Hawkesbury City Council Submission to 2021 Regional Communications Review.

Hawkesbury City Council welcomes the invitation to make commentary on the Issues Paper.

As a Peri–Urban council the area confronts the same geographic issues that areas more distant from capital cities experience. This is compounded by the high risk of natural disasters, including flood and fire and the increasing population in our more remote areas.

Against this backdrop Council and the community it represents is increasingly concerned that there is a lack of coordination between government, telco providers and the community which is the ultimate customer in providing contemporary service levels of communication that are enjoyed by the the more urban areas of our nation.

Specific responses to the Issues paper are as follows:

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

There are significant deficiencies in the provision of mobile communications to the more distant areas of the northern and western parts of the council area with attendant impacts on not only mobile phone communications and the day to day connectivity of those communities. This deficiency is also impacting on potential economic productivity and growth with remote working being limited by speeds as well as the deficiencies in coverage. Concerns would be raised if solutions proposed do not future proof against the need and opportunities that may not yet be recognized by users.

A indicated in the issues paper, the IoT is likely to have profound changes on many current and future services and this must be considered at the regulatory level and not left to the telco providers alone.

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

As outlined in the previous response, demand for data and connectivity is likely to increase and if the usage type for rural areas develops differently from that of more urban centres, it is essential that the technical solutions being envisaged now are capable of being adapted if necessary to meet and future proof against changed needs that emerge.

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

The key issues arising from government policy appears to be a somewhat fractured response when viewed through both a council and a consumer's lens. There are multiple programs and grants being announced with complex conditions and responsibilities and eligibility. By way of example NBN Regional Co-Investment funding appears to shift the commercial risk from NBN to local and state governments, whilst seeking to retain the commercial return for NBN. This downward cost shift could be more appropriately addressed through regulation or enhanced service obligation, or by subsidy at an Australian Government level.

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

This is a key impact on the Hawkesbury region. Communications is affected by terrain, location and power, particularly in emergencies such as the Black Summer fires or the March 2021 flooding of the Hawkesbury- Nepean catchment. Council and the community have been seeking not only expanded reliable coverage (sat phones are not a reliable substitute for permanent infrastructure) but also for hardening/greater resilience of existing installations. In particular power supply/ battery backup and maintenance of those systems should be a part of the Telco/operators obligation.

In bushfire and flooding situations it is no exaggeration to say that reliability and coverage are matters of life and death.

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

As indicated in the previous answer power supply and its maintenance is crucial to this. At a more basic level there are situations where cabling is not maintained adequately in rural areas, with many examples of cables attached to trees, or laying on the ground for long periods of time. Where communities still rely on cabling, these are subject to the risks of fire. There is also potentially a need for an integrated approach for resilience in power supply at a broader whole of government and agency level.

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?

It is difficult for Council to comment on this issue without data, other than to say that the level of complaint and request for lobbying for enhanced service has increased during this period, as there is a growing frustration with speeds and coverage.

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

Council is unable to fully respond to the issue of specific needs and barriers of remote Indigenous communities, however it essential that even in urban areas that the issue of affordability and equity is addressed in all policy and regulatory settings to ensure that no entrenchment of disadvantage is allowed to continue

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

There are significant future benefits for coordinated Australian Government investment and subsidy where appropriate to ensure that future economic benefits are realized whilst appreciating the need to allow market forces and competition to drive the actual delivery. As indicated earlier this should be seen as a co-investment by the federal realm rather than a cost shift opportunity to local government.

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?

Nil comment

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?

Whilst this is outside of Council's core expertise, the regulatory and support environment to manage new technologies must ensure that there is a socially equitable rollout of any new technology and that more financially lucrative works are not done at the exclusion of other areas.

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

The role of Government should ideally be to identify and marry the technology and community needs through an appropriate regulatory environment and where this proves,if national economic or sustainability benefits accrue, should be considered

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

From Council's perspective there is a need for the relevant Australian Government agencies, to brroker genuine dialogue with Telco operators and take on board the community input that is often gathered by local government. Council's role should be one of supporting its community to ensure that regulatory agencies have policy settings that ensure the operators plan for and provide services.

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

As outlined in earlier responses there needs to be an understanding of the role and the limited capacity of local government to influence nationally regulated infrastructure. Clear and unequivocal statements to guide policy, grant and program settings is required, rather than multiple complex programs.

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?

Simple and clear provider agnostic information could be developed along side regulatory frameworks to guide consumers. The involvement of ACCC in this may prove helpful in regard to communication of consumer rights and comparison processes

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?

Nil Comment

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