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2018 Regional Telecommunications Review Secretariat
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Submission to Regional Telecommunications Review 2018

Accessibility, affordability, lack of digital literacy skills and limited choice remain key barriers for people in outer regional and particularly remote and very remote areas, this remains unchanged since our 2015 RTIRC Submission. The potential solutions for addressing these barriers should not be introduced in an *ad hoc* fashion, but rather as part of an overall Remote Telecommunications Strategy which includes an overarching digital inclusion framework. We commend the AIDA submission and their call for the development and implementation of a Regional and Remote Digital Inclusion Strategy.

While the rollout of the NBN and successive rounds of the Mobile Black Spots Programme (MBSP) are welcome and have improved connectivity in some areas, the fact must be faced that despite these developments the *2017 Australian Digital Inclusion Index* found that there remains a digital divide between rich and poor, city and country[1]. We suggest that, in light of these findings, Government needs to reconsider its telecommunications policy. Clearly the NBN and MBSP will not offer the solutions to all of regional and remote Australia's telecommunication needs.

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[1] Thomas, J, Barraket, J, Wilson, C, Ewing, S, MacDonald, T, Tucker, J & Rennie, E, 2017, *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2017*, RMIT University, Melbourne, for Telstra, p5, 6, 13. Available on-line at https://digitalinclusionindex.org.au/the-index-report/report/ [accessed on 31/7/2018]

These findings reinforce the case for the development of a much more nuanced remote telecommunications strategy, one which also recognises and actively supports backhaul solutions and alternative and emerging technologies as a pathway to improved coverage, reliability, affordability and greater choice. Such a strategy should also consider how best to provide post-installation/sales support to end users in remote and very remote areas, many of whom (particularly in Indigenous communities) have limited IT knowledge and skills.

More work needs to be done to provide flexible and user-friendly arrangements around installation, plan options, and billing for remote consumers. Apparently basic tasks such as accessing information regarding how to get an internet connection, types of plans available, and simply attempting to arrange for a connection remain problematic in many remote Indigenous communities. These issues are described in *Internet on the Outstation*[2] which was the result of a longitudinal study on home internet in several remote Indigenous communities in the NT, this report remains relevant today.

We urge the Committee to recommend that the Australian Government work with all levels of government and other stakeholders to develop a Remote Telecommunications Strategy which includes addressing digital inclusion.

It is our experience that market failure continues to characterise the telecommunications industry in remote and very remote NT. Unfortunately some government programs, such as the MBSP, while increasing access to services for consumers, have perversely exacerbated this market failure by further entrenching the dominant telco. This results in fewer choices for consumers which in turn impacts on affordability.

We note the Committee's interest in hearing from businesses and other organisations that are installing telecommunications infrastructure in regional Australia[3]. We would like to draw the Committee's attention to the Northern RDA Alliance's high speed wireless internet project, which aimed to test the capability and affordability of alternative backhaul solutions. Connectivity has been achieved through the construction of long-distance point-to-point microwave links that connect directly to Vocus (previously Nextgen) fibre.

All design parameters have been exceeded. Final throughput exceeds 300Mbps aggregate (design 80Mbps), latency is less than 6ms (design 12ms) and jitter is less than 1ms. The network covers a total distance of around 320kms with the greatest distance between two links being 53km. The total cost to install the system (including cash and in-kind support from all project partners) was around $500,000. Technical project challenges mainly related to tailoring the infrastructure and service to meet the needs of the clientele as well as the need for the infrastructure to be lightweight and unobtrusive in the landscape.

[2] Rennie, E, Hogan, E, Gregory, R, Crouch, A, Wright, A & Thomas, J. 2016, *Internet on the Outstation: the digital divide and remote Aboriginal communities*, Theory on Demand 19, Institute of Network Cultures, Amsterdam. Available on-line at http://networkcultures.org/wp-content/uploads/2016/06/TOD19-Internet-on-the-Outstation-INC.pdf [accessed 31/7/2018]

[3] *Regional Telecommunications Review 2018 Issues Paper*, p11-12.

The completed project has demonstrated that cheaper alternative backhaul solutions are possible in very remote areas and can provide a superior service to satellite. These types of solutions could be used elsewhere in the NT and across Northern Australia, as well as in other sectors, such as primary industries, that need access to high speed, reliable, internet. However, it is important for the Committee to understand and acknowledge that these solutions (and flow-on benefits such as greater competition, better customer experience, greater productivity for both the public and private sectors) will not be realised in areas where smaller providers have to compete with a long-established incumbent player that is prepared to protect their monopoly.

Given the extent to which mobile connectivity has featured in the *Issues Paper*, we are concerned that the Australian Government has not committed to funding the MBSP beyond 2019-2020, despite there being in excess of 10,000 mobile black spots on the database.

We urge the Committee to recommend that Australian Government funding for the MBSP continue beyond Round 4.

In order to ensure greater choice for end-users (and to avoid perverse outcomes of the type already referred to in this submission) we also urge the Committee to recommend that the criteria around co-location and roaming be strengthened so as to comprise a greater percentage of the overall points.

Of the final 867 base stations that will be established as a result of the previous three rounds of the MBSP, only 2.3% will be in the NT. It is in this context that we argue that any new economic and social indicators should not disadvantage those areas that are already disadvantaged by isolation and low population. Instead, we suggest that additional indicators should relate to how the installation of mobile coverage will contribute to Government policy objectives such as Closing the Gap and Developing Northern Australia. Or, for example, investing in communications along critical rural and remote freight routes in accordance with the recommendations of the *Inquiry into National Freight and Supply Chain Priorities.*

It is also important that mobile connectivity is considered a complementary form of connectivity, and not the sole form of connectivity, particularly in remote and very remote areas. Page 13 of the *Issues Paper* flags a potential scenario whereby more consumers use mobile networks rather than fixed line networks with the savings from supplying the copper services directed to additional investment in mobile services. Mobile is a relatively expensive form of connectivity and mobile devices are more limited in capacity than desktops or laptops, which impacts upon the types of activities that can be successfully undertaken[4], and in turn participation in a range of economic and social activities.
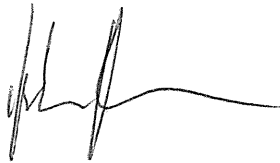
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[4] Thomas et al 2017, p24

An RDA NT staff member who relies heavily on the 4G network for voice and data has found that this type of connectivity is inadequate to allow real-time participation in webinars, Skype and other activities requiring a reliable high-speed connection. Remote and very remote communities should not be forced to rely on a single form of connectivity that will be expensive and that may not allow them to fully access a range of health, education and other services on-line. Such a solution would not be equitable in terms of affordability and particularly not in terms of access given that on-line services are of much higher importance where extreme remoteness is a factor.

Regarding the preference for mobile devices and pre-paid billing in Indigenous communities[5], the Committee should be cautious in concluding that mobile is an appropriate solution for all Indigenous communities. Some communities have been ambivalent about the introduction of mobile because of the risk of cyberbullying. We are aware of a recent situation in which some Indigenous people in a very remote community called for the mobile tower in their locality to be switched off for a period due to an escalating local dispute. We also draw the Committee's attention to the findings of the *2017 Australian Digital Inclusion Index*, notably that mobile-only users are less digitally included than the general population[6].

The Issues Paper indicates that the Committee will also consider relevant views from the Consumer Safeguards Review. We take this opportunity to refer the RTIRC Committee to submissions made to the Joint Standing Committee on the National Broadband Network as a number of these submissions contain information and observations that are highly relevant to the current Review.

Yours sincerely

Kate Peake
Chief Executive Officer, RDA NT

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[5] *Regional Telecommunications Review 2018 Issues Paper*, p6.
[6] Thomas et al 2017, p24.