



2021 Regional Telecommunications Review

LGAQ - Response to Issues Paper



September 2021



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Contributions

This response to the Regional Telecommunications Review 2021 has been created with feedback from councils, conference motions, video interviews and responses to consultation questions.

The LGAQ has also used regional planning documents supplied by councils and Regional Organisation of Councils (ROCs) to further understand that needs of regional Queenslanders. We would like to thank those councils and ROCs for their contributions and involvement in the consultation process including:

- Aurukun Aboriginal Shire Council
- Balonne Shire Council
- Barcaldine Shire Council
- Boulia Shire Council
- Bundaberg Regional Council
- Carpentaria Shire Council
- Cassowary Coast Council
- Cook Shire Council
- Etheridge Shire Council
- Isaac Regional Council
- Lockhart River Aboriginal Shire Council
- Far North Queensland Regional Organisation of Councils
- Torres Cape Indigenous Council Alliance Inc
- Australian Local Government Association
- Logan City Council
- Longreach Shire Council
- Mackay Regional Council
- Maranoa Regional Council
- Moreton Bay Regional Council
- Palm Island Aboriginal Shire Council
- Toowoomba Regional Council
- Western Downs Regional Council
- Whitsunday Regional Council

About the Local Government Association of Queensland (LGAQ)

The Local Government Association of Queensland (LGAQ) is the peak body for local government in Queensland. It is a not-for-profit association established solely to serve councils and their needs. The LGAQ has been advising, supporting, and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities. The LGAQ does this by connecting councils to people and places; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and providing them with the means to achieve community, professional and political excellence.

Partners in Government Agreement

In August 2019, the LGAQ on behalf of all 77 Queensland local governments signed a three-year partners-in-government-agreement¹ with the State of Queensland.

The Agreement details the key principles underlying the relationship between the State and local governments and establishes the foundation for effective negotiation and engagement between both levels of government.

The agreement acknowledges that local government is the closest level of government to the community, affecting the lives of everyday Queenslanders and acknowledging local government as a genuine partner in the Australian government system.

¹ https://www.dlgrma.qld.gov.au/_data/assets/pdf_file/0016/45115/partners-in-government-agreement-2019.pdf

The intent of the agreement was to continue the tradition of working in genuine partnership to improve the quality of life for all Queenslanders to enjoy. By identifying the roles and responsibilities of each party, it provides a solid foundation for effective negotiation and engagement between both levels of government.

The LGAQ is committed to working with the Queensland Government and will continue to be a passionate advocate for councils, to serve our joint jurisdiction for the people of Queensland.

Rural and Remote Councils Compact

The Rural and Remote Councils Compact² signed on 25 June 2021, compliments the existing Partnership in Government agreement in place between the LGAQ and the Queensland Government to provide a platform to ensure issues of priority for these communities are properly considered by the Government when developing policies, programs, and legislation.

The Rural and Remote Councils Compact pledges to amplify the voice of and improve outcomes for the state's 45 rural and remote councils and their local communities by enhancing engagement between both levels of government. Its key strategic priorities in 2021 are roads, housing and financial sustainability.

² <https://knowledgebaseassets.blob.core.windows.net/images/9c61cdc2-3cfa-eb11-94ef-002248181740/Rural%20and%20Remote%20Councils%20Compact%20-%20signed%20copy.pdf>

2021 Regional Telecommunications Review – Response to Issues Paper

Executive Summary

The LGAQ welcomes the opportunity to provide feedback to the Regional Telecommunications Review 2021.

Digital connectivity is inherent to all facets of everyday life in the modern world. Technology plays a vital part in education, conducting business including invoicing and banking real time health monitoring for in-home care, tracking freight and vehicles, communication, emergency services, public discourse and political representation, advertising, news and recreation – there are literally no corners of our lives that are not enriched by increased connectivity.

With more than 67% of Australians now working from home, and more than double the amount of migration from the cities to regional areas since the start of the COVID19 pandemic, the issues of regional connectivity have never been more important for jobs, economic growth, and the future of regional communities.^{3 4}

The Telecommunications Review 2021 offers a chance for the LGAQ to not only advance established policy and advocacy areas, but also to highlight issues and potential solutions from our member councils that have been offered as part of the consultation process.

The LGAQ hopes that this important review will lead to significant improvements for Queensland communities, where places such as Lockhart River are repeatedly left without phone or internet service for more than a week at a time during the wet season every year, due to poor planning and unreasonable response times for repairs.

The LGAQ believes strongly that the adoption of recommendations from our member councils will lead to increased safety, access to education, engagement with health services, and improved economic opportunities for Queenslanders, in even the most remote areas.

The LGAQ has detailed Advocacy Action Points and established policy as well as themes that have emerged from our consultation, including:

1. The need for digital planning in the regions
2. Town Planning and Mobile Infrastructure
3. Repair times for mobile service outages
4. Mobile Black Spot Program review
5. Roaming and colocation on mobile infrastructure
6. Connectivity in Indigenous communities

³ <https://aifs.gov.au/media-releases/two-thirds-australians-are-working-home>

⁴ <https://www.abc.net.au/news/2021-05-05/qld-coronavirus-internal-migration-melbourne-lockdown-regional/100114442>

7. Reducing the digital divide
8. Creating nationally consistent benchmarks for establishing need and prioritising funding

The LGAQ presents these issues on behalf of member councils and seeks to recommend to the Review several studies and regional planning documents that have been produced by member councils and Regional Organisations of Councils to illustrate the gaps in service and the challenges in regional and remote connectivity. These documents are provided as attachments to this submission.

Recommendations /Priorities for Action

The LGAQ has prepared detailed comments on issues raised in consultation with member councils, as well as in relation to each of the questions outlined in the Issues Paper, and has made 12 recommendations, summarised below:

Recommendation 1: The LGAQ recommends the Federal and State governments support digital planning in regional councils; either through funding, expert advice, or training programs so as to make access to the economic, educational and social benefits of the digital economy achievable for regional and remote Queenslanders.

Recommendation 2: The LGAQ recommends the Mobile Black Spot Program (MBSP) funding application process be adjusted to include provisional sign-off from the appropriate LGAs. Any process of applying for Federal funding for the development of mobile or data infrastructure needs to involve local government, to improve build times, costs, and planning for community growth.

Recommendation 3: The LGAQ recommends that in addition to the Universal Service Guarantee (USG) and Universal Service Obligation, the Australian Communications and Media Authority (ACMA) and Telecommunications providers should commit to an extension of the Customer Service Guarantee to mobile (calls and data) network services, and include a minimum repair time for mobile telephony for remote services.

Recommendation 4: The LGAQ recommends the State and Federal governments coordinate and develop local resources for the deployment or repair of equipment in remote areas to reduce down-time of services in emergencies.

Recommendation 5: The LGAQ recommends the Federal Government prioritises the funding of infrastructure in regional Queensland to enable access to reliable digital services and ensures progress on coverage of non-commercially viable mobile black spots is a priority in regional digital infrastructure program funding.

Recommendation 6: The LGAQ recommends the Federal Government explores alternative models for ICT service provision that were originally suggested for the MBSP to improve public good outcomes and competitiveness in regional areas - with specific focus on investment in Northern Australia and the roll out of future Regional Connectivity Fund grants.

Recommendation 7: The LGAQ recommends the Federal Government legislates to require telecommunication operators to provide access for competitors to their mobile infrastructure in regional areas to enable roaming.

Recommendation 8: The LGAQ recommends the Federal Government examine ways mobile roaming may be trialled in regional areas, and along regional access roadways and highways, to support regional communities and improve safety for tourists travelling in remote areas. Roaming should be accessible at a minimum during crises like floods and bushfires so communities can access local support, information, and family members in times of emergency.

Recommendation 9: The LGAQ recommends both State and Federal governments establish regional ICT infrastructure planning, coordination and partnership committees with Indigenous councils.

Recommendation 10: The LGAQ recommends the digital divide experienced in regional and remote areas be addressed to ensure all Queenslanders have access to telehealth, mental health, education, banking and reasonable data limits to enjoy social benefits and digital inclusion in a modern society.

Recommendation 11: The LGAQ recommends training packages be developed to upskill and assist elderly community members to become technologically literate to be rolled out across all local governments.

Recommendation 12: The LGAQ recommends a national framework for establishing ICT need for communities be developed to benchmark relative need, determine funding priorities and the focus of infrastructure roll out.

Introduction

The LGAQ has worked with both the State and Federal Government to advocate for improved data and telecommunications' infrastructure in rural and remote areas of Queensland. This has become increasingly vital as an enabler of economic development, the delivery of health services, and a means to deliver quality education to families in remote areas.

The effects of unreliable or unaffordable services are felt by residents, schools and businesses across regional Queensland. Mobile telephony and access to the internet are now part of how Australians transact business, access banking, government services, health care, entertainment, news, education, and emergency services. When access to data and mobile services are regularly affected by weather, or the lack of adequate infrastructure, people in regional areas are forced to accept reduced digital connectivity, on top of a sense of further isolation and disconnection from services and family.

The importance of digital connectivity cannot be overstated. The UN General Assembly 2016 passed a non-binding resolution that "declared internet access a human right". It is with this in mind that the LGAQ calls on all levels of government to work together to ensure that digital connectivity is treated as a priority in the development of regional and remote areas in Australia.

Consultation Themes

The LGAQ Advocacy Action Plan 2021 details key areas where action can be taken by both the State and Federal Government to strengthen local government and develop more resilient communities. These advocacy points are primarily drawn from Annual Conference resolutions proposed by, voted on, and endorsed by Queensland's 77 councils.

Advocacy points focussed on access to mobile telephony, data services, and infrastructure, are part of the current LGAQ advocacy strategy and are highlighted throughout the submission.

What we're looking for is a level playing field. It shouldn't matter where you live in Queensland, the opportunities should be the same. Councils are best placed to deliver local works to stimulate local economies. We need government to provide longer-term certainty around grants and boost digital connectivity.

Mayor Jack Dempsey
Bundaberg Regional Council

The LGAQ further engaged with member councils on the Issues Paper released by the Review and took part in the online consultation sessions. Several areas of common concern among member councils emerged with feedback regarding these concerns discussed in depth below. Direct quotes from consultations, video responses, and previous engagement activities are also included throughout this submission.

Multimedia Submission

The LGAQ has also compiled a video from councils as part of the submission to the Review.

These can be accessed here: <https://youtu.be/DFitqDLwuc> and <https://youtu.be/goYWfXAauEs>.

1. Digital Planning

LGAQ 2021 Advocacy Action Points:

- That both State and Federal governments provide additional funding to meaningfully address the digital connectivity issues across the state, particularly regional and rural Queensland.
- That the State and Federal governments collaborate with local government and the private sector to find solutions, including digital connectivity solutions, to ensure the long-term sustainability for the provision of regional news.

Recommendation:

- The LGAQ recommends the Federal and State governments support digital planning in regional councils; either through funding, expert advice, or training programs to make access to the economic, educational and social benefits of the digital economy achievable for regional and remote Queenslanders.

Regional communication in our regional communities is vital for the growth of encouraging investors and people to come and live and create business within our society

Mayor Rick Britton
Boulia Shire Council

Councils need to have plans for information and communication technology (ICT) infrastructure before they can responsibly offer co-funding arrangements to support Mobile Black Spot Program (MBSP) applications by service providers or engage in the Regional Connectivity Program. Some technical advice is available through new initiatives such as the regional tech hubs, however this advice is less suited to larger scale planning.

Before accessing other schemes such as the NBN Co Regional Co-investment Fund, communities should have a clear idea of what they need now and into the future. Councils have also often found themselves unaware of what infrastructure is being developed in their own regions due to a lack of consultation from ICT providers.

Councils need to make informed choices on matters such as who to choose as the provider for community digital infrastructure and services, and what services are likely to be needed.

This is especially important considering the introduction of the statutory infrastructure provider regime and the USG where the provider will have an ongoing relationship with the council and the community.

<https://www.communications.gov.au/what-we-do/internet/telecommunication-reform-package>

Most young people in particular when they are looking for a place of employment want to make sure they have access to good connectivity so they can engage with friends and family and there are many examples of remote locations in the Central West where that is simply not available.

Mayor Tony Rayner
Longreach Regional Council

Increasingly, councils are finding they are not adequately funded to provide the increasing amount of support and services expected by their communities. This issue has grown to the point that Queensland Auditor-General Brendan Worrall found that as of 30 June 2020, 25 of the 77 councils in Queensland are at a high risk of not being financially sustainable at present levels of funding.

It is in this environment that councils are asked to also plan, tender, and purchase digital infrastructure and services for their communities.

As predominantly the source of information on services and likely return on investment is coming from commercial entities, councils are unable to find a reliable “single source of truth” to base any investment decisions on. This is compounded by the fact that councils will not ultimately own the mobile infrastructure they are investing in.

There are many people in the rural sector who are depending more and more on good connectivity. Farming is not what it used to be and good connectivity is critical to efficiency in the rural sector

Mayor Paul Antonio
Toowoomba Regional Council

Councils are asking for support for digital planning that is part strategic planning and part regional planning for the setting of priorities, and roll out of digital connectivity and mobile services projects.

Digital planning is crucial to developing local economies as having robust ICT infrastructure is key to unlocking the potential of regional markets.

Primary industries are becoming increasingly digital, including the monitoring of livestock, water levels, and equipment. Farm-to-table philosophies are being realised through encoding the place of origin and style of production on products through block chain encryption. This can also be used to monitor and re-direct products to markets while enroute. None of these aspects of modern farming are available without connection to world markets and the internet when in the field.

Beef is a world market that needs world class systems

Mayor Rick Britton
Boulia Shire Council

Councils increasingly feel tourism markets will stagnate without the ability to offer visitors access to the internet for road safety and social media for the full tourism experience. Access to reliable ICT is also a factor when potential employees are making decisions to accept work in regional areas, as well as the ability for trainees to access further educational opportunities.

All these triggers of economic growth cannot be accessed without proper planning and investment in regional community infrastructure.

Councils therefore seek assistance to access long term digital planning to help them better align funding and projects with the needs and growth of their communities and regions.

As stated in the Palm Island submission to the Review “*Generally, telecommunications platforms have been built over time as and when the funding becomes available. The build hasn’t focussed on service delivery but the funding available.*”

Assistance with planning, accessing and aligning funding streams, and understanding the processes of developing contemporary community infrastructure will avoid duplication,

increased costs, and increased burden on regions who do not enjoy the same level of access and services of larger metropolitan centres.

With support from the Federal Government, local government could play a role in providing direction for funding that aligns with planning and community growth.

2. Town planning and mobile infrastructure

Recommendation:

- The LGAQ recommends the Mobile Black Spot Program (MBSP) funding application process be adjusted to include provisional sign-off from the appropriate LGAs. Any process of applying for Federal funding for the development of mobile or data infrastructure needs to involve local government, to improve build times, costs, and planning for community growth.

As councils are unable to apply for MBSP funding directly – they are reliant on ICT providers to either approach them for a co-funding arrangement or to be inclusive in planning and development processes. When councils are not part of the financial co-contribution, often they are called on to provide land or other “in-kind” contributions.

As funding becomes available it needs to align to an agreed strategy to ensure the ongoing technology expansion meets the community's growth.

Palm Island review submission

When councils are not the primary point of supply or funding, they can often be left out of the MBSP process until the proponent is at the point of applying for a development application.

This can mean projects can also stall or even be abandoned before councils are involved. As an example, Moreton Bay Regional Council had to intervene when progress had stalled on a MBSP due to the private ICT provider being unable to locate suitable land for a tower. Funding had been announced and public expectation was high regarding improvements to connectivity

Telecommunication is vital to the social and wellbeing of our communities, and allows our business to grow in the global economy

Mayor Rick Britton
Boulia Shire

and services in the region. When the project was at risk of being abandoned council were able to intervene and find suitable land, so the project carried forward and the infrastructure was built. With council involvement at the beginning of the project this would have been a much smoother process and infrastructure would have been available to community members much sooner.

Councils are requesting that any funding for ICT infrastructure includes a preliminary “in-principle” sign off by local government to ensure projects fit with development planning and long-term planning for the region.

3. Repair times for mobile service outages

LGAQ 2021 Advocacy Action Points:

- Ensure NBN communication services incorporate uninterruptable power supply to support emergency management.

Recommendation:

- The LGAQ recommends that in addition to the Universal Service Guarantee (USG) and Universal Service Obligation – The Australian Communications and Media Authority (ACMA) and Telecommunications providers to commit to an extension of the Customer Service Guarantee to apply to mobile (calls and data) network services and include a minimum repair time for mobile telephony for remote services.
- The LGAQ recommends the State and Federal governments coordinate to develop local resources are developed for deployment or repair of equipment in remote areas to reduce down-time of services in emergencies.

The Universal Service Guarantee (USG) updates the long-standing Universal Service Obligation, by providing all Australian homes and businesses with access to both broadband and voice services, regardless of their location. This guarantee does not cover mobile telephony.

Remote Queensland communities often have singular points of connectivity and little continuity of service in emergencies. Where communication is reliant on NBN services – the infrastructure may be intact during an emergency – however power supply can be an issue.

Communities such as Lockhart River in Far North Queensland continue to be repeatedly cut off from phone services and internet access due to power outages at Telstra mobile towers outside of the community.

These outages are happening frequently throughout the year and lasting for upwards of a week at a time. The cut-off often coincides with heavy rain and harsh weather conditions when emergency services are needed.

The prolonged outages mean that without digital connectivity, the local economy simply ceases to function. These isolated communities cannot use ATMs, shops, petrol bowsers or access government services until the repairs take place.

Telstra spokespeople had indicated that the fault happened when *“the site lost power due to a lack of solar energy from the heavy cloud cover in the region.”*⁵ However, given that this is an area that receives on average 2045 mm of rain a year –it is an issue that will not be resolved without an overhaul of infrastructure, rather than deploying a repair team from Cairns.

Areas in southwest Queensland are also relying on copper landlines that are undependable leading to no reliable connection to emergency services during moderate weather events.

Councils are seeking a further extension of CSGs to include mobile coverage. In regional and remote areas, electronic devices that are key for the local economy (ATMS, EFTPOS, fuel

⁵ <https://www.couriermail.com.au/news/cairns/lockhart-river-loses-telstra-service-for-four-days-mayor-calls-for-infrastructure-review/news-story/b675052bc748e1bede57a28bd1dfbf8c?btr=79951a2f0093ccf2156e9f0bab618c82>

pumps, mobile telephones) are much more likely to rely on internal SIM cards to access data and consequently when mobile services are interrupted the community is left on hold.

A benchmark for repair times can be achieved through an audit of service providers and what resources they have that can be readily deployed for repairs in regional/remote areas compared to metropolitan areas. This can be used to establish a baseline for minimum timeframes that should be reasonably expected for community telephony / digital infrastructure.

This minimum repair time guarantee should extend to whatever method (satellite, landline, microwave, wireless broadband) is the primary connection point for a community. There needs to be adequate planning on emergency repairs and infrastructure that has redundancies in place.

Systems reliant on batteries that will provide coverage for a matter of hours when repair times are likely to be days or weeks are clearly not adequate, and simply add to the burden and isolation felt by community members.

It is hoped that a minimum guarantee of response times will provide an impetus for better planning and quicker response times for remote areas.

This may also provide an environment where local resources can be developed for repair work or regional assets. Employment and training programs can be developed in remote areas for local community members to be part of the repair or deploying of equipment as part of disaster recovery.

When the local shop's EFTPOS terminal has an unreliable connection, when an arrival at the Airport can't make a call or the local critical infrastructure doesn't have connectivity for operation and control, confidence to invest economically or socially is diminished.

Palm Island review submission

4. Mobile Black Spot Program (MBSP) Review

LGAQ 2021 Advocacy Action Point:

- Fast track reliable digital connectivity throughout regional Queensland and ensure non-commercially viable black spots are addressed as a fundamental rights issue.

Recommendation:

- The LGAQ recommends the Federal Government prioritises the funding of infrastructure in regional Queensland to enable access to reliable digital services. The government needs to ensure progress on coverage of non-commercially viable mobile black spots as a priority in regional digital infrastructure program funding.
- The LGAQ recommends the Federal Government explores alternative models for ICT service provision that were originally suggested for the MBSP to improve public good outcomes and competitiveness in regional areas - with specific focus on investment in Northern Australia and the roll out of future Regional Connectivity Fund grants.

Since 2014 the MBSP has successfully delivered real results for mobile coverage in regional Australia.

The program has delivered more than 1,200 new base stations across Australia.

The program is based on co-contributions from mobile network operators, businesses, and State and Local Governments.

The program has now been linked with the Regional Connectivity Program to deliver mobile infrastructure to Northern Australian communities.

The LGAQ has lobbied the State Government to support Queensland communities impacted by digital connectivity gaps with more than 3,000 community identified mobile black spot areas on the National Black Spot map. The LGAQ urges the Federal and State governments to move beyond co-funding models for infrastructure and lead the direction of infrastructure projects and connect the “patchwork quilt” of mobile coverage across regional and remote Queensland.

The most recent Queensland State Budget contained \$12.5 M in funding towards the MBSP, but no allocation to specific locations was provided.

The co-funding model of the MBSP has made areas that would not have provided a commercial return on investment, viable for mobile service providers through subsidised infrastructure.

...an environment exists where the motivation for the platform supplier is a financial return, and for the funding supplier improved community inclusion.

Palm Island review submission

However, after seven years (2014-2021), there is a need for other approaches to the delivery of mobile infrastructure, as areas likely to provide a reasonable return on investment for carriers with councils financially able to invest in mobile infrastructure are harder to find.

The challenge is to find new ways to partner with three privately owned carriers to reduce black spot coverage. A second challenge is having existing sites upgraded and coverage expanded with current generation technology.

Far North Queensland Regional Organisation of Councils

Remote area councils in need of better coverage, capacity, and quality of their mobile service are increasingly unlikely or unable to allocate funding to these infrastructure projects or have the resources to divert into developing funding applications or digital planning for the community.

Councils ask that priority be given to infrastructure projects that may not fit the established model of co-funding as they are not likely to have a ready return on investment but provide significant community benefit through increased connectivity in rural and remote areas.

At the inception of the MBSP other models were suggested that may now present solutions for ongoing connectivity and upkeep. At the beginning of what is now known as the MBSP, the “Mobile Coverage Programme – Discussions Paper” (2013) suggested other delivery options for the program that there may now be merit in exploring.

Delivery option 3 involved Mobile Network Operators (MNO) as a client of infrastructure rather than the owner – “Network infrastructure provider to co-ordinate implementation” suggested that there was scope for infrastructure (base stations and backhaul) to be built owned and operated to then lease access to MNOs to install their own network equipment on.

This concept was earmarked as “likely to maximise competition benefits as it is in the interests of the network infrastructure provider to have as many MNOs operating on the infrastructure as possible.”

(https://www.communications.gov.au/file/3215/download?token=0_Yw3VEG)

Local governments are not resourced in either funds or expertise. Service providers are not likely to put forward a project which is not economically viable to them over the long term.

Far North Queensland Regional Organisation of Councils

Remote councils believe that this model may be the solution to making remote areas in northern Australia viable for multiple carriers, as well as making infrastructure cheaper overall as it reduces duplication.

This model is supported in-principle by bodies such as the Torres Cape Indigenous Council Alliance (TCICA) who in its recent publication

“TCICA Regional Telecommunications

and Digital Connectivity Final Report 2021” stated: *“The business provision models of telecommunication providers are geared toward maximum returns on investment the geographic vastness and small dispersed populations in the TCICA region provide significant challenges for conventional business models of telecommunication infrastructure and service delivery”*. This is echoed in the submission to the Review from the Palm Island Aboriginal Shire Council which suggests an Indigenous Telecommunication Retail service may also be worthwhile.

The Australian Communications Consumer Action Network (ACCAN) Remote Indigenous Communications Review 2020 also suggested that an Indigenous-owned third-party provider of ICT and services could be established to focus on these issues when identifying gaps in services to communities.

Remote councils are asking for the Review to consider this model as a way of delivering infrastructure in remote areas.

5. Roaming and co-location on mobile Infrastructure

LGAQ 2021 Advocacy Action Point:

- Legislate to require telecommunication operators to provide competitors access to their mobile infrastructure in regional areas to enable roaming.

Recommendation:

- The LGAQ recommends the Federal Government legislates to require telecommunication operators to provide access for competitors to their mobile infrastructure in regional areas to enable roaming.
- The LGAQ recommends the Federal Government examines ways mobile roaming may be trialled in regional areas, and along regional access roadways and highways to support regional communities and improve safety of tourists travelling in remote areas. Roaming should be accessible at a minimum during crises like flood and bushfires so communities can access local supports, information, and families in times of emergency.

As the effects of COVID have limited holiday destination choices, increasingly drive tourism has become a more popular option – the safety aspects of having a single choice of mobile provider in regional and remote areas, particularly on highways in remote areas, is more of an issue than ever before.

This is also true in times of natural disaster such as floods or bushfires where people may be cut off from mobile services that align with a specific carrier and need to establish communication with family and supports. The Royal Commission into National Natural Disaster Arrangements Report tabled in October 2020 echoed these concerns and recommended (recommendation 6.4) “...that states and territories should update and implement plans to achieve interoperable communication for emergency services.” As well as stating “... (for) national resource sharing to occur efficiently and effectively, the people, equipment and systems used across the country need to be interoperable.”

On 23 October 2017, the ACCC released a final report for the mobile roaming declaration inquiry. The ACCC decided not to declare a mobile roaming service as it is not satisfied that declaration would promote the long-term interests of end-users.

Competition is key to achieving affordability goals.

Palm Island review submission

As the ACCC report stated: “We found that declaration is more likely to distort the competitive dynamics in the mobiles market by reducing mobile networks operators’ incentives to improve network coverage or differentiate their products”.

Mobile roaming is an issue that remains relevant to Queenslanders who have limited consumer choice for their day-to-day mobile services. Of the last seven Annual General Meetings of the LGAQ, pursuing mobile roaming has been successfully raised by councils as a conference motion at six of them.

The decision by the ACCC that “*mobile roaming would distort competitive dynamics in the mobiles market*”

(https://www.accc.gov.au/system/files/Mobile%20roaming%20declaration%20inquiry%20final%20report_0.pdf) appears to have been based on a model of mobile roaming being declared everywhere and permanently. As the “competitive dynamics” have not been presented in any real sense as far as consumer choice for many regional Queenslanders, councils ask that other options be explored to open up markets and allow time for mobile carriers to explore the viability of regional markets.

Councils are requesting the decision to not declare mobile roaming be re-examined, with other models for roaming explored (such as roaming declared for a time-bound period, roaming in regional areas only, roaming available in time of environmental crisis) that may be successful in opening up regional markets for carriers and increase consumer choice for communities.

Research time could also be given to why there is a lack of reasonable consumer choices for regional customers, and how MBSP funding and MBSP infrastructure could be leveraged to better support co-location. Though the guidelines for MBSP funding encourage colocation and infrastructure is available to competitors – it is clear that it has failed to eventuate meaningfully in regional areas.

Future funding for MBSP and regional investment needs to seek solutions to issues such as availability of space on towers, and the need for regulated costs for backhaul to the nearest point of presence for the second carrier – rather than simply to the nearest exchange, with a view to establishing a competitive market – rather than simply maintaining the existing market forces.

It can be really challenging for tourists if they have a breakdown or a problem in our remote network. Often it means sitting beside the road until somebody else pulls up to offer assistance and transferring them into an area where they can get assistance... It can be very scary for travellers that come from urban areas that aren't experienced travelling a couple of hundred kilometres without a mobile network.

Mayor Samantha O'Toole
Balonne Shire Council

6. Connectivity in Indigenous Communities:

LGAQ 2021 Advocacy Action Point:

- Provide funding to ensure remote and discrete First Nation communities have the digital connectivity necessary to provide the same level of services available to other communities across Australia.
- Fully implement recommendations of the Rural Telecommunications Independent Review Committee Report benefitting rural and First Nations councils.

Recommendation:

- The LGAQ recommends both the State and Federal governments establish regional ICT infrastructure planning, coordination and partnership committees with Indigenous councils.

Increasingly feedback illustrates digital services are unaffordable and unreliable in Queensland's Indigenous communities.

The Far North Queensland Region Organisation of Councils (FNQROC) has developed its own submission to the Review, where it points to the Socio-Economic Indexes for Areas (SEIFA) that rank areas in Australia according to relative socio-economic advantage and disadvantage as an indicator of the where affordability and accessibility issues that affect access to mobile services are likely to be present.

The irony of not being able to send a video to put an exclamation mark on the comms ills of our community cannot escape me.

David Clarke CEO
Lockhart River Aboriginal Shire Council

This data can be overlaid with the Australian Digital Inclusion Index (ADII) rating the access, affordability, and digital ability of Australian communities to give strong indications as to where targeted government intervention is needed, with Queensland Indigenous communities ranked at (48.8) indicating some of the most significant barriers to accessing digital services in Australia.

Regional planning and a holistic approach are recommended, as well as targeted consultation with councils directly rather than relying on submissions for co-funded projects with commercial entities.

Currently many of Queensland's Regional Organisations of Councils are developing their own resources for collectivised planning and ultimately coordinated efforts to maximise the value of infrastructure in their regions.

Of note is the Torres Cape Indigenous Council Alliance (TCICA) Regional Telecommunications and Digital Connectivity Final Report 2021, which benchmarked the current levels of service and connectivity and developed six strategic focus areas for infrastructure and there are priority areas for government funding.

Recommendations of the report included:

- Establish a TCICA region ICT infrastructure planning, coordination and partnership committee.
- Explore the option for alternative ICT provision to improve public good outcomes and competitiveness.

These recommendations echo the needs of other similar ROCs looking to establish more robust infrastructure and services aligning with the needs of Indigenous communities.

A selection of reviews and discussion papers that highlight the relative needs and suggestions for next steps with regards to connectivity and digital advocacy in Indigenous communities are attached as links at the [end of this submission](#).

We basically, like most communities, are basically asking for the level of service that everywhere throughout Australia has.

Mayor Mislam Sam
Palm Island Aboriginal Shire Council

7. Reducing the “Digital Divide”

LGAQ 2021 Advocacy Action Points:

- Allocate \$1 million to develop a digital training and upskilling program for older workers and provide \$500,000 per year for three years to roll out training across all local governments.

Recommendations:

The LGAQ recommends the digital divide experienced in regional and remote areas is addressed through:

- adequate funding for community-wide education programs to increase uptake of internet services in remote communities
- access to reliable and affordable internet service providers
- robust infrastructure that with system redundancies to support continued access to broadband internet to remote areas during seasonal weather and landline disruption
- ensuring that there are community accessible facilities that can provide internet access in every community, such as libraries and Indigenous Knowledge Centres

to ensure all Queenslanders have Access to tele-health, mental health, education, banking and reasonable data limits to enjoy social benefits and digital inclusion in a modern society.

- The LGAQ recommends training packages be developed to upskill and assist elderly community members to become technologically literate to be rolled out across all local governments.

The Australian Digital Inclusion Index (ADII) rates the access, affordability, and digital ability of Australian communities presented as a score (0-100). This is not just the availability of high-speed internet – but people’s agency to use it – equipment, and training and experience on how to engage in an increasingly digital world.

Older Australians, low-income households, and remote communities continue to be rated lower in their use of available resources and services obtained via the internet, with Northwest Qld (52.6) and Queensland Indigenous communities (48.8) being ranked as having some of the most significant barriers to accessing digital services in Australia.

In the ADII Queensland also scores lower than other states on digital affordability, which disproportionately impacts low-income communities and their ability to access government services, education, health, job listings and news.

Our 2.6G coms are one of our Council’s biggest business risks with an increasing necessity to report via portal the micro-wave link technology currently servicing our community is both problematic and unreliable.

David Clarke CEO
Lockhart River Aboriginal Shire Council

Inclusion programs need to be tailored deliver in rural and remote settings, with focus on low-income families, and elderly Australians. This is especially true for Indigenous communities as the complications of unreliable access to the internet and inadequate equipment means that community members are unable to engage easily with the digital economy or receive the benefits of digital learning. Continued funding and development of Indigenous Knowledge Centres may increase accessibility and opportunities for increased participation.

Digital literacy is a life-long process. Without the agency to engage with the digital world older Australians are at risk from being left out of industries that are moving towards automation, and low-income families without access to the internet and a home computer may not have the digital literacy needed for modern job markets and educational opportunities.

Increasingly regional print newspapers have also been discontinued, limiting regional communities' ability to access news, employment opportunities, information on government services, and participate politically through news and current affairs providers.

Training centres and places to access technology are more important in regional areas than ever before, with the job market changing due to automation and increased use of the "internet of things" for agriculture and primary industries, the ability of regional people to re/upskill will be vital to keeping local economies moving.

Older working community members need to be engaged in the digital economy, and without specific focussed training, upskilling and engagement we run the risk of having a significant part of the workforce no longer able to be part of the emerging economies and job markets.

Councils request funding streams be directed at the community needs holistically, and how digital inclusion can be fostered through coordinated use of government funding (Regional Connectivity Program and Closing the Gap target funding and the Indigenous Digital Inclusion Plan) with set targets for inclusion.

Programs to include:

- increase uptake of internet services in remote communities
- develop reliable and affordable internet service providers
- create robust infrastructure that withstand system redundancies
- develop community education on tele health and other on-line social services
- maintain community accessible facilities that can provide internet access in every community, such as libraries and Indigenous Knowledge Centres;

With set targets and coordinated approaches for communities most at risk, barriers for digital inclusiveness can be addressed directly.

Were taking that progressive stance and ensuring that everyone working all different agencies and businesses that they have a platform where they can bring about real change in our community, without that level of service we'll be continually going round and round.

Mayor Mislam Sam
Palm Island Aboriginal Shire

8. Creating nationally consistent benchmarks for establishing need for and prioritising funding.

LGAQ 2021 Advocacy Action Points:

- Acknowledge that regional inequality still exists and commit to a consistent policy approach through all agencies to address this inequality in line with the Senate Committee Report into Regional Inequality delivered in December 2020.

Recommendations:

- The LGAQ recommends a national framework for establishing ICT need for communities is developed to benchmark relative need, determine funding priorities and the focus of infrastructure roll out.

Increasingly Queensland councils and Regional Organisations of Councils (ROCs) are developing their own regional plans for the future of their ICT services.

Some examples are:

- Palm Island Aboriginal Shire Council “Digital Resilience Plan”
- WQAC are progressing work and developing a “Digital Connectivity Blueprint” for their region
- TCICA “Regional Telecommunications and Digital Connectivity Final report”
- FNQROC – “Solutions for Improved Digital connectivity in FNQ: Building community and disaster resilience in the Northern Gulf”

These plans are typically developed by consultants or universities that benchmark existing service provisions, where there is a lack of service, and detail action plans for future development.

This level of planning is costly and at the end of the process councils are still left with the issues of:

- negotiating with ICT providers
- allocating resources to new infrastructure
- the ability to locate, navigate and apply for funding through State and Federal government grants processes.

Often these planning processes will establish the relative need in regional and remote area through a benchmarking exercise – but often in a way that is inconsistent with grant providers, state and federal policy, closing the gap targets and methodologies used in planning processes neighbouring regions.

Councils have called for a nationally consistent method of establishing the levels of ICT service and relative need of the community to have a “level playing field” for remote areas and councils that are not large enough to have dedicated staff working on grants submissions.

Councils are requesting a simple method to establish a matrix to compare ICT services and access.

For us to do an audit of 5,100 km of road it was \$90,000, which is a small price to pay for a telco, but a large one for councils with low rate bases.

Far North Queensland Regional Organisation of Councils

A consistent way to compare:

- mobile service: reliability, quality, reach and repair times for when the service is interrupted, and number of providers available.
- data services: reliability, speed, down time, repair time, and affordability relative to the community.

The SEIFA index and ADII should also factor into establishing common priority areas that align with the Federal Closing the Gap targets.

With a commonly understood framework, funding for infrastructure projects could be prioritised and allocated rather than competitive tendering and co-funding methods that leave the most vulnerable communities behind.

Conclusion

As Queensland moves forward with integrating the effects of COVID19 into our daily lives, we have never been more reliant on the internet to access news, telecommute to offices while working from home, and provide alternative methods of providing education, entertainment, and social connectivity.

More than double the number of people have moved to regional areas in 2020 compared to 2019, and the statistics indicate that a large percentage of these people are hoping to continue to work from home and rely on digital connectivity for their employment.⁶

As such, councils are working more than ever to provide reliable connectivity to ensure their communities are part of the digital economy, to create new jobs and secure the influx of new residents.

Overall, the LGAQ is supportive of any Federal Government program that increases connectivity in regional and remote areas and fosters the development of a new regional digital workforce.⁷

Ultimately, however, program need to be refined to have service outcomes rather than simple building outcomes. With years of successful co-funding of MBSP and the addition of the Regional Connectivity Fund, the LGAQ joins our more remote area councils in highlighting the need for a review of current funding methods with a focus on increased connectivity for regional areas rather than on co-funding of projects.

The LGAQ puts forward the recommendations in this submission in the firm belief that they will foster regional economic growth and jobs, deliver increased safety in remote areas, and promote real results in achieving Closing the Gap targets. The LGAQ recommends continued engagement with councils to further develop new approaches to regional connectivity projects and to coordinate programs across all levels of government to maximise outcomes.

Digital infrastructure planning and funding done in partnership with local government means better infrastructure outcomes, value for money and the ability to meet the needs of growing communities.

Contact Details

Please do not hesitate to contact Simon Booth Lead –Infrastructure, Policy and Regional Communities via email simon_booth@lgaq.asn.au or phone 1300 542 700 should you wish to discuss any aspect of this submission.

⁶ <https://www.abc.net.au/news/2021-05-05/qld-coronavirus-internal-migration-melbourne-lockdown-regional/100114442>

⁷ <https://www.abc.net.au/triplej/programs/hack/coronavirus-covid-19-moving-to-the-country-working-from-home/12274084>

Appendix

LGAQ Policy Statement

The LGAQ Policy Statement⁸ is a definitive statement of the collective voice of local government in Queensland. The relevant policy positions of local government in the context of telecommunications and digital connectivity are as follows:

6. Planning and Development

6.1 Strategic Land Use Planning

6.1.7 Telecommunications

6.1.7.1 Local government acknowledges the fundamental role played by 'telecommunications' infrastructure as an enabler of economic development and in the provision of health and education services in rural and remote areas of Queensland.

6.1.7.2 Local government supports efficient planning assessment and installation of telecommunications infrastructure and is the appropriate sphere of government to determine the level of assessment to be applied to telecommunications facilities.

6.1.7.3 Local government supports co-location of telecommunications infrastructure and information sharing amongst the development industry, telecommunications providers and local government in order to minimise disruption to local communities and to maximise efficiencies.

8 Infrastructure, Economics and Regional Development

8.4 Communication

8.4.1 Service Access

8.4.1.1 Advances in technology should be applied to give remote areas access to telephone, television and internet services consistent with those available in urban areas.

8.4.1.2 Local government across Queensland experiences significant inequities in mobile phone coverage between rural and urban communities. Local government will engage the State and Federal governments to address this inequity.

8.4.1.3 Local government supports the concept of a system of uniform telephone charges throughout Australia to reduce the disparity of remote locations.

8.8 Economic Development

8.8.7 Local government supports the rollout of digital infrastructure, including the National Broadband Network and the provision of equitable access to high-speed broadband internet. This includes support from Federal and State governments in developing the digital economy and online service delivery for local government.

⁸ <https://www.lgaq.asn.au/downloads/file/183/2019-lgaq-policy-statement>

8.9 Regional Development

8.9.5 Digital infrastructure and technology are recognised as enablers to help overcome the barriers of remoteness, infrastructure shortfalls, attract regional investment and facilitate regional prosperity.

LGAQ Advocacy Action Plan/ Annual Conference Resolutions

The LGAQ is committed to member driven advocacy and working with members to build stronger local government and more resilient local communities.

The LGAQ's Advocacy Action Plan (AAP)⁹ is a roadmap designed to highlight the top policy positions and funding priorities councils believe are critical to ensuring Queensland flourishes and our communities thrive.

Relevant Advocacy Action items mentioned in this submission are:

Federal Government:

AAP 06 - Legislate to require telecommunication operators to provide competitors access to their mobile infrastructure in regional areas to enable roaming.

AAP 07 - Fully implement recommendations of the Rural Telecommunications Independent Review Committee Report benefitting rural and First Nations councils.

AAP 14 - Acknowledge that regional inequality still exists and commit to a consistent policy approach through all agencies to address this inequality in line with the Senate Committee Report into Regional Inequality delivered in December 2020.

State Government:

AAP 15 - Fast track reliable digital connectivity throughout regional Queensland and ensure non-commercially viable black spots are addressed as a fundamental rights issue.

AAP 122 - Allocate \$1 million to develop a digital training and upskilling program for older workers and provide \$500,000 per year for three years to roll out training across all local governments.

Both Levels of Government:

AAP 23 - Provide additional funding to meaningfully address the digital connectivity issues across the state, particularly regional and rural Queensland.

AAP 24 - Collaborate with local government and the private sector to find solutions, including digital connectivity solutions, to ensure the long-term sustainability for the provision of regional news.

AAP 93 - Provide funding to ensure remote and discrete First Nation communities have the digital connectivity necessary to provide the same level of services available to other communities across Australia.

⁹ <https://www.lgaq.asn.au/downloads/file/383/advocacy-action-plan-2021>

Attachments

Regional Planning and Studies by member Councils and ROCs:

James Cook University partnered with Northern Gulf Resource Management Group

Connectivity and digital inclusion in Far North Queensland's agricultural communities: Policy-focused report

This policy-focused report is the culmination of a qualitative study of digital connectivity and telecommunications in rural Far North Queensland (FNQ)

<https://apo.org.au/sites/default/files/resource-files/2019-08/apo-nid253896.pdf>

Australian Communications Consumer Action Network (ACCAN)

Remote Indigenous Communications Review 2020: Telecommunications Programs and Current Needs for Remote Indigenous Communities

In June 2020, the Australian Communications Consumer Action Network (ACCAN) commissioned Dr Daniel Featherstone to undertake a review of programs that support telecommunications and internet access in Remote Indigenous Communities (RICs), and any gaps or outstanding needs identified by community stakeholders.

<https://accan.org.au/our-work/research/1821-remote-indigenous-communications-review-telecommunications-programs-and-current-needs-for-remote-indigenous-communities>

Discussion paper Communications – a key element of Closing the Gap

First Nations Media Australia

June 2019 Discussion paper: Communications – a key element of Closing the Gap

First Nations Media Australia is the national peak body for First Nations media and communications. This paper provides background information to support First Nations Media Australia's position that 'Communications' should be included as a target area within a renewed Closing the Gap Framework for 2019-2029 to address a number of significant structural barriers to Closing the Gap

<https://firstnationsmedia.org.au/sites/default/files/files/Submissions/Communications%20%26%20Closing%20the%20Gap.pdf>

The Torres Cape Indigenous Council Alliance (TCICA)

TCICA Region Telecommunications and Digital Connectivity Final Report 2021

<https://tcica.com.au/wp-content/uploads/2021/08/tcica-digital-connectivity-strategy.pdf>

Far North Queensland Regional Organisation of Councils

Solutions for Improved Digital connectivity in FNQ: Building community and disaster resilience in the Northern Gulf

This plan is due for release soon - <https://www.fnqroc.qld.gov.au/>

In a cohesive and resilient response, this project has supported the Northern Gulf to bring together property owners, councils, communities, development organisations, businesses owners, technical experts, and telecommunications service providers to collaboratively identify and define mobile and broadband challenges during the 2019 event and the recovery phase. Funded under the Queensland Governments' FNQ and NQ Monsoon Trough (Category C Flexible Funding) Grants Program, the aim of the project has been to develop legitimate,

practical, and affordable options for individuals, businesses, and organisations to get connected, and pathways to developing greater digital capability to respond to challenges and to capitalise on opportunities in the future.

Taken together, the qualitative and quantitative research identified and grouped types of needs (at individual, family, and community level) and responses (ranging from quick wins to long-term propositions) for consideration in proposing solutions. A comprehensive assessment of the needs and responses can be found in the Needs Analysis and Technical Audit reports that accompany this strategy document.

Palm Island Aboriginal Shire Council

“Digital Resilience Plan” – available on request

Western Queensland Alliance of Councils are progressing work and developing a “Digital Connectivity Blueprint” for their region that should be completed soon/