

25 November 2016



ACCAN Review
Department of Communications and the Arts
Via email: accanreview@communications.gov.au

**Re: Consumer representation
Review of section 593 of the *Telecommunications Act 1997* Issues Paper**

The National Farmers' Federation (NFF) welcomes the opportunity to make a submission to the *Consumer representation: Review of section 593 of the Telecommunications Act 1997* issues paper. The NFF strongly supports continued funding of the Australian Communications Consumer Action Network (ACCAN).

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. The NFF's membership comprises of all Australia's major agricultural commodities. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations collectively form the NFF.

As shown in the issues paper, the telecommunications market in Australia has become increasingly complex over the last 20 years, requiring detailed technical knowledge of telecommunication technologies. Industry bodies such as the NFF have expertise in highlighting gaps in telecommunication markets; however, we do rely on expert information from ACCAN to recommend feasible solutions to tackle telecommunication downfalls in regional and rural Australia.

Q1: Has ACCAN effectively performed the role of representing the interests of consumers in relation to telecommunications?

The NFF judges ACCAN's role in representing regional and rural telecommunication consumers as invaluable. Especially with regards to the Universal Service Obligation (USO) inquiry undertaken by the Productivity Commission in July 2016, ACCAN has provided a comprehensive overview over the downfalls in regional telecommunications, representing, among others, indigenous organisations, regional organisations and farmers' federations.

Q2: Does ACCAN effectively engage with a broad range of stakeholders, including industry, government and other consumer groups?

The NFF commends ACCAN for its comprehensive engagement strategy. NFF has been party to extensive regional communication forums held by ACCAN, the latest in October 2016, and been impressed with the drive and energy ACCAN is putting into ensuring telecommunication users in regional, rural and remote areas of Australia have equitable, reliable and adequate access to voice and data services.

Q3: Considering the consumer representation role performed by ACCAN, has ACCAN adopted an appropriate balance between representation of general consumers and representation of those with particular needs?

The NFF believes that all consumers have the same core needs: Access to reliable, equitable and adequate voice and data services. ACCAN consistently advocates to government and MNOs to ensure that the divide between offline and online users as well as urban and regional users does not widen.

Q4: Is a telecommunications specific consumer representative body funded by Government required or:

a) Should Government fund representation only for a body or bodies representing consumers with particular needs?

The NFF is of the view that fragmentation of representation bodies would lead to incoherent messages, leaving the most vulnerable telecommunication users behind. There already are multiple industry and consumer bodies such as the NFF who look after specific groups in society without necessarily having the resources to decipher technical telecommunication issues. To us, it is therefore invaluable to have a single body representing all telecommunication users and navigating the complex and technical telecommunications field.

b) Could a telecommunications representation function be carried out by a general consumer body?

Especially in the past twelve month, there have been a multitude of uncoordinated inquiries into telecommunication issues on a federal level (e.g. the USO inquiry by the PC or the ACCC's roaming inquiry). The NFF judges it critical to have a single dedicated body to provide technical expertise for consumer advocacy groups and to ensure a coordinated approach to address key telecommunication issues.

c) Could Government more directly measure consumer views by undertaking its own consumer research?

The NFF maintains that ACCAN as a specialist advocacy body is required in the consumer research space. ACCAN offers invaluable expertise in the areas of telecommunication agencies, technologies, services etc. and investigates the interests of different telecommunication consumer groups.

For further information, please contact:



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