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Department of Communications and the Arts

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Submission to *Regional Connectivity Program – discussion paper*

Dear Executive Manager

I am pleased to provide comment to the Department of Communications and the Arts (DOCA), on behalf of the NSW Government Telecommunications Authority (NSW Telco Authority), on the *Regional Connectivity Program – discussion paper*, released in August 2019.

The NSW Telco Authority is constituted by, and functions under, the *Government Telecommunications Act 2018* (NSW) to operate and maintain operational communications services for public safety and government agencies within New South Wales.

The NSW Telco Authority is supportive of the proposed Regional Connectivity Program. The NSW Telco Authority has a key role in NSW regional areas, concurrently offering the 'Connecting Country Communities' fund, which supports both the NSW Mobile Black Spot Program and the Regional Digital Connectivity Program. Considerable alignment with the Regional Connectivity Program is expected.

Under the Mobile Black Spot Program, the NSW Government has committed more than $39 million to build at least 183 new or improved mobile base stations throughout the state. The NSW Telco Authority works in partnership with the Department of Premier and Cabinet on the program, which is being delivered in partnership with the Australian Government and mobile network operators. In NSW, 159 new sites have been built to date.

The Regional Digital Connectivity Program is part of the state government's $50 million Connecting Country Communities Fund, which is investing in infrastructure to provide fast and reliable broadband internet access to regional communities in NSW. Delivered in partnership with the Department of Premier and Cabinet, it aims to enable the same level of digital connectivity in the regions as is available in metropolitan areas.

The NSW Telco Authority provides the following responses to the specific issues for comment contained in the DOCA discussion paper.

Question 1
Are there additional key elements that should be incorporated into the design of the Regional Connectivity Program?

A key element of the program should be 'quality of service' to ensure people in regional areas have access to the best possible service.

Some aspects to consider relating to quality are:

- Service speeds
- Data capacity

- Future proofing of equipment used
- Coverage and reliability

Applicants should demonstrate that high quality service will be provided with current, reputable technology that is future-proofed.

Another key element of the program should be alignment with other related infrastructure programs, such as the NSW Government's Regional Digital Connectivity Program, Mobile Black Spots Program and the Critical Communications Enhancement Program.

Question 2

Should other parties, for example local government authorities, business organisations or industry groups, be allowed to lead a bid for Regional Connectivity Program funding?

Yes. However, eligible applicants would need either a carrier licence to supply any carriage services such as telephony or internet to the public, have a nominated carrier declaration in place, or partner with a licenced carrier.

A list of licenced carriers can be found on the ACMA website.

Eligible applicants should also demonstrate knowledge of the sector, including the current funding environment and government programs supporting regional digital connectivity.

Question 3

Are there other organisations beside local, state and territory governments that could be considered 'trusted sources of information' for the purposes of identifying local telecommunications priorities?

Yes. There are likely key industry and community groups that have detailed understanding of local priorities and possible solutions.

Some possibilities are:

- Sector peaks such as NSW Farmer's Association, Cattle Council Australia, Meat and Livestock Australia, Agricultural Societies Council NSW, Regional Development Australia etc.
- Emergency Service Organisations, including Royal Flying Doctors and Rural Fire Service.
- Health facilities
- Community and Educational groups

Question 4

Are there ways that the Department can facilitate linkages between potential infrastructure providers and local communities?

Events showcasing the program in designated communities could raise awareness of the issues and potential solutions. This could include stands from key government offices as well as relevant industry groups, such as farming and IT/ telecommunications groups, with attendance from local community members. Alternatively, a Regional Connectivity Program stand could have a presence at local fairs or events.

Agile, accelerator groups can be engaged to facilitate consultation. Such groups are often skilled at consulting communities to understand and record their views (e.g. Digital.NSW Accelerator).

Question 5

Are there any comments that you wish to make in relation to co-contributions?

The NSW Telco Authority realises that co-contributions can assist applicants to secure funding for larger projects and can spread associated risks, however, we make the following points:

- There needs to be good communication and linkages between any funding bodies (local, state and federal departments) involved to ensure smooth operation of joint-funded projects. This includes transparency of agreements (sharing templates or key aspects) to ensure priorities align and are not disruptive to the project.
- Reliance on co-contribution limits opportunities. Interested, valid applicants might not be successful gaining funding from alternative sources (e.g. state) due to timing or particular criteria, although they might be well-suited to the Federal funding.

Question 6

What type of projects should be considered for funding through the Regional Connectivity Program?

Nil comment – proposal supported.

Question 7

Are there any comments that you wish to make in relation the proposal that all Funded Solutions will provide Retail Services for a minimum of 10 years after the Asset has become operational?

The NSW Telco Authority notes that any telecommunications related service could be outdated within 10 years of operation. Any service planning to operate for ten years or more should be future-proofed and ready to adapt to new technologies as they arise during the term of the project. In relation to the sustainability of Retail Services, DOCA should consider developing technologies and how the applicant proposes to adapt as needed.

Question 8

Are there any comments in relation to the proposed Eligible and Ineligible Areas?

Nil comment – proposal supported.

Question 9

Are there any comments that you wish to make in relation to the proposed eligible and ineligible expenditure?

Nil comment – proposal supported.

Question 10

Are there particular circumstances where it may be appropriate for the Commonwealth to make some contribution to ongoing operating expenses?

Yes. In some cases, a one-off grant can contribute to ongoing operating expenses or service costs. The applicant would need to provide assurance that the service/project is sustainable for the intended period.

Question 11

Is there a case for a third category, for highly localised solutions for projects that, for example, are seeking funding of less than $200,000 (GST inclusive)?

The NSW Telco Authority acknowledges that applications for smaller amounts under $200,000 are possible but not likely.

Question 12

Are there any other design principles that should be considered?

Nil comment.

Question 13

Do you have any comments on the proposed assessment criteria?

Nil comment.

General

Any other comments?

Nil comment.

Yours sincerely