

30 September 2020

Consumer Safeguards Review  
Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 2154  
CANBERRA ACT 2601

Via email: [consumersafeguardsreview@communications.gov.au](mailto:consumersafeguardsreview@communications.gov.au)

To whom it may concern,

**RE: Consumer Safeguards Review Part C: Choice and fairness**

The Regional, Rural and Remote Communications Coalition (RRRCC) welcomes the opportunity to provide input into the Consumer Safeguards Review Part C: Choice and fairness.

The RRRCC is an alliance of 21 volunteer and advocacy organisations with a shared interest in improving telecommunications in the bush. The Coalition was formed in 2016 to raise awareness of the vital role of connectivity for regional, rural and remote Australians and to advocate for continued improvements. The RRRCC's advocacy efforts are focused on five high-level goals, under which we have articulated a number of specific asks. The RRRCC's five goals 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.

Access to reliable, affordable, quality telecommunications underpins the viability of regional development across Australia. Digital connectedness can improve social engagement, health, and wellbeing for communities and individuals across the country. Allowing regional communities access to the digital economy through business development, education services and social connectivity is required if a region is to grow, improve and sustain.

RRRCC founding member, the Australian Communication Consumer Action Network (ACCAN), has been closely involved in the Consumer Safeguard Review process over the last three years, consulting a broad group of organisations to inform their responses to part A, B and C of this process. ACCAN has a wealth of knowledge and expertise on the communication and connectivity requirements of all types of consumers across the country, including those who reside in regional, rural and remote locations. The RRRCC sees the submission provided by ACCAN as the most accurate representation of consumer needs when related to choice and fairness. The RRRCC supports the ACCAN submission, and their accompanying recommendations and would like to make the below comments.

**Affordability**

Affordability of communications is considered one of the top priorities of the RRRCC. More detailed and effective discussion is required around affordability options for regional rural and remote consumers. The RRRCC supports the position that a separate and more detailed look at affordability provisions and their impact on choice in the telecommunications sector must take place. A range of affordable options must be offered to consumers. With the wide range of factors contributing to the decision of service, specifically for regional

consumers, the Government cannot rely solely on nbn providing affordable options. The creation of targeted concessional services would allow RSPs to offer competitive rates to low-income consumers while maintaining consumer choice between providers.

**Information accuracy**

The RRRCC would like to reinforce the significant issue of misinformation and confusion experienced by regional, rural and remote consumers. Accurate information is essential for consumer protections as it impacts consumers’ ability to exercise choice. Delivery of misinformation creates opportunities for providers to treat consumers unfairly and will likely impact their ability to make an appropriate choice of service.

**Legacy technologies**

The RRRCC understand that the communications environment has changed dramatically since the introduction of some of the legacy consumer safeguards. Even so, it is important to note that the needs of regional, rural and remote consumers differ to those in metropolitan areas. The RRRCC believes that there are a variety of legacy obligations that continue to be relevant to regional, rural and remote consumers and there must be a clear pathway for these services, or equivalent services to remain. Further information on the specific obligations can be found detailed in the ACCAN submission.

Thank you again for the opportunity to provide this letter of support. Should you require any further information, please contact Adrienne Ryan, General Manager Rural Affairs at the National Farmers’ Federation, on [REDACTED] or [REDACTED].

Yours sincerely,

**The Regional, Rural and Remote Communications Coalition**

