

27 January 2017

Mr Paul Lindwall
Commissioner
Telecommunications Universal Service Obligation
Productivity Commission
Via: telecommunications@pc.gov.au

Dear Mr Lindwall

The Rural, Regional and Remote Coalition is a unique alliance of sixteen volunteer-run organisations and advocacy bodies that are concerned about a lack of connectivity in the bush. The coalition was formed to raise awareness of the important role connectivity has in regional Australia. The following letter is provided in response to the Telecommunications Universal Service Obligation Draft Report, which outlines our common position. Individual organisations will also be providing their own submissions on the Draft Report.

Regional, rural and remote consumers and businesses need legislative rights to access broadband data and voice services. The service should be set out in a technology neutral manner and updatable to ensure that the service meets consumer, business and productivity needs now and into the future.

Recommendation: Wherever Australians work and live, they should have guaranteed minimum access to data and voice services, which includes upload speeds and other features specified for existing and future residential, agriculture, health and education applications.

There should be no degradation in the current voice service that users receive. The delivery of voice services needs to be clearly articulated, with the Universal Service Obligation and Copper Continuity Obligation remaining until a suitable alternative arrangement is in place.

Recommendation: nbn Sky Muster does not provide an adequate baseline voice service and should not be relied on to deliver the USO. Any alternative voice services considered should ensure national equity in the standard of service delivered.

Consumers using Sky Muster satellite services are most likely to have no other reliable broadband communication options. Furthermore, for many of these consumers there are a number of additional needs, such as running multiple businesses from the premises, educating children, and housing a number of employees. It is vital therefore that the limited resources meet the needs of consumers. The sustainability of these services needs to be ensured into the future. Heavily utilised beam areas require the use of alternative technologies to ensure the capacity is not over used.

Recommendation: Limited capacity on Sky Muster satellite will not meet baseline broadband needs in a short timeframe. Additional and alternative technologies are needed to ensure services continue to meet consumer and business needs.

Ensuring safeguards are reformed so they are relevant to the needs of consumers is vital. Connection and repair timeframes, reliability, adequate performance levels and safeguards for vulnerable

consumers need to be re-examined and updated. Services should be delivered equitably to all Australians. Any proposed changes to telecommunication services should be conditional on comprehensive performance and service guarantee replacements that apply to the new services. The Minister of Communications and Arts should ensure that there are clear standards, benchmarks, accountability and clarity around wholesale (e.g. nbn) and retail provider responsibilities.

Recommendation: Updated telecommunication service guarantees and adequate performance to reflect the needs of consumers and businesses needs to occur as soon as possible.

Expansion of mobile coverage is critical in regional and rural areas. Current and previous programs have resulted in further coverage. However, there remain premises, vital community areas and high traffic areas that are at risk from having no mobile coverage. Continuation of publically funded mobile network expansion, through the Mobile Black Spot program or similar, on the condition that the technology can be used by all network providers, needs to be guaranteed and funding committed. As expansion is required into more remote areas the funding and conditions required to meet community needs will require increased flexibility from the program.

Recommendation: An ongoing minimum commitment to spend \$60m each year on the Mobile Black Spot Programme, or an equivalent program, which prioritises community identified areas and open access facilities. The program should have more flexible terms and conditions to address areas where co-investment is not achievable.

Yours sincerely,

Rural, Regional and Remote Coalition

