



**Response  
Regional Telecommunications  
Review  
Issues Paper**

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# RIVERINA JOINT ORGANISATION RESPONSE REGIONAL TELECOMMUNICATIONS REVIEW ISSUES PAPER

## Introduction

The Riverina Joint Organisation which represents the councils of Bland, Coolamon, Cootamundra-Gundagai, Greater Hume, Junee, Lockhart, Temora and Wagga Wagga welcome the opportunity to provide feedback to the Review's Issues Paper. Our Member Councils agree with the Committee's assertion that the importance of regional telecommunications has been underlined by recent events including bushfires, floods and the COVID-19 pandemic. Never before have the communities our Member Councils represent been more reliant on Australia's telecommunications' networks.

These events have reinforced the need to ensure that every community has access to high-speed, reliable and resilient broadband and mobile services. Our regional telecommunications' infrastructure must be able to support a plethora of services from health, education and emergency management to business and commerce. In addition, its pivotal role in maintaining social contact with family and friends and the importance of that contact in maintaining health and well-being has been pronounced during the COVID-19 lockdowns and stay-at-home orders.

We have consulted with our Members and provide the following response to the Issues Paper:

## ADEQUACY

- ***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?***

We note the Review's statement that 99.5% of Australia's population is covered by mobile phone services. Our Members' concerns relate to the additional fact that this only covers 33% of the country's landmass. In looking at NSW, the population of Greater Sydney is 5.3 million which represents 65% of the population of NSW but only 1.6% of the total landmass of NSW.

These statistics paint the story of mobile coverage in Australia. The metropolitan areas are well catered for because population density supports investment by the telecommunications' providers, while regional cities are reasonably well provided for within their urban centre. However, those living in rural and remote areas, and in NSW that's over 90% of the State's landmass, are struggling to obtain consistent, robust coverage.

Consequently, our Members strongly believe that future investment in the mobile network should be focused on the 67% of Australia’s landmass that is not currently adequately covered. In addition, we believe that the coverage should, in the first instance, address reception gaps on highly trafficked road networks. Our view is that public investment in mobile phone infrastructure should be directed at improving coverage where the high cost of deployment reduces “commercial incentives for carriers to expand their networks”.

It is anticipated that the phasing out of 3G will cause issues for rural communities and enterprises, particularly those that have relied on the network for telemetry services. It is our understanding that Telstra has committed to providing the same or better service through an expansion of their 4G network. While this decision is welcomed, our preferred option would be to see the replacement 4G network fully operational prior to the complete shutdown of 3G. This would ensure that no consumer is left without the service they are currently relying on.

Mobile services were fundamental to communications during the bushfires of 2019-20, particularly for local government working with emergency services. During the bushfires some of our Members experienced significant difficulties when mobile phone services were compromised and they were unable to readily obtain access to satellite phone services. In one instance a Member Council was forced to send staff to Melbourne to purchase satellite phones so that council workers who were supporting the emergency services response could stay in contact with each other, council and the emergency services. We strongly recommend that the Review consider implementing options that require telecommunications’ providers to supply satellite enabled phones to local government and emergency services when normal mobile connectivity is lost.

The provision of broadband services that are robust and fit-for-purpose are pivotal for growth in regional areas. For years, it has been argued that working from home was achievable in the new NBN environment. COVID forced us to test that argument to the extreme, with entire families having to both work and attend school remotely through a single household broadband connection.

The provision of telecommunications services is, in general, a commercial decision by third party enterprises leveraging off Government infrastructure. While NBN Co’s key objective was to ensure all Australians had access to fast broadband at affordable prices, as a wholesaler, it is not in a position to ensure third party enterprises whose service delivery is market driven will adopt a community service approach that guarantees access in regional, rural and remote areas of Australia.

Despite the Government’s acknowledgement that NBN Co will not generate a commercial return in these areas more transparency in relation to the administration and compliance with the

Regional Broadband Scheme requirements from third party enterprises is essential. This would provide a level of comfort to those within regional, rural and remote areas that their ability to access telecommunications services was being provided in accordance with the stated objective that NBN Co should “support appropriate levels of investment in the network to meet the current and future needs of Australians, wherever they live”.

It has been a particularly trying time for households who are using the Fixed Wireless service, where bandwidth determines the quality of the connection. The problem of inadequate bandwidth to support multiple users, using video conferencing and other high data uses needs to be addressed. The Issues Paper acknowledges the limitations of Fixed Wireless and Satellite and the cost of their provision; however, the Government made a commitment to all of Australia that residents would receive broadband coverage. The two-tier coverage, or even three-tier as satellite can be substantially worse than Fixed Wireless, that is currently the norm is not acceptable and does not fulfil the promises that were made.

Poor quality broadband coverage becomes an even larger issue when we consider that many of the residents with the worst coverage also have the highest expectation of needing to utilise services such as telehealth and remote learning. The very residents that are likely to be the most dependent on quality broadband are the ones that are most likely not to have access to it.

With regard to Fixed Line services, our Members believe that it is imperative that residents continue to have access to the existing copper wire services. Older residents are not necessarily comfortable with VoIP services rely on landlines to stay connected with family, friends and a range of services that are required for aging in place. If these services are to be replaced with Alternative Voice Only Services, then those services must be affordable, accessible and easily understood by consumers.

- ***How have the Government’s policies and programs affected telecommunications service outcomes in regional, rural and remote Australia? How can these be improved?***

Our Members believe there needs to be a greater focus on funding sites where there has been a market failure. We understand the conflict that the Government faces between competition and coverage. However, we believe that coverage should be the major goal for areas with thin markets.

Public money is best utilised addressing areas of market failure, not improving profitability for telecommunications’ providers. It is our perception that it is the Telcos who make the final determination of where Mobile Black Spot funding will be used and that their decision-making is swayed by profitability not necessarily in “plugging” reception gaps. While the current programs allow for some input from councils and communities, we firmly believe that local government should have a much louder voice and be more influential when it comes to determining where

funds are expended to improve connectivity issues. We believe the inclusion of local government voices that understand, through lived experiences, on-ground connectivity issues would result in better value-for-money outcomes.

## RELIABILITY

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

Service reliability is essential for any community, not just regional and rural communities. However, we believe it plays an even bigger role in the rural and remote areas because of the growing dependence on services delivered over the Internet utilising broadband connectivity. Increasingly, medical tests and issues and medical imaging results are not just being accessed by doctors and other health practitioners via the internet they are also being interpreted and discussed using video-conferencing. When services are not working at their optimum levels then there is a real potential for lives to be put at risk.

In regional, rural and remote areas students are relying more and more on education via video conferencing, whether that be outreach from the local Conservatorium or core lessons from school during COVID shutdowns. Again, reliability is key to successful outcomes for students.

Businesses that choose to operate from regional areas need to know that they can transmit their plans and designs to anywhere in the world, and that their goods and services can be accessed by a worldwide customer base. While there is often a focus on download speeds, upload speeds can be more important for those businesses who wish to share plans and drawings with customers. In our region we have a number of specialist manufacturing industries where upload speeds are crucial to their operations, because of poor quality broadband outcomes some have chosen to install proprietary technologies in order to overcome the problems with NBN services.

We strongly recommend that the Review look at the adequacy of upload speeds for businesses operating in regional Australia.

We agree with the Issues Paper's assertion that no communications system is totally resilient during an emergency. However, the reality is, that it is during an emergency when we are most likely to rely upon them. As stated above we believe that solutions with relation to the provision of satellite phones during emergencies should be put into place.

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

Our Members believe there needs to be more consultation with users that are experiencing problems and that this should be followed by targeted investment in the reliability.

## COVID-19

- ***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?***

Lockdowns, stay-at-home orders and quarantine have tested the digital services in regional areas to the fullest. Those with Fibre to the Home or Fibre to the Node have generally been satisfied with the outcomes, however the more users that are on the system the more it degrades. Consequently, more needs to be done to improve bandwidth and therefore speed.

As stated above those who are relying on Fixed Wireless and satellite have really struggled to obtain the necessary bandwidth to adequately meet the demands of working and studying from home. There needs to be a much greater investment in these technologies to improve service delivery for those residents who have been left with these services as their only options.

## OPPORTUNITY

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

High-speed business-grade connectivity is crucial to attracting and supporting new investment in regional, rural and remote areas. In addition, people considering moving from metropolitan areas to the regions, expect quality telecommunications as a “given”. Poor servicing undermines the ability of regional areas to attract and retain skilled workers, new families and industry.

Telecommunications infrastructure development should be delivered in concert with other developments. In our Region Inland Rail is a significant infrastructure development from which numerous industries are likely to leverage. There may be a plan in place to roll out supporting telecommunications infrastructure however the Joint Organisation is not aware of it.

Currently the Joint Organisation is working with Telstra to identify areas where there should be investment to improve mobile phone coverage. The sites that are being identified as priorities will be considered from the perspective of overall benefits that will be generated. For example, we will be looking at the sites prioritised by Members against our Regional Freight Transport Plan to identify where the best value-for-money investments lie.

We believe that this co-design approach should be taken up by the Commonwealth when determining where funds should be invested, because it ensures that the improvements are being made where the best outcomes are likely to be achieved for the community and not just for the Telco.

- ***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?***

We struggle to determine any models that would attract alternative investors. Investors seek returns on their investments and returns in telecommunications' infrastructure located in rural and remote areas usually minimal or indeed negative.

## EMERGING TECHNOLOGIES

- ***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?***

Rather than harnessing new technologies, many in regional, rural and remote areas of Australia would be comfortable with being able to access existing technologies.

Nevertheless, the new technologies that the Joint Organisation has considered have focused on improving the reception for mobile applications and the adoption of IoT. However, Local Government always seeks solutions that will benefit the broader community and to date most of what we have viewed are subscriber-based offerings which consequently do not meet our Member Councils' purposes.

Our Member Councils have been part of the Southern Lights NSW initiative which has resulted in the deployment of 75,000 smart-ready LED streetlights across 41 LGAs stretching from Bega to Broken Hill. The lights can be fitted with Smart City applications and we are exploring options for this. However, cost will be the barrier to entry, and while the lights remain ready for Smart applications, whether they are ever used for this purpose will depend on the affordability of communication technologies like IoT and 5G.

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

Our Members support Government investment in new technologies but only where they provide a broad public benefit. There has been a strong focus on building "things" to stimulate the economy coming out of COVID. Rather than just considering roads, bridges and buildings

perhaps the Government could look at making investments in telecommunications' solutions for rural and remote communities. More funding that addressed mobile phone blackspots and ensured access to 4G and 5G technologies would be welcomed.

## MAXIMISING OUTCOMES

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

We believe that the best outcomes are delivered when solutions are co-designed. The focus to date appears to have been on what the Telcos are prepared to investment in. While this is a perfectly sound approach when they are investing their own money, it is not the approach that should be taken with Government investment.

Local Government in a position to make investments in improvements to telecommunications but is very well placed to provide informed, on-ground advice on the best value-for-money options for investment.

The ability for mobile phones to roam from provider to provider would greatly improve telecommunications in regional areas and maximise outcomes. Currently, the focus is on the duplication of infrastructure in order to obtain competition. Mobile roaming allows a mobile phone to be used outside the range of its home network by connecting to another available network. In thin markets where there are limited consumers the duplication of expensive telecommunications infrastructure seems a waste of public money. The introduction of mobile phone roaming would address this issue and result in much better value-for-public money outcomes.

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

The Government needs to implement a co-design approach to ensure that it is getting the most efficient and effective outcomes in relation to telecommunications' investments.

Investment programs should target areas where there are identified black spots based on needs such as transport routes, vulnerable communities etc. and not projects that provide the greatest financial advantage to telecommunication carriers. Until this fundamental change is made rural and remote Australia will be consigned to substandard mobile phone and internet services.



## AWARENESS

- ***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?***

This question assumes that regional consumers are spoiled for choice, they are not. In relation to mobile services, maps that genuinely show coverage of a Telco's services not the optimum reach for the network, as seems to be current practice, would be useful.

We are currently working with Telstra to determine ways that the Joint Organisation can support our Member Councils to inform the communities they represent in relation to the 3G phase out. Consumers are going to have to make some important and possibly complex choices about how to respond to the loss of 3G. We understand that the 3G network is currently supporting much of the telemetry technologies that are being used on farms. Information will need to be provided to 3G users in relation to the most efficient and effective replacement technology.

Greater Hume Shire, one of our Member Councils has suggested that an independent 'plain English' comparison website should be developed. The website would allow consumers to compare and contrast connectivity options whilst also clearly articulating any shortcomings of the options. We strongly support this recommendation. Consumers too often find themselves lost in telco-speak when purchasing a telecommunications solution. A Plain English guide would assist in addressing this problem and perhaps in assessing the veracity of the claims being made by providers.

## PUBLIC INFORMATION

- ***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?***

A commitment to Plain English guides and information produced by an independent source would greatly assist all consumers not just those in the regions. Consumers cannot make an informed decision if they do not understand the terms that are being used to describe the service that is being provided.

As stated above improved mapping for mobile and Wi-Fi services would also assist in decision-making.