



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

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 Secretariat

2021 Regional Telecommunications Review

We welcome the 2021 Regional Telecommunications review as reliable and quality telecommunications services is essential for small businesses in rural and regional Australia. The COVID-19 pandemic resulted in a significant move to digitisation, with an estimated 85% increase in the value of small business sales being derived through online platforms¹. This digitisation shift highlights the importance of reliable, accessible and affordable telecommunication services. However, we have worked with small businesses who struggle to access telecommunication services, and as a result experience difficult business conditions often leading to reduced revenue and cashflow. As such, we offer the following comments:

- 1. We recommend expanding the Regional Tech Hub service to include additional education, call centre and advisory services.** The Regional Tech Hub offers small businesses a one-stop-shop for information on how to connect, stay connected and improve connections to telecommunication services. It can be difficult for small businesses to identify and resolve their own telecommunication problems without expert knowledge of telecommunications technology. To help small businesses with resolving their telecommunication issues and improve their digital literacy, the Regional Tech Hub should be expanded to provide small businesses with additional educational, advisory and call centre services.
- 2. We support ongoing funding of programs that improve the accessibility, affordability and reliability of telecommunication services in rural and regional Australia.** The Mobile Black Spot program, Regional Connectivity program and State and Territory co-investment programs have been vital to ensuring that rural and remote small businesses have access to quality telecommunication services. It is important that these programs continue to improve telecommunication services in Australia.
- 3. The committee should consider ways to improve infrastructure sharing between telecommunication service providers, especially in the Mobile Black Spot Program.** The Mobile Black Spot Program has supported telecommunication providers in building cell towers in regional and rural Australia, and therefore ensuring small businesses can access reliable mobile services. However, most grants issued in the program are won by a singular communication service provider²,

¹ Deloitte. *ACS Australia's Digital Pulse 2021*, Published: June 2021

² Department of Infrastructure, Transport, Regional Development and Communication. *Digital Black Spot Program*. Accessed: September 2021.

therefore limiting the choice of mobile plans in regional and rural Australia. We recommend that the committee consider a framework that allows for more infrastructure sharing between telecommunication providers, or potentially funding shared assets to allow for better competition of telecommunication products in rural and regional Australia.

4. **The National Broadband Network Company (NBN Co) should implement service commitments with telecommunications companies to ensure that there is clear accountability when connectivity issues arise.** When signing up to telecommunication products small businesses should be able to expect they will receive the advertised speeds and a reliable service. However, when there are issues with the quality of telecommunication services, the lack of clear accountability between NBN Co and telecommunications companies is confusing for small businesses who need to quickly resolve connectivity issues. A service commitment between the NBN Co and telecommunication providers would clarify the expected quality of service and responsibilities when issues arise.
5. **We support telecommunication resilience programs to ensure that small businesses and their communities can quickly access telecommunications services after natural disasters.** Programs that improve temporary and portable telecommunications infrastructure provide small businesses with rapid access to telecommunications services in the aftermath of natural disasters. These programs are key to ensuring that small businesses can quickly recover and access services (i.e. Government services, Disaster payments, etc) in the immediate aftermath of natural disasters.
6. **When telecommunication outages occur, there should be an investigation conducted by a regulator (i.e. ACMA) to better understand the quality and performance of telecommunication infrastructure in regional and remote Australia.** Widespread outages of telecommunication services cause significant issues for small businesses and can result in businesses ceasing trade until services are restored. Regulators such as the Australian Communications and Media Authority (ACMA), should review widespread outages to establish the cause of the outage and report on the reliability of telecommunication infrastructure in remote and regional Australia.
7. **We support the introduction of a determination under the Telecommunications Act 1997 to ensure that telecommunication providers have reliable and accessible services.** This determination should introduce a set of standards, rules and benchmarks (including the introduction of a standard time limit for providers to repair faults to their service) for telecommunication statutory infrastructure providers (SIPs). It is vital that regional and rural small businesses have access to a quality telecommunication service, including access to repair and troubleshooting services.
8. **We recommend that the committee consider the importance of investing in various forms of telecommunication services to ensure that regional small businesses are not exposed to a single point of failure.** Whilst we recognise the importance of identifying the most important form of telecommunication services for regional and remote small businesses, it is crucial that regional businesses can access multiple forms of telecommunication services. A diverse telecommunications network will ensure that regional and remote small businesses are able to rely on different forms of telecommunications when faced with unpredictable or unpreventable outages.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Paul Buckingham on 02 5114 6121 or at Paul.Buckingham@asbfeo.gov.au.

Yours sincerely



The Hon. Bruce Billson
Australian Small Business and Family Enterprise Ombudsman