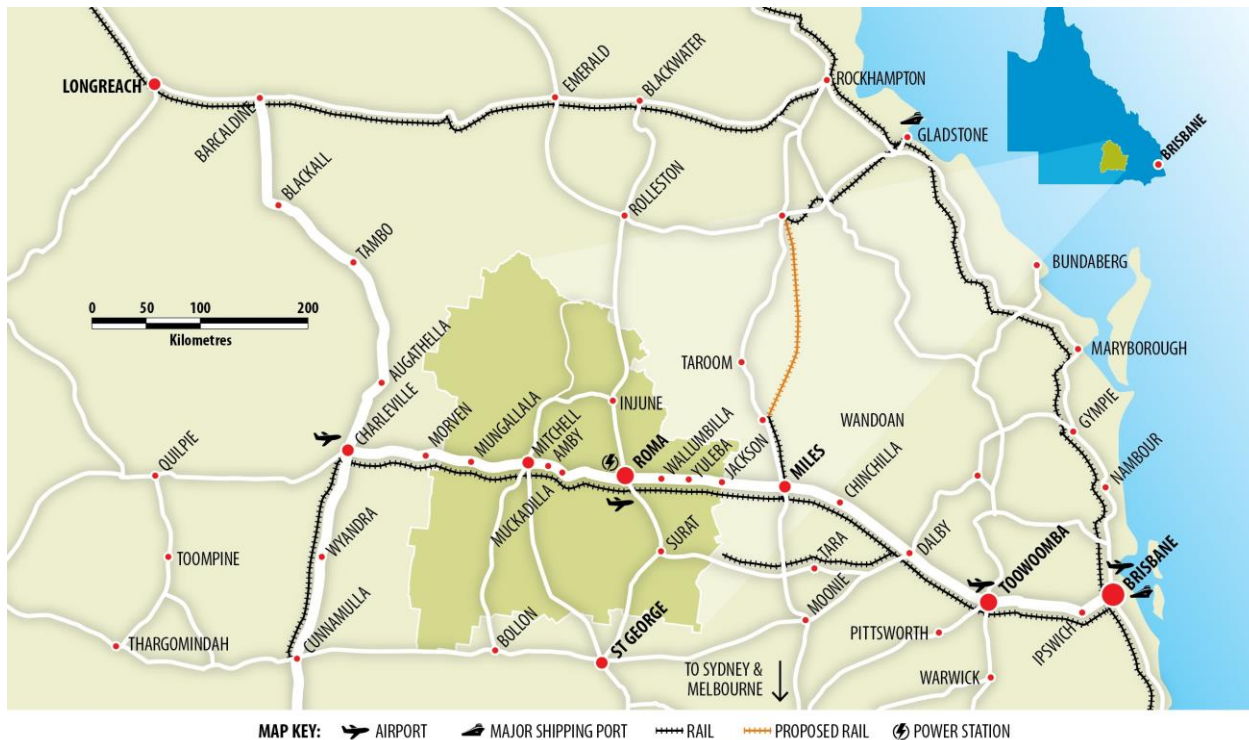
Other small townships in the Maranoa region include Amby, Injune, Jackson, Mitchell, Mungallala, Surat, Wallumbilla, and Yuleba. The remaining Maranoa population residing outside of townships are rurally based, and account for approximately 30% of the region's population. The main Issues that Maranao Regional Council is trying to address are sustainability of our population through liveability enhancements, supporting job creation, and the provision of services for community safety, and lifestyle.

We claim that like all regional Australians, we deserve the same access to services as our urban counterparts. As a percentage of Gross Domestic Product, Regional Australians produce per capita a greater share of contribution than do many of our urban counterparts. Aside from our claim for equity of access to services, as Australian taxpayers generally, we raise the point that without sustainable populations in regional Australia and particularly rural and remote Australia, national agricultural production levels might not be sustainable.

Notwithstanding this claim as a right, we petition that to improve our performance on the global scene, we must capitalise on the opportunities through innovations and automations. Accordingly, the latest technologies must be available to regional Australians.

Maranoa Regional Council has a responsibility to lead the sustainability of its communities, and arguably a significant factor in future population attraction and retention is access to reliable and affordable, business grade telecommunications and internet-based technologies.

Council is pleased to provide input into the Regional Telecommunications Review 2021, in the hope that the information that we provide might assist the Australian Government to frame policies and programs that ensures that using technology, regional Australia has the same social and economic opportunities as urban Australia.

Response:

Adequacy:

The issues paper states that 99.5% of Australia's population and 33% of the Australian landmass mass is serviced by a mobile phone network is questionable, however the potential of the remaining 67% of landmass, which is mostly not serviced by adequate and reliable mobile phone or broadband services is overlooked in the narrative.

The 66% of land mass that is not serviced by adequate broadband or voice services is some of the most productive land for agriculture and mining in the world, and whose populations produces per capita, a far greater proportion of Australia's exports and contribution to gross domestic product, than their city counterparts.   This is the potential of Australia's future economic and lifestyle development.

This is the paradigm shift needed in our thinking about policy and programmes that will ensure equity of access to what has become essential infrastructure associated with broadband, voice, and mobile technology, for future generations.

Regional Telecommunications Review 2021 – Issues Paper – Questions

1.

    a. **What telecommunications services are required in regional Australia to meet current and future needs?**
- Need to have at least 4G mobile services at a reliable standard.
- Residential and commercial access to scalable, unmetered high-speed data (low latency) services, including enterprises that are in remote and rural locations.
- Regional services should mirror those available in major centres.
- A cost effective and widespread IoT (Internet of things) communications network for automation, remote access, and telemetry requirements.

    b. **Are there any things regional communities and businesses need to do, but can't, on their existing services?**

- Most rural enterprises particularly inland and remote sites do not have access to mobile communications, this limits business functions and social interactions.

        o As more applications and services move to cloud-based platforms where upload and download speeds are critical, current systems available are inadequate. For business to be able to ensure a degree of continuity and protection from the growing threats of cyber-attack and ransom ware, offsite backups including site storage (private or public) are critical.

      o Due to technological barriers, business and population migration aspirants are denied the incentive to relocate to a place of their choice to enjoy a regional lifestyle while running a business.

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

   a. Access to high bandwidth telecommunications in regional areas should align with those services in major urban centres irrespective of location, for every Australian. Demand for data management, and automation systems for agricultural enterprises driven by a need to stay competitive is being met through the individual efforts of farm management.

   b. Population growth in some regional centres is on a positive trajectory, which is improving demand for services, however this is not the case for most regional Australian communities. The Australian Government has long term population growth and immigration targets, which must be underpinned by liveable places, if regional Australia is to play a part in this population growth story, then it must have the same services as regional population centres.

   c. Bridging the business viability of existing telecommunications providers who either dominate or compete for a smaller market.

      i. Aggregation of demand for telecommunications particular in smaller regional centres
      ii. Government intervention in leveraging government owned telecommunications infrastructure to enable local telecommunications systems to be developed.

3. **How have the Government's policies and programs affected telecommunications service outcomes in regional, rural, and remote Australia? How can these be improved?**
   a. In the late 1990's Government policies drove the opening of the internet market through such programs as Networking the Nation.
   b. The recent creation of the NBN Co network has provided the infrastructure necessary to achieve total coverage of the Nation in all its remoteness.
   c. Recent focus of NBN Co on regional communities is giving hope and a pathway for future technology solutions to support, Health, Education, Business, Community Safety and Society which supports population growth targets and future generations.

   - **How can these be improved?**
     Many telcos find it unviable to provide affordable services in smaller population centres, and to bridge the gap, Government policies could be improved by enabling such concepts as:
     - Supporting all telcos to bid for Government incentives that will bridge the viability gap e.g., Mobile Black Spots Program for Data Services
     - Community based solutions managed by Not-for-profit or cooperative entities that have benevolent community-based objectives, like Community Broadcasting Licenses.
     - Explore alternative methods of data transfer e.g., available alternative spectrum (Television etc)
     - Enable access to all Commonwealth owned infrastructure, to providers of services who require market entry anywhere. This will enable telecommunications services anywhere in Australia, for community benefit, by multiple providers. Insist that any new infrastructure built (especially with Commonwealth funds) be available to all Telco's.

In the Maranoa Local Government Area, we have very few options for the provision of services. One or two major players in a market can take their time to respond to maintenance and services disruptions and can be less competitive due to an absence of competitors.

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

    a. It is imperative to the success of an enterprise to be available for its customers, whether it be in a shop front or virtual presentation. Reliability of communications by telephone, eftpos systems and back-office data transfer systems need to be reliable.   Any downtime is an inconvenience to a customer especially in remote locations where often the buyer is reliant of transport systems to deliver much needed inputs their business.

    b. Under the COVID19 conditions, workers have had to work from home in ever increasing numbers, this aspect of the workplace is for some enterprises, proving most cost effective and good for business. In more regional and remote areas where telecommunications infrastructure is inadequate, this has not been possible due the absence of reliable connectivity.

    c. In times of Natural Disaster, it is common in regional areas, that power and all telecommunications are lost due to lack of scalable redundancies. This creates a threat to community safety and economic hardship and an inability for businesses to operate.

    d. Retail and services businesses are not considered critical to community sustainability and therefore are often the last to receive assistance to resume trade.

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

Non-Commercial Service Level Agreements (household services) do not provide a guarantee of services for any period. This is largely due to the sometimes inability of service providers to access their infrastructure and reinstate or maintain services, which is usual in times of disaster.

Local Governments or local community contractors could play a role as 1st responders during times of local disasters, by providing timely situation reports and responding to requests for remedial actions that might quickly reinstate services i.e., Refuelling generators, rebooting systems, etc.

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?**

Our efforts to protect Australians from contracting COVID19, largely relies upon the imposition of self-isolations and lock downs of communities. By necessity, this has changed the way that people have approached their employment. Work from home arrangements have provided viable solutions to the isolation issue and enabled employers to continue operating and keep wages and salaries circulating in the economy.

This has only been made efficient through appropriate technologies that support audio visual systems and fast data transfers and volumes.   This change in the way we do business is showing signs of becoming a "new normal" with many Australians "working from home" as a preferred option for employer and employee both. This change in the way we deliver personal services can only be possible for all Australians everywhere, if the digital technologies are available and affordable.

Accordingly, the Nation's leaders must create a framework which supports the creation of provision of and maintenance of systems and technologies

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

Affordable services for all Australians particularly in remote indigenous communities can only be achieved where there is a <u>competitive market</u> with adequate demand and multiple providers competing for the available market. Accordingly, publicly funded telecommunications infrastructure (NBN Co, and other Government subsidised infrastructure) should be made available to all providers (Telcos) on an equal access basis across the Nation.   Legislative controls that promote ethical market behaviour should be put in place to ensure that the base level services are of an adequate minimum standard.

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

Telecommunications is changing the way we live our lives, more applications that do things for us, are emerging and has created a new way of living and doing business. Technological innovations that decrease the need for human labour are commonplace and getting better as the race for efficiency and green living continues.

<u>This is an opportunity that should be available for everyone in Australia</u>, <u>irrespective of location</u>.

In this current business environment technology that enables higher profits, reduces risk, and enhances lifestyle is not available everywhere in Australia. Locations of higher populations where providers are assured of early and high returns on their investment are the priority.

Regional Australians have struggled to attract services from the private sector for reasons that are valid and based on commercial return, and therefore either they are incentivised to provide the infrastructure to make the services available, or the Commonwealth of Australia bridges the gap by continuing to make the investment in regional telecommunications infrastructure.

In regional areas service delivery is also monopolised, often by a single provider, on a wholesale and retail basis which further constrains availability of high bandwidth, reliable, and scalable technology.

We need to defeat this inequity by creating an operating environment that is available to everyone irrespective of social or economic status.   This may require a minimum standard for technology, and through the development approval process, must be present in the development application, Environmental/Social Impact statement before a <u>development of any size</u>, anywhere, can be approved.

Major project development, through to residential or commercial agricultural developments anywhere in Australia and its territories, must be required to contribute to a national grid of technology that everyone can reach on an equitable basis. Accordingly, all policies and programmes aimed at encouraging and enabling investment and or development, must have as part of its key access criteria, a component <u>that measures how the project will add to the growth of the grid</u>. This might require a mixture of:
- a mandatory levy for each approval
- a national telecommunications income tax levy
- a non-competitive fund (like the Future Fund) devoted to bridging the technology gap
- Subsidies for business investment in telecommunications (like the domestic solar program)

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?**

Innovative technological solutions that provide data transfer and voice communications particularly in remote locations are key to providing equity of access at a minimum standard to all Australians.

Technologies that enable business grade access to the opportunities of e-business for those in remote locations, already exists, that are promoted by private provider solutions, e.g., "technology hot spots" on farm enterprises.   The barriers to everyone having a "hot spot" are the financial criteria associated installation. Considerations centre on services providers meeting their return-on-investment levels or the ability for land holders and entrepreneurs to afford the costs of the infrastructure.

Current and future technologies could be subsidised/funded through mechanisms that obligates investors to meet "Minimum Data and Communications Service delivery Standards" for access in Australia, such as those suggested in Question 8 of this submission.

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?

Perhaps the most significant emerging data transmission technology of today is the Starlink solution currently being trialled in Australia. It promises a minimum 50 to 150 MBPS through low latency internet access to all of Australia excluding capital cities, through a network of low earth orbit satellites. Starlink is being promoted as the best solution for non-urban centres compared with terrestrial based services, and based on the USA experience with Starlink, these claims likely will prove true.

Satellite technologies are proven to work well in Regional Australia, albeit with some challenges associated with weather patterns and technological capacity and reliability. This unreliability, no matter the frequency or duration is a serious constraint on business and social critical interaction. Australians in increasing numbers, are using smart phones, internet TV, and automations, etc for a smooth and successful daily life. They rely on uptime internet as a given and any downtime is devastating particularly with business critical and security applications and are justified in seeing satellite technology as 2nd choice over terrestrial solutions.

One should also consider that the risks involved in entrusting the carriage and management of personal and business information, to any one corporation/entity, is of concern. Accordingly, no one privately owned service should be encouraged or supported to dominate any market in Australia, therefore irrespective of who provides or controls the services a commonwealth owned redundancy for satellite technology should be considered

11. How can Government better support the rapid rollout of and investment in new telecommunications solutions in regional areas?
See Question 8.

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

The State and Federal departments associated with communications should work with Local Government to conduct technology audits to determine where the gaps to meeting "Minimum Data and Communications Service Delivery Standards "are, and then scope, design and cost solutions that meet the standards at that site. Investment should follow to provide a permanent irrevocable access to all registered telecommunications providers in Australia under service level agreements that provide redundancy in the event of technology/service failure.

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

Government should, as a matter of policy, promote access to internet and voice technology as a basic right for living in Australia. Accordingly, the provision of technology infrastructure must influence all policies and programmes to incentivise and or impose on investors or telecoms providers to contribute to a national grid.

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?

Regional consumers could be supported in an environment where a "Minimum Data and Communications Service Delivery Standard" exists, by making available the choice to use it or not, in just the same way that is available to urban centres. Under the current "free market" conditions there is limited choice, and the equity balance is weighted away from the consumer.   If a commonly available "enabling" infrastructure in Regional Australia, was available to the 100 plus telecoms providers in Australia then the consumer would be encouraged and assisted by providers to understand and choose the best options for them.

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?

Not all Regional Australia is disadvantaged by distance away from capital centres or represents smaller populations or indeed are isolated. Gladstone, Bendigo, Dubbo are regional centres but have critical mass enough to be attractive to service providers in abundance, enough for all to win a piece of the market.

Compare them to, Injune in SW Queensland or Gloucester in NSW or Lyndhurst in South Australia which is at the southern end of the Strzelecki Track to Moomba and Innamincka. It has a population of 15 permanent residents, supports around 20 outlying cattle stations and a healthy Tourism industry but has limited services to support any prospects of growth, let alone technology services which visitors and businesses in urban Australia take for granted. This is true for most rural and remote communities in Regional Australia. They are encouraged to grow and be sustainable but not empowered to do so.

Due to the poor prospects of financial returns, providers cannot make or continue to maintain a presence in these smaller towns, and accordingly, choice is limited to a monopoly which may not be as responsive as the community needs.

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

Maranoa Regional Council can offer no more advice in addition to our response to questions 1 through 15.

For further information contact Maranoa Regional Council Manager of Economic and Community Development: