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**Australian Government**

Consumer Safeguards Review

Department of Infrastructure, Transport, Regional Development and Communications

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Dear Review Team,

**CWAA submission – Australian Government Department of Infrastructure, Transport, Regional Development and Communications – Consumer Safeguards Review Part C: Choice and Fairness**

The Country Women's Association of Australia (CWAA) appreciates the opportunity to provide a submission to Part C of the Consumer Safeguards Review. The CWAA's objective is to advance the rights and equity of women, families and communities in Australia through advocacy and empowerment, especially for those living in regional, rural and remote Australia.

The CWA of Australia supports some of the proposed changes to the current regulatory and voluntary arrangements for telecommunications consumer safeguards as proposed in the Discussion Paper. Some legacy consumer protections such as that for fixed line services will remain relevant particularly for regional, remote and rural Australians and should therefore be carried over into the new regulatory regime.

Given the large land mass and the relatively low population numbers in rural, regional and remote Australia, choice and fairness is of critical importance for Australians living in these areas. Choice and fairness should be specifically aimed at these and other vulnerable and disadvantaged sectors of society. It is disappointing that the unique needs of regional, rural and remote Australians were not considered in the Part C Discussion Paper.

The CWAA is a member of the Regional Rural and Remote Communications Coalition (RRRCC). The RRRCC's specific telecommunications asks fall under its five main policy and advocacy objectives which are:

1. Guaranteed access to voice and data services.
2. Equitable voice and data services that meet minimum standards and reliability.
3. Continued program to expand mobile coverage.
4. Digital capacity building for regional, rural and remote Australia.

## 5. Affordable communications services for regional, rural and remote Australia.

The CWAA supports the submission of the Australian Communications Consumer Action Network (ACCAN) and in particular their detailed analysis of affordability of communications, digital exclusion, market concentration and lack of competition, and the enforceability of industry code-making.

### **The Terms of Reference**

The Terms of Reference for the Consumer Safeguards: Part C Choice and Fairness, specifically stipulates that the safeguards are to enable consumers to make an informed choice in selecting services. The CWA of Australia submits that there are vast shortfalls in meeting this requirement under the current regulatory regime. Consumers in the regions are not protected, choice and fairness are a significant issue where one telecommunications provider holds a *de facto* monopoly service.

Affordability and reliability are significant concerns in rural areas. Consumers are frustrated to be paying the same or higher rates for services that are largely inferior to metro services. As well as this, often consumers in regional areas are required to purchase additional equipment like boosters, which acts as another barrier and challenge in terms of affordability, access and technical capability.

Service standard challenges are a constant frustration for rural, regional and remote Australians. The CWA of Australia submits that the opportunity to incorporate these long-established challenges is relevant to the Terms of Reference for Part C of the Consumer Safeguards Review.

### **Digital inclusion**

Australia's Digital Inclusion Index 2019 shows that digital inclusion is 8.1 points higher in capital cities (63.8%) than in country areas (55.7%). This gap, although showing a downward trend over the last 10 years, is significant. The CWAA supports and welcomes the initiation of the Digital Tech Hub announced earlier this month, sponsored by the Australian Government and administered by the National Farmers Federation and ACCAN, as an initiative to improve digital literacy, awareness, and connectiveness.

The CWAA remains hopeful for an improvement to the digital inclusion of rural regional and remote Australians as a result of the Digital Tech Hub, however without strengthened legislative and regulatory requirements in relation to competition, affordability and customer service (in particular, accountability of service providers) a Digital Tech Hub can only go so far.

### **Appendix C- Analysis of legacy obligations**

**Untimed local calls** - The CWAA recognizes that most landline and mobile plans entail unlimited local calls and therefore this requirement may become less important, however for Australians, particularly in rural regional and remote areas, who are still relying on the landline, untimed local calls are still relevant where mobile coverage is not available at the place of residence or business. Perhaps it is the case that unlimited local calls are included in phone services packages because of the requirement to include untimed local calls. CWAA submits that guarantees for untimed local calls are still important and should be carried over under a reformed regime.

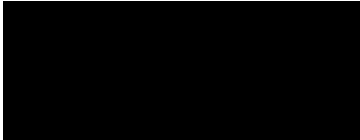
**Itemized billing** – The CWAA also recognizes that these requirements may be less applicable because of the trend toward unlimited service plans. However unlimited plans are not universally applicable or available, particularly for regional rural and remote Australians, and therefore itemized billing is still required for those using traditional services such as fixed line.

**Telstra price controls**- This obligation was initially required to support development of market competition and facilitate equity and affordability. This objective and requirement remain just as relevant today for rural, regional and remote Australians who are heavily reliant on Telstra services for any sort of connectivity. The

discussion paper considers that these rules may be redundant as the Minister may make rules in relation to price caps under the relevant Act of Parliament. However, where it is the case that these rules are yet to be legislated, they need to remain within the remit of the Consumer Safeguards. As mentioned above, the price of services in rural, regional and remote Australia is inflated due to the lack of competition amongst providers. Specific protection for consumers is required to establish equity and price parity.

As has been demonstrated in recent bushfires and COVID-19, telecommunications are an essential service for all Australians, including and especially for those who do not live in highly populated areas. We support modernization of the Consumer Safeguards, provided general inequities faced by rural regional and remote Australians are addressed in the process.

Yours faithfully,



**Tanya Cameron OAM**  
**National President**