5-Year Productivity Inquiry: Australia's Data and Digital Dividend

NBN Co Ltd submission to the Productivity Commission on the Interim Report

October 2022

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1 Introduction

NBN Co welcomes the opportunity to provide input into the Productivity Commission's (**Commission**) inquiry, the *5-Year Productivity Inquiry: Australia's Data and Digital Dividend* (the **Inquiry**). This submission is prepared in response to the Inquiry's Interim Report released on 23 August 2022.

Throughout its Interim Report, the Commission makes a number of observations and insights, and raises a number of potential recommendations. This submission responds to these in an integrated manner:

- Part 3 of this submission responds primarily to Section 3.1 of the Interim Report (Investing in regional digital infrastructure), including Recommendation Direction and Information Request 3.1;
- Part 4 of this submission responds primarily to Sections 3.3 (Developing digital, data and cyber security skills) and 3.4 (Balancing cyber security and growth) of the Interim Report; and
- Part 5 of this submission responds primarily to Section 3.6 (Coordinating the policy and regulatory environment) of the Interim Report.

In all, NBN Co is supportive of the Commission's goal of ensuring Australia's digital future is equitable and secure. NBN Co considers that the mechanisms through which this goal is achieved must take into account the current and future changes in the market and technology landscape, including the need for and availability of broadband infrastructure, the provision of voice services over that infrastructure (both fixed and mobile), and initial steps already taken towards reform (through the introduction of the Statutory Infrastructure Provider (**SIP**) regime). Central to the policy architecture, NBN Co submits, is a reformed regime underpinning universal service.

As an organisation, NBN Co recognises that its future will be characterised by Australians' continued increasing need for digital services, rapid changes in technology and demand for greater value. Along with communications and critical infrastructure legislative reform, these are some of the key parts of NBN Co's future it knows about today. NBN Co knows that its future will bring other challenges and opportunities, and that the company's security and privacy capability has a key role in this future as a business enabler.

Security and privacy at NBN Co operate under a converged (all-hazards) model where physical, personnel, cyber and privacy capabilities interconnect and work collaboratively together. This approach treats all security and privacy risks under a common framework of risk assessment, control, and mitigation across the organisation. It brings the best of existing disciplines into a coordinated approach.

2 About NBN Co

NBN Co is the Government Business Enterprise (**GBE**) responsible for the construction and operation of the **nbn** network in accordance with Commonwealth Government policy. NBN Co is committed to responding to the digital connectivity needs of all Australians; working with industry, governments, regulators and community partners, to lift the digital capability of Australia.

Working in collaboration with industry partners, NBN Co is committed to connecting Australian homes and businesses so they can access the social and economic benefits that fast broadband enables. The **nbn** network plays a critical role in keeping communities connected, schools active, businesses operational, and the nation productive.

NBN Co's purpose is to lift the digital capability of Australia, allowing Australians to have access to a fast, reliable broadband network, at the least possible cost to the taxpayer. NBN Co delivers high-speed broadband to customers across Australia over an area of more than seven million square kilometres. To date, this has involved investment of more than $51B into the **nbn** network. For the purposes of this submission, two key features of NBN Co are critical:

1. **NBN Co provides wholesale broadband infrastructure to facilitate and enhance competition thereby providing greater choice for consumers across Australia including in regional and remote areas.**

   *NBN Co is structured as a wholesale-only, open-access broadband network. This is intended to level the playing field in Australian telecommunications, creating real and vibrant competition within the industry and providing choice for consumers. As a network wholesaler, we provide wholesale broadband to access seekers such as Retail Service Providers (**RSPs**) on a non-discriminatory basis.*

2. **NBN Co is aligned with the Government's commitment to universal service**

   NBN Co understands the importance of ensuring every Australian has access to voice and broadband services and the crucial role that SIPs play in delivering those services. For example, NBN Co has a dedicated Regional Development and Engagement group to address and improve rural and regional outcomes by leveraging a range of technologies, such as fixed broadband, fixed wireless, and satellite to cater to varying needs of different regional and remote areas.

3 Regional Digital Infrastructure

NBN Co appreciates the concerns raised by the Commission in respect of digital infrastructure in regional Australia. In NBN Co's view, central to providing services to regional and remote Australia is the policy framework of universal service, both as it exists today, and how it might be delivered in the future.

3.1 Universal service

Universal access to a minimum level of retail communication services has been a long-standing policy objective within Australia. NBN Co believes that improvements in the way these services are delivered will be key to unlocking the capabilities of regional and remote Australia.

3.1.1 History of universal service in a changing industry

The Universal Service Obligation (**USO**), and related supplementary instruments regarding Payphones, Priority Assistance (**PA**) and the Customer Service Guarantee (**CSG**), give effect to the above policy objective and are based on ensuring consumers can access a Standard Telephone Service (**STS**) (i.e., a landline voice service) wherever they live or work. These obligations primarily apply to Telstra, the primary universal voice service provider, and were enacted at a time when the underlying national telecommunications infrastructure was a network built to deliver landline voice services – the Public Switched Telephone Network (**PSTN**).

Over the years, the use of the PSTN evolved to deliver data connectivity in several ways, leading to the widespread take-up of broadband services using Asymmetric Digital Subscriber Line (**ADSL**) technologies. Whilst some ADSL providers were able to deliver services over unbundled copper, most ADSL services were delivered as an add-on to a network that was designed and built around delivering voice services. This can be characterised as broadband delivered over a voice network.

The creation of the **nbn** network precipitated a fundamental shift in how the national communications network was to be deployed. In contrast to PSTN and ADSL, the **nbn** network is first and foremost a data network, with voice being one of many applications operating over it. The investment of $51 billion to date has enabled the delivery of high-speed broadband services right across Australia, the vast majority of which can support voice services that match or exceed the performance of traditional PSTN-based voice services. It is against the backdrop of this fundamental shift in the architecture of our national communications networks that NBN Co supports universal service reform, to move away from being STS-based.

3.1.2 Policy and regulation must evolve to remain fit-for-purpose

The process of adapting policy to the changed industry environment is well underway, with several significant changes made over the past few years.

The Universal Service Guarantee

The Universal Service Guarantee (**USG**), which was a reform to the USO framework made by the previous government, was a good first step towards universal service regulatory reform. It introduced the SIP regime to provide a wholesale broadband infrastructure guarantee to complement the existing voice service guarantee.

The SIP regime recognises the importance of broadband infrastructure and services, and guarantees their availability to all Australian premises. In addition, the obligation on SIPs operating fixed-line and fixed wireless networks to enable the supply of voice services demonstrates recognition of the shift towards broadband networks being used to provide voice (rather than legacy voice networks being used to provide broadband via ADSL technology).

In the case of satellite networks, while voice can be used over these networks, SIP providers delivering satellite services are exempt from the obligation to support voice services, due to issues primarily related to latency.[1]

While NBN Co is the default SIP for Australia, the SIP regime can place equivalent obligations on operators of competitive fixed line infrastructure in locations where they, rather than NBN Co, have built networks. Generally, this applies in areas of new development where a developer enters a contract with a carrier other than NBN Co to install telecommunications network infrastructure in the development. In these cases, that network operator is required to nominate as the SIP for the area and comply with the obligations set out in the SIP legislation.

NBN Co's role as the default SIP

NBN Co is the default SIP across Australia. This means NBN Co is required to connect premises to its network on reasonable request by an RSP on behalf of an end-user, and to supply wholesale broadband services, except in the limited geographic areas where there is another SIP (e.g., where a non-NBN Co carrier has contracted to serve a new development, and is required to nominate as the SIP for the project area).

NBN Co's role as the default SIP makes it the infrastructure provider of last resort in all areas where other carriers do not offer high-speed broadband services, a significant responsibility reflecting the considerable investment made by the Australian public in building the **nbn** network.

The **nbn** network uses a multi-technology mix (**MTM**), which matches the most appropriate technology to the local community based on population density, geography, and cost. The MTM

[1] As outlined in the Explanatory Memorandum to the *Telecommunications Legislation Amendment (Competition and Consumer) Act 2019*, p. 157.

uses fixed-line technologies to serve approximately 92 per cent of Australian premises, including Fibre-to-the-Curb (**FTTC**), Fibre-to-the-Node / Fibre-to-the-Basement (**FTTN/B**), Fibre-to-the-Premises (**FTTP**), and Hybrid Fibre Coaxial (**HFC**). Outside the **nbn** Fixed-Line footprint, approximately 8 per cent of Australian premises have access to the **nbn** Fixed Wireless or **nbn** Satellite network.

As the default SIP, NBN Co use its Fixed-Line, Fixed Wireless and Satellite networks to connect premises and provide wholesale broadband services across the country, including regional Australia. There are approximately 3.7 million premises located in regional Australia, around 72 per cent of which are within the **nbn** Fixed-Line footprint, with the remaining premises covered either by **nbn** Fixed Wireless or **nbn** Satellite.

Importantly, in **nbn** Fixed-Line network areas, Telstra complies with its universal service obligations by delivering voice services over the **nbn** network.

NBN Co role in the Regional Broadband Scheme

The **nbn** Fixed Wireless and **nbn** Satellite networks – which are used to meet NBN Co's SIP obligations outside the **nbn** Fixed-Line footprint, and are predominantly in regional areas – are loss-making and non-commercial:

- In 2015, the Department of Communications' Bureau of Communications Research (**BCR**) estimated that the net present value (**NPV**) loss for **nbn** Fixed Wireless and **nbn** Satellite services to FY2040 was approximately $9.8 billion, using a post-tax nominal discount rate of 6.46 per cent.[2]
- In 2020, using BCR's financial model and methodology, the Australian Competition and Consumer Commission (**ACCC**) prepared updated estimates of the financial losses associated with **nbn** Fixed Wireless and **nbn** Satellite networks. The revised estimated NPV of total expected losses (i.e., losses between 1 July 2009 and 30 June 2040) was $12.949 billion.[3]

The Regional Broadband Scheme (**RBS**), which was introduced at around the same time as the SIP regime, provides an industry cross-subsidisation mechanism for loss-making **nbn** Fixed Wireless and **nbn** Satellite networks. The RBS is a critical tool for funding essential broadband services in regional Australia provided over **nbn** Fixed Wireless and **nbn** Satellite networks, including coverage of historic losses.

The RBS requires NBN Co and other carriers to pay $7.45 per month (indexed annually by CPI) for each chargeable premises[4] on their superfast fixed-line networks. NBN Co is expected to pay approximately 95 per cent of the RBS, which it recovers through an internal cross-subsidy from wholesale services provided on its Fixed-Line networks, with other carriers expected to contribute the remaining 5 per cent (expected to be approximately $40 million per year).

[2] BCR, 'NBN non-commercial services funding options: Final report', March 2016.
[3] ACCC, 'Report on modelling of the Regional Broadband Scheme levy initial base component', October 2020, p. 15.
[4] Chargeable premises are premises supplied with a designated broadband service, for the whole or part of a month, by fixed-line infrastructure capable of providing 25Mbps or more.

Challenges for private providers

Commercial viability remains a key challenge of providing broadband infrastructure to more remote parts of Australia. As a SIP, the Government has used NBN Co as a vehicle to implement its telecommunications policy objectives, including in remote areas which the private sector might not find commercially attractive. Whilst large parts of regional Australia benefit from increasing infrastructure delivered by mobile and satellite operators, the commercial viability for servicing the more remote parts of the regional footprint is becoming increasingly marginal, as the Government continues to invest in regional Australia. For example, as the Mobile Black Spot Program (**MBSP**) moves through its lifecycle and coverage areas become increasingly remote, the commercial viability challenge increases. As the costs to serve the increasingly remote areas increases, the funding required to close the investment gap for the private sector will increase, as well as higher return on equity that private operators are likely to require to take on the additional commercial risks.

In particular, there may be a tension between allowing private participants to selectively pick (by tendering) specific areas to serve and the efficiency with which less commercial areas can be served.

Economies of scale are critical to development and deployment of telecommunications infrastructure, particularly across regional and remote Australia given the vast territory and sparseness of regional populations. At present, neither vertically integrated smaller providers nor bigger foreign players are likely to have on-ground service and support capabilities to adequately serve large or multiple parts of regional Australia. For example, the $750 million upgrade program for **nbn** Fixed Wireless, described further below, covers multiple large regional areas and would not be possible without the scale, size and expertise that an organisation such as NBN Co provides.

3.2 Ongoing investment will deliver universal voice-capable broadband networks

Enhancing capability and reach nationally through NBN Co's network investment program

Delivering broadband services across Australia and supporting communities to get the best out of their NBN connections remains core to NBN Co's purpose. To that end, NBN Co is continuing to invest in its Fixed-Line, Fixed Wireless and Satellite networks, including to enhance the services available in regional and remote areas of Australia.

In September 2020, NBN Co announced a $4.5 billion network investment program to advance the capability, reach and value of the **nbn** network nationally. Through this program, the company:

- Is delivering on-demand fibre upgrades for homes and businesses currently on FTTN or FTTC technology, as part of its 'Fibre Connect' program. Under this program, up to 2 million premises currently served by FTTN are expected to become eligible to upgrade to FTTP by the end of 2023, allowing them to access download speeds of close to 1Gbps. NBN Co has now announced the areas of the 2 million premises served by FTTN that will become eligible

to upgrade to FTTP, with around 45 per cent of these premises located in regional Australia. In October 2022, the Government confirmed it would supply NBN Co $2.4 billion in equity investment over four years to include a further 1.5 million premises in FTTN to FTTP upgrade programs, bringing the total to 3.5 million premises which will be Ultrafast-capable by the end of 2025.

- Is supporting the creation of **nbn** Business Fibre Zones across the nation, delivering the fastest business grade fibre – Enterprise Ethernet – to businesses across Australia at no upfront build cost to the customer's internet provider, and at the same wholesale prices as those in the city central business districts (when they order an eligible plan). Of the 304 **nbn** Business Fibre Zones, 127 are located in regional Australia, enabling approximately 315,000 businesses to access Enterprise Ethernet in non-metro areas.
- Has established a $300 million co-investment fund to further enhance broadband services for regional and remote households, businesses, and communities. The primary focus of the Regional Co-Investment Fund (**RCIF**) is to leverage government funding programs to increase the number of premises that can access technologies that support higher speeds. Not only will this help meet the growing and diverse needs of people living and working in regional areas, but it will also deliver long-term social and economic benefits to regional and rural Australia.

Delivering better services for regional Australia with NBN Co's fixed wireless upgrade

During FY22, NBN Co made good progress on enabling access to fast and reliable broadband services in regional and remote communities. This included the delivery of investments to help manage capacity and performance on the fixed wireless network, and improvements to Sky Muster Plus, which allow homes and businesses to access unmetered data for essential online activities.

The current Government has committed to contributing a $480 million grant toward a $750 million investment in NBN Co's fixed wireless network to deliver faster speeds for regional Australia, following previous consideration of a rigorous business case. This $750 million investment addresses issues raised by the 2021 Regional Telecommunications Review. One of that review's key findings was that there was increased ongoing demand for data in regional, rural, and remote areas covered by fixed wireless networks, and that such demand was not always being met, causing network congestion issues. The review also found that satellite users had insufficient data allowance. It recommended enhancements to the **nbn** Fixed Wireless network to allow faster speeds and greater capacity, as well as the extending the reach of the Fixed Wireless network into more satellite-only areas.

As a result of the funding:

- NBN Co will add the latest 5G technology to its existing 4G network in order to cover more than 2,200 fixed wireless sites and more than 22,000 cells in peri-urban, regional, rural and remote areas of Australia. Many **nbn** Fixed Wireless sites will have their coverage enhanced

and the fixed wireless footprint coverage will be expanded by up to 50 per cent, enabling around 120,000 former satellite-only premises to access **nbn** Fixed Wireless services.

- The fixed wireless network improvements are expected to allow NBN Co to implement a new measure to indicate the network's capability to achieve 'typical wholesale busy period speeds' of at least 50Mbps (download).
- NBN Co is aiming to enable eligible homes and businesses in the expanded footprint to access potential maximum wholesale download speeds of up to 100 Mbps. NBN Co further intends that up to 85 per cent of the expanded fixed wireless footprint will be able to order services with potential maximum wholesale download speeds of up to 250 Mbps, which is up to three times faster than currently available on **nbn** Fixed Wireless services.
- **nbn** Satellite customers, recently saw enhancements to their **nbn** Sky Muster Plus services, with unmetered data increasing to 16 hours per day. In addition, because some existing **nbn** Satellite customers will move to the Fixed Wireless network, this will free up capacity on the satellite network to the benefit of those customers remaining within the satellite footprint.

Improving regional digital connectivity through NBN Co's participation in the Regional Connectivity Program

In addition to the network investment programs outlined above, NBN Co has successfully participated in the Federal Government's Regional Connectivity Program (**RCP**), which is a competitive grants program to fund the delivery of 'place-based' telecommunications infrastructure projects for improving digital connectivity across regional, rural, and remote Australia:

- Under Round 1 of the RCP, 18 **nbn** projects in regional, rural, and remote areas of Australia were approved for more than $35 million in RCP funding, with NBN Co contributing almost $29 million towards the projects as part of its continued commitment to providing regional Australians with access to high-speed broadband. Government co-funding is necessary to make the business case viable over a reasonable time period. Each of these Round 1 projects involved changing the **nbn** access technology available in the project area from fixed wireless or satellite to FTTP.
- Under Round 2 of the RCP, NBN Co is expected to deliver new projects focusing on areas of high economic and / or social value that are outside the **nbn** Fixed-Line footprint, where better connectivity and increased data can have a clear benefit to the local region. Some of the successful projects include **nbn** Fixed Wireless and Satellite broadband upgrades, with NBN Co awarded almost $35 million in Federal Government co-contributions to help deliver a further 10 projects. The projects will deliver enhanced connectivity to around 4,000 homes and businesses over the **nbn** network including in some of the most remote areas of Australia, with more than 1,400 of these being in northern Australia. For example, the coastal town of Onslow in the Pilbara region of Western Australia has seen its economy transition from wool-driven to tourism, and now to being an ideal access point for Coral Coast activities, including scuba diving on the reefs offshore from town. This project will see

the **nbn** access technology in Onslow change from the **nbn** Sky Muster satellite service to FTTP, helping to strengthen the town's resilience to natural disasters, such as cyclones. At the same time, the rapid adoption of smart technology has resulted in changing expectations and requirements for visitors. NBN Co will invest $11 million, with a further $4 million from state and local governments.

NBN Co notes this program awarded funds widely and across multiple providers and technologies, following what it observed to be an open and transparent process.

Providing metro-comparable services anywhere in the country by potential advancements in satellite technology

Technological advancements in satellite networks, such as that discussed in the Interim Report, also promise to extend the reach and capability of high-speed data services far beyond that which could have been anticipated when the USO first came into being. Developments in the capabilities of Low Earth Orbit (**LEO**) satellite constellations over the next few years will allow end-users to access metro-comparable services anywhere in the country, indeed anywhere in the world, including the ability to support 'fixed-like' voice capabilities.

The enormous capital expenditure required for these LEO constellations is unlikely to be provided by individual governments to serve individual countries, but by corporations based on global business cases. This would potentially allow remote consumers all over Australia to be served by these LEO networks, either directly or via existing domestic carriers who have local workforces who can install and support services, or potentially with a government funding model that simply offsets some of the end-user costs of satellite equipment / monthly rental to maintain nationally averaged pricing. Such a model would represent a significant shift away from existing funding models which are built on the basis that regional and remote networks are invariably non-commercial and that funding is required even to consider building and operating networks in these areas.

NBN Co is cognisant that, at this stage, it is not clear whether LEO satellites will be suitable or affordable on a large enough scale to address the needs of all regional customers. This is reflected in the mixed reception to LEO satellites in other jurisdictions. For example, the US Federal Communications Commission recently rejected SpaceX's Starlink network as a viable provider of broadband services under the US's universal service fund citing doubts on the maturity in the technology and ability deliver affordable high-speed broadband in line with the US government's universal service goals.[5] Meanwhile, the Canadian government has entered into a $600m capacity agreement with Telesat to acquire dedicated capacity on their LEO network once it is operational to provide coverage to regional and remote parts of Canada.

Additionally, the ongoing economics of LEO networks are yet to be tested at scale. LEO satellites do not have an indefinite life span and require a degree of regular replacement (current business cases

[5] Federal Communications Commission, 'FCC Rejects LTD Broadband, Starlink Bids for Broadband Subsidies', 10 August 2022. Accessed 28 September 2022 <https://www.fcc.gov/document/fcc-rejects-ltd-broadband-starlink-bids-broadband-subsidies>.

put forward by private providers suggest that that technology may need to be replaced every five years).

Despite these challenges, LEO satellite networks have the potential to fundamentally change the way universal service (both voice and high-speed broadband) can be delivered in regional and rural parts of the country, and their development deserves close attention from industry and policy makers over the next few years.

3.3 Universal voice beyond fixed-line and fixed wireless must be careful and considered

Universal service policy should continue to focus on ensuring that telecommunications services are available to people wherever they live or work, are delivered to an acceptable standard to support high-speed data and voice and are affordable for consumers including those on lower incomes.

While these universal service policy objectives remain appropriate, the mechanisms through which they are achieved will require reform that takes account of the current and future technology landscape, including the need for and availability of broadband infrastructure, the provision of voice services over that infrastructure (both fixed and mobile), and the reforms implemented through the introduction of the SIP regime.

It would seem a good time to consider what policy settings would allow a transition from the existing technologies and regulatory regime to a future state. Telstra has a copper continuity obligation (**CCO**) that runs until 2032 and retains the voice USO, while NBN Co's existing Sky Muster satellites also do not reach end of life until 2032.

Next steps for policy consideration

To assist the Commission and the Government more broadly, NBN Co suggests the following key policy questions that need to be resolved while developing a revised approach to delivering universal service:

1. How may market developments and emerging technologies affect the way universal service could be achieved?
2. How to ensure fit-for-purpose voice services can be delivered to end users in satellite-only areas?
3. To what extent are universal voice services likely to be delivered by one or more networks if legacy requirements (e.g., for copper continuity) are relaxed?
4. Where non-commercial obligations remain essential to delivering universal service, what are the best mechanisms for selecting and funding the required infrastructure and / or services?

4 Cyber Security

NBN Co supports the Productivity Commission's desire for development of consistent and robust legal and regulatory approaches to technology policy, including cyber security, across government, business, and civil society to produce outcomes that advance economic growth and balance the national interest.

NBN Co shares the Commission's concern surrounding the relatively lower take up of cyber security software and practices among small and medium enterprises (**SMEs**).[6] The need for greater take up is particularly acute given SMEs make up more than 90 per cent of the Australian economy.[7] NBN Co sees itself as playing an important role as a digital infrastructure provider in helping to educate this segment on emerging cyber risks and practices which may assist in their mitigation. At present, NBN Co works closely with several security partners (including eSafety and the Australian Cyber Security Centre) to increase the security posture and cyber resilience of the community at-large. As part of this, NBN Co has a comprehensive annual multi-channel approach, with flagship campaigns each year, including Privacy Awareness Week, Safer Internet Day and Scams Awareness Week. These campaigns and NBN Co's community ambassadors reach hundreds of at-risk individuals and diverse community groups each quarter to improve their cyber-awareness and this contributes positively to SME uplift.

NBN Co also supports government research projects to help uplift the cyber security resilience of SME across Australia. One such recent report was produced by the Cyber Security Cooperative Research Centre (CSCRC), in collaboration with CyberCX and CSIRO's Data61, and supported by the Government of South Australia and the Australian Cyber Security Centre (ACSC). This report outlines a cross-jurisdictional blueprint to help government implement scalable and practical initiatives to support SME cyber security uplift and policy makers prioritise areas of importance for SME cyber security uplift. NBN Co supports, as far as reasonably practicable, a voluntary and principles-based approaches to cyber security policy. Across Australia at both the Federal and State / Territory level, there are multiple and sometimes conflicting cyber security standards, policies, and guidelines.

Regulatory harmonisation should be a priority to reduce barriers for cyber security uplift across the whole-of-economy. If regulation is deemed to be appropriate, a risk-based approach can provide SMEs and large organisations more flexibility in how they implement regulations by reducing the cost of compliance, and allow business to assist their own risk profile, technology adoption and allocations of resources to uplift its capabilities. This approach would build in a culture of resilience and allow businesses to adapt alongside technology advances. Government can support business by providing coordinated policy advice that has practical outcomes attached.

[6] Interim Report pp. 71–72.
[7] Cyber Security Cooperative Research Centre, 'Small but Stronger: Lifting SME Cyber Security in South Australia', January 2022, p. 3.

NBN Co recognises and supports the Government's efforts to keep pace with the international regulatory environment to ensure cyber security policy and the related capabilities are interoperable with like-minded countries.

5 Greater Regulatory Coordination

NBN Co is supportive of the Interim Report's Recommendation 3.6. NBN Co considers improved regulatory coordination should harmonise existing regulations and maintain this principle when considering the adoption of any new regulations. This approach would increase coordination and the sharing of information, between the government agencies with responsibility for digital, data and cyber security. Increased coordination will only be successful if the government agencies adopt mechanisms to facilitate the of streamlining of reporting requirements, such as a single online interface, into the ACSC. In particular, this would improve timely bi-directional threat sharing information between Industry and the ACSC. As the ACSC provides industry advice to regulated and non-regulated entities this would allow all Australia businesses to have clarity and access to authority for advice.

6 Conclusion

NBN Co is grateful for the work of the Commission in respect of digital productivity, and for the opportunity to make submissions on these issues. As technology continues to emerge and Australians' usage of it changes, it is critical that policy remains fit for purpose: delivering for Australians wherever they are.

If the Commission would like to discuss these issues further, please contact Sarah Alderson (General Manager, Regulatory Affairs)