TELSTRA CORPORATION LIMITED

Response to Digital Technology Hub consultation paper

21 February 2020

Introduction

This submission responds to the *Digital Technology Hub* consultation paper issued by the Department of Communications and the Arts in January 2020. Our views are set out below in response to the questions posed in the paper.

01 What source of information should be incorporated into the design of the Digital Tech Hub?

The consultation paper states that the Digital Tech Hub will be operated by a contracted third-party provider on behalf of the Department. In noting the types of information that will be included on the Digital Tech Hub, and that it will not prioritise any particular product or service, particular attention will need to be placed on the presentation of information for consumers and businesses. In our view there needs to be a clear statement that the Digital Tech Hub does not provide recommendations or rankings of services and products.

We accept that the intention is to provide links to other websites for information, including RSPs and infrastructure providers such as Telstra. These will also likely serve as some of the main sources of information for the content presented on the Digital Tech Hub. In our view there needs to be a process of review and verification of the information before it is published to ensure it is factually accurate and doesn't provide opinions on matters of public policy. This review mechanism should be independent of the contracted third-party provider and be overseen by the Department.

02 What other existing networks can be used to promote the Digital Tech Hub?

In addition to the options outlined in the consultation paper, the promotion of the Digital Tech Hub can be targeted at organisations representing regional residential and business consumers. This would include associations such as the Country Women's Association of Australia (**CWA**), Isolated Children's Parent's Association (**ICPA**), industry groups such as state farming organisations, and regional chambers of commerce via the Australian Chamber of Commerce and Industry (**ACCI**).

03 What social media presence is most relevant to regional consumers?

Telstra does not have a recommended social media platform relevant to regional consumers. The common platforms such as Facebook and Twitter are relevant, but should link back to the Digital Tech Hub website as the source of factual information.

04 What 3 to 4 hour window would best suit a limited-hours phone service, if implemented?

In our view the offering of a phone service has added risks that the Digital Tech Hub service will be drawn away from being product and service provider neutral. Enquiries via a phone service could result in lines of questioning that seek opinions and recommendations. To protect the integrity of the service we recommend that the Digital Tech Hub be provided as an online service only and, where relevant, refer individual customers to the call centres of their own service provider to resolve technical or account issues.

If a limited-hours phone service is implemented, then rules and systems should be put in place that ensure the integrity of the service is maintained as a neutral provider of information. Based on our own experience with regional customers, the busiest block of incoming calls for our call centre fall between 11am-2pm (ACDT) on any given day.

The challenge in offering a limited-hours service will be finding a time that will suit the different time zones operating, including allowing for daylight saving differences between jurisdictions.

05 For retail service providers: what kind of in-kind support can you provide for the Digital Tech Hub?

As a retail service provider, Telstra can provide up-to-date content from our own sources on various products and services on offer to our customers. It will be important that service provider information is consistent and up-to-date between the Digital Tech Hub, with a link to the service providers own website page. It is also our view that the Digial Tech Hub clearly state a disclaimer that the information provided from different service providers is for information purposes only and not provided for comparative purposes.

We also submit that key service providers should be consulted on what information should be posted and the criteria used to supply that information, including how systems can be put in place to ensure it remains up-to-date.

Telstra will also provide a briefing to our customer support team about the Digital Tech Hub service once commissioned, explaining the role it plays and the process for consumers to access it.

06 What information would be most useful to help small and medium businesses to maximise the benefits of digital connectivity?

The challenge with the provision of this information is the breadth of industries that would need to be covered, as well as the knowledge base that might exist around digital connectivity (from basic to more advanced). The basis of the information should be focussed on baseline information for users, explaining what the Internet of Things (IoT) encompases, the network(s) available to support IoT devices and the types of industry specific solutions that it can support.

07 What information would be most useful in assisting communities to undertake local digital planning?

The Digital Tech Hub could survey local governments around their understanding about digital connectivity and the knowledge gaps that exist in their ability to perform community digital plans. The types of factual information that the Digital Tech Hub intends to house, including links to relevant source sites, should be suitable to support local communities undertaking digital planning.

08 What information would be most useful in assisting communities to prepare for, and best use digital connectivity during disaster and emergency situations?

At most the site should be a portal that links members of the community to appropriate disaster and emergency information that is housed on central platforms. Due to the changing nature of information

available during an event it is best that the service link to other central portals to ensure the accuracy of the content. This includes to infrastructure providers and companies designated to support emergency services.

09 What options are there to fund the operation of the Digital Tech Hub beyond its two year funding period, e.g. paid advertising?

In our view paid advertising or the implementation of an industry levy would not be appropriate to fund the operation of the Digital Tech Hub beyond the initial two year funding period. Paid advertising would risk impacting the independence and perception of impartiality of the service. An industry levy would be an unnecessary cost on the sector at a time when much of the information is already available on different platforms.

We recommend before any consideration around funding the operation beyond two years that the Department initiate an independent review on the success of the model. This should look at metrics around the performance of the service, including but not limited to:

- unique visits to the service and areas of greatest interest from the general public;
- direct engagement from third parties for specific information to support digital plans;
- feedback from relevant stakeholders, including advocacy groups (ACCAN, BIRRR), infrastructure providers and RSPs; and
- random awareness and usage surveys from regional customers / businesses.

Depending on the outcomes of that review a decision could be made about the validity of continuing the service, which would be best delivered through a continuation of Government funding to maintain the independence and impartiality of the information provided.