

Submission
to
Telecommunications Universal Service Obligation Inquiry

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The Commission is seeking submissions by **21 July 2016** for consideration for its draft report.

To:

**Telecommunications Universal Service Obligation Inquiry
Productivity Commission
GPO Box 1428
CANBERRA CITY ACT 2601**

www.pc.gov.au/inquiries/current/telecommunications

Submission made on behalf of:

Yaraka Isisford Branch of the Isolated Children's Parents' Association.

<http://www.icpa.com.au/branches/view/65/yaraka-isisford-qld>

Submission written by:

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(Assisted by Branch Members who wished to contribute)

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ICPA (Aust) is a voluntary, non-profit, apolitical parent body dedicated to ensuring that all rural and remote students have equity of access to a continuing and appropriate education. ICPA members Work together for equity of access to education for all students who live in rural and remote Australia

It is essential that geographically isolated students and their families are provided with a terrestrial telephone service that works, works all the time, and, if it fails, is repaired promptly. The focus of this submission will be on the importance of the continuing provision of a terrestrial telecommunications service under-pinned by a USO and a CSG.

**This submission contains no material supplied in confidence and may be placed on the
Productivity Commission's website**

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to

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INFORMATION REQUEST — THE CURRENT USO

Who are the main groups of users of USO standard telephone services and payphones?

The majority of members of the Yaraka / Isisford Branch (Y/I B) of the Isolated Children's Parents' Association (ICPA) rely on the USO standard telephone service for the majority of their communication needs. The area in which we live is geographically isolated and access to a reliable terrestrial service for education, business and personal needs is essential. There is currently no access to a mobile telephone service. Yaraka has been listed to receive a mobile telephone tower under the Coalition Mobile Black Spot Programme but this service will not be available to all branch members who reside in the area.

The provision of a payphone in geographically isolated towns, especially where there is no mobile coverage, is essential. Access to payphones enables residents, workers, travellers and tourists to maintain contact with family and emergency services if necessary.

Aside from the rollout of the NBN, what are the major factors affecting the use of USO standard telephone services?

The major factor affecting the use of the USQ standard telephone service by members of the Y/I B is that this service is their life-line to everywhere else – education, business and personal communications all rely on a standard telephone service. The majority of branch members do not reside within a mobile telephone service footprint.

What will be the impact of the NBN rollout on the provision of USO standard telephone services, particularly once the NBN rollout is completed?

The completed roll-out of NBN will have little or no impact for Y/I B members as they will still be reliant on a Legacy telephone system and it is essential that the USO and CSG remain in place so that these people can be guaranteed that when their telephone system stops working it will be repaired within a guaranteed time frame and that compensation will be available if it is not.

What are the main benefits ~~and costs~~ of the current USO?

“The USO also ensures access to the standard telephone service for people who cannot communicate using voice telephony because they are deaf or have a hearing or speech impairment. The obligation requires that an equivalent means of communication be provided, including appropriate customer equipment to enable equivalent access. For example, communicating by text using a teletypewriter (TTY) or modem is a form of communication considered to be equivalent to voice telephony.

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To enable text and voice telephony users to communicate with each other, the National Relay Service (NRS) was established to assist text-to-voice and voice-to-text translation. The NRS enables access to the telephone network through the relay of modem, TTY or one-way voice communications.

The right to a standard telephone service under the USO includes the provision of a standard telephone handset if requested, but additional costs apply. If customers have an impairment associated with hearing, speech, vision, dexterity or mobility, the obligation extends to the provision of equivalent forms of telephone equipment, such as volume control or hands-free phones and TTYs.” (1) ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

Additionally, the USO requires carriers to provide a fixed telephone service to any permanent location in Australia at a cost that does not exclude subscribers who reside in that area from accessing the service.

How effective is the current USO in meeting its objective of being ‘reasonably accessible’ to all people in Australia on an ‘equitable basis’, wherever they reside or carry on business?

The current USO is effective in the provision of services but could be greatly improved in terms of:

- 1) acceptable time frames for fault repair
- 2) Remuneration available when faults are not repaired on time.

“The provision of data should be covered by a data USO with nbn as the supplier.” (Branch Member No 1)

“The data plans available on the nbn Sky Muster satellite should reflect the real world usage required to successfully conduct education, business and domestic activities. This data allocation should be equitable in price and volume when compared to that which is available to the majority of the Australian population. The current allowances do not adequately meet existing, let alone future, requirements.” (Branch Member No 2)

“When the internet is too slow to do banking and business (with dropouts before transactions etc. are completed) I feel it is very poor. We are all business owners and operators, but it is difficult if we aren't allowed to have proper access to appropriate technology which most of the people in Australia have access too.” (Branch Member No 6)

“Current CSG payments for service interruptions are inadequate. Subscribers can wait for as long as several weeks before faults are rectified, and this appears to be an increasing trend. CSG payments are a small consolation for the financial costs to business, the interruption to education, the stress of being isolated in an emergency and the lack of access to the Royal Flying Doctor Service. Payments should increase exponentially with fault duration or

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recurrences of the same fault.” (2) ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

INFORMATION REQUEST – OTHER CURRENT POLICIES AND PROGRAMS

What other current government policies and programs interact with the current USO or may be seen as acting as a substitute for the USO?

There appear to be no other current government policies and programs interacting with the current USO or may be seen as acting as a substitute for the USO which are available to residents of geographically isolated areas.

INFORMATION REQUEST — RATIONALES AND OBJECTIVES

Are the underlying rationales for the current USO still valid in today’s evolving telecommunications market?

“Suggestions that the USO is no longer necessary because of mobile phone availability, advanced technology and the nbn ignore the reality of the technological chasm experienced by residents of isolated areas. Together with the aging population, the increased percentage of Australian students living with a disability or impairment only enhances the need for the provision of a guaranteed telecommunications service suitable for their needs.” (3) ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

Can the NBN be treated as an alternative (wholesale) USO service?

“Only high latency nbn services supplied by satellite will be available in regional & remote areas. These high latency services are unsuitable for Public Switched telephony services.” (Branch Member No 1)

What is the justification for funding two sets of infrastructure (the NBN and the current USO standard telephone service) in the highest cost areas?

The NBN will not provide an acceptable telephone service to those who reside in geographically isolated areas.

The provision of funding for two sets of infrastructure can be justified because the NBN will provide (we hope) access to efficient and affordable data speeds and plans but not to an acceptable telephone service.

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What evidence is there to support the rationales?

“We feel that the USO is essential, as we are, and will remain, well outside any mobile phone area, leaving us wholly reliant on the current phone system for emergency contact. As my eighty-two year old mother still lives on the property, and has previously suffered two strokes, the ability to make telephone contact with doctors and emergency services is crucial. We also have a young family, so again phone contact is essential in case of accidents, as well as for their education, as the telephone is utilised every day for a minimum of three hours a day in lesson delivery by their teachers.” (Branch Member No 3)

For example, are changes in technologies reducing the costs of providing telecommunications services in regional and remote areas?

“A Technology which will meet the requirements for remote area communications could include making use of the mobility services using Wireless Local Loop Technology for fixed phones thus making the provision of more mobile towers more viable. However a mobile telephone tower cannot be economically run without mains power, limiting their introduction in remote areas of Australia. For **safety of life**, education, business and social interaction, a reliable telephone service is essential and this cannot be provided for the majority of Australia using mobility services at this stage.” (Branch Member No 1)

To what extent are there market-based alternatives to the delivery of universal services through the current USO?

There are NO market-based alternatives to the delivery of universal services through the current USO for people who reside outside of the handheld in building mobile telephone service footprint.

What evidence is there to support social or equity based rationales?

Support for social and / or equity based rationales is evidenced by the need to provide services for those members of Australia’s population who reside in geographically isolated areas. Much has been said in recent years about “population drift” away from inland areas towards the coast.

“People need services and if such services are not available, they will not come to live and work in such areas and if they do come, they will not stay. This cohort of the population is reliant on the existing terrestrial service for personal, education, business and personal needs. Members of the Y/I B who reside in Legacy telephone service areas with no access to NBN (other than satellite), mobile telephone coverage must have their telecommunications service subsidised by Government and other communication service providers” (Branch Member No 1).

What should be the objectives of any new universal services policy?

“For the many occupants of Australia who have no mobile coverage, a mandated right to a fixed telephone service and a reliability guarantee is essential.” (4) ICPA Qld Inc. USO Position

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Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

Additionally any new USO Policy should contain the following objectives:

- Subscribers who have a disability or impairment should be guaranteed the right to the provision of a telephone service which will meet their needs.
- Any persons wishing to become new subscribers should be guaranteed a telephone connection
- Provision needs to be made for appropriate increases in CSG payments made when services are interrupted.
- CSG payments should increase exponentially with fault duration or recurrences of the same fault.
- A stipulated minimum data speed which adequately meets the needs of education delivery should be mandated and such a mandate should be enforced.

Are objectives such as universal availability, affordability and accessibility appropriate?

Objectives such as universal availability, affordability and accessibility will only be appropriate provided that such objectives take into account and cater for the unique nature of communications in geographically isolated areas. The residents of such areas (which include the majority of the member of the Y/I B) must not be ignored when such objectives are being framed.

INFORMATION REQUEST — BROAD POLICY OPTIONS

What policy options should be considered in addressing universal services objectives?

“Equitable provision of telecommunications to all residents in Australia no matter where they live.” (Branch Member No 1)

Could the ‘optimal’ policy option for Australia be no USO?

The ‘optimal’ policy option for Australia could ABSOLUTELY NOT be no USO.

The inhabitants of less populated areas of Australia (including the majority of members of Y/I B) would be severely disadvantaged as the provision of service to these people would fail the majority of commercial business cases.

This can be clearly demonstrated by the need for Government assistance to fund Black Spot Mobile phone programmes.

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There has to be a USO policy to enable provision of these services and projects which would fail any commercial bench mark.

INFORMATION REQUEST — SCOPE

What types of services should be included in any universal services policy?

“For the many occupants of Australia who have no mobile coverage, a mandated right to a fixed telephone service and a reliability guarantee is essential.” (5) USO ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

Additionally any new USO Policy should mandate the following services:

- Subscribers who have a disability or impairment should be guaranteed the right to the provision of a telephone service which will meet their needs.
- Any persons wishing to become new subscribers should be guaranteed a telephone connection
- Provision needs to be made for appropriate increases in CSG payments made when services are interrupted.
- CSG payments should increase exponentially with fault duration or recurrences of the same fault.
- A stipulated minimum data speed which adequately meets the needs of education delivery should be mandated and such a mandate should be enforced.

Should current USO services — the standard telephone service and payphones — continue?

“ICPA (Qld) Inc. view the USO as absolutely essential, given the reliance on fixed phones across so much of Australia. While ICPA (Qld) Inc. welcomes the opportunity to argue for a much improved minimum standard, it is imperative such a standard is legislated. Suggestions that the USO is no longer necessary because of mobile phone availability, advanced technology and the nbn ignore the reality of the technological chasm experienced by residents of isolated areas. Together with the aging population, the increased percentage of Australian students living with a disability or impairment only enhances the need for the provision of a guaranteed telecommunications service suitable for their needs.” (6) USO ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

If not, what alternatives to these services should be considered?

Should an alternative to these services be considered, it is essential that any such alternative does

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not leave rural, remote and geographically isolated subscribers disadvantaged.

“ICPA (Qld) Inc. believes technology has not yet provided an alternative to a USO mandated fixed telephone service for rural, remote and isolated subscribers. Given the current demographic trends in rural, remote and isolated areas, the retail market for relevant services will not deliver appropriate outcomes for consumers unless such retail service providers are required by legislation to do so.” (7) USO ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

Given the ubiquitous nature of mobile services, should fixed line services remain the focus of the USO?

“We also consider the USO an essential service at our property that does have mobile coverage as it is in an isolated area and the mobile service can only be utilized on most occasions when standing at certain spots. Most of the inside of the residence has very poor or no reception.” (Branch Member No 4)

Given emerging market, technological and policy developments, what areas of market failure should be targeted by any new universal services policy?

Any new universal services policy needs to be robust and service providers need to be held accountable. Judging by the negative experiences encountered by some members of Y/I B in relation to the repair of faults, it would appear that one area of market failure is accountability of service providers. It is also essential that any new universal services policy does not exclude subscribers in rural, remote and geographically isolated locations.

Should there continue to be a voice services safety net for particular user groups and, if so, what would be the best approach to providing this?

There should there continue to be a voice services safety net for particular user groups.

A desirable approach to providing this: “The provision of fixed services using mobile technologies will provide a service which will meet the requirements for remote area subscribers. A terrestrial based USO service which can be fed by a number of technologies including radio services and mobile technologies.” (Branch Member No 1)

Which particular user groups (for example, Indigenous communities) and locations (for example, remote locations) should be targeted by any universal services policy?

“We run two properties, one falls within a mobile phone area and the other does not. The one that is not in a mobile phone area is very isolated and the only means of communication is the current

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phone service. There is no possibility that mobile coverage will ever be available in this area so for us the USO is an essential service both for communication to the outside world and more importantly for emergency contact in the event of serious illness or accident.” (Branch Member No 4)

What are the telecommunications needs of these particular groups?

Due to geographic isolation and no access to the mobile telephone service footprint, the telecommunication needs of the majority of members of Y/ I B are almost 100% reliant on the terrestrial, fixed telephone network. This network is used for **SAFETY OF LIFE**, education, business and personal requirements.

It is essential that the terrestrial network continues to be maintained and that such maintenance continues to be underpinned by a USO and CSG.

“Suggestions that nbn’s satellite service will replace the need for the USO are disappointing. For residents of the tropics, nbn has estimated service outages or significantly diminished performance of at least ten days per year because of weather conditions. This satellite does not have the ability for telephony without significant time delay (latency) which would impede all calls, but particularly degrade communications in a school of distance education class environment.” (Branch Member No 5)

“If a telephone service is provided by attaching a Voice Over Internet Protocol (VOIP) service to the nbn satellite and the satellite equipment in the subscriber’s home the current repair time target is two weeks. If the subscriber lives on an island it can be up to 90 working days before the fault may be fixed.

In addition, a satellite service is at the mercy of weather and nbn have advised that they would expect, in the tropics, ten days per year of nil or degraded service. This would be at the times of the year where a telephone is essential. Basically it is likely to be not working when it is most needed.

When VOIP is used in a low latency situation it is quite an acceptable form of public switched telephony. The nbn wireless service is low latency.” (Branch Member No 1)

Should telecommunications users in regional and remote locations reasonably expect exactly the same service quality and price (including usage) as those living in cities irrespective of the cost of provision?

Of course telecommunications users in regional and remote locations should reasonably expect exactly the same service quality and price (including usage) as those living in cities irrespective of the cost of provision. Nowhere in the Australian Constitution is this cohort of citizens excluded and nor should they be, especially when it comes to telecommunications. Reliable telecommunications comes back to three words: “**SAFETY OF LIFE.**” telecommunications users in regional and remote locations pay income tax using the same structures and provisions as the rest of the Australian population, are expected to abide by the same laws and statutes and should not be discriminated against when it comes to the provision of appropriate telecommunications services.

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What should be the criteria for the inclusion or exclusion of particular telecommunications services, user groups and locations?

“We would consider the USO to be potentially extinguished in a geographical area if there is **100% hand held, in-building mobile coverage.**” (Branch Member No 1)

INFORMATION REQUEST — QUALITY

How should the benchmark for minimum standards of quality be set for universal services?

The benchmark for minimum standards of quality set for universal services should be the provision of a guaranteed terrestrial based telecommunications network and the guarantee that should this network fail, that it will be restored promptly and that fair and equitable compensation will be available to those subscribers who could not conduct education, business or social requirements while the network was not working.

Are existing consumer protections applicable to telecommunications services provision reasonable?

Existing consumer protections applicable to the provision of telecommunications services with regard to mandated fault repair and restoration times SHOULD be reasonable. However the reality is that faults are NOT being repaired in a timely manner across large areas of outback Queensland including the area in which members of Y / I B reside.

Levels of compensation offered under the current CSG are inadequate and should be reviewed with the objective in mind to increase such compensation payments to a more realistic and acceptable level.

Should consumer protection requirements be replaced or supplemented by transparent reporting by retail service providers?

Consumer protection requirements need to be robust and transparent reporting by retail service providers should be enforceable by law.

Such reporting needs to contain sufficient depth that unacceptable time delays and repeated rescheduling of appointments to effect repairs (especially in rural and remote and geographically isolated areas) are not cleverly concealed in “average” repair time statistics which also include data for urban locations.

INFORMATION REQUEST — UNIVERSAL SERVICE PROVIDERS

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How should universal service providers be determined?

“Universal Service Providers must have the ability to provide and maintain services in a timely manner in a way which meets community expectations.” (Branch Member No 1)

Should there be competitive tendering for the provision of services?

“Yes, tenders should be issued to ensure the best possible outcomes, while ensuring the technologies used are suitable for purpose.” (Branch Member No 1)

Should a provider of last resort be designated and if so, on what basis?

“Yes, as the provision of services in non-commercial high cost areas would not be attractive to the bulk of suppliers.” (Branch Member No 1)

What incentives are required to ensure that a provider of last resort operates at minimum cost?

“The last resort operator should be reimbursed for the actual cost of providing the service plus a fixed margin to cover the project. The last resort operator should also be assured of a reasonable profit margin.” (Branch Member No 1)

Is imposing reporting requirements on universal service providers as to who uses the services technically feasible?

“The end recipient of any USO service should be identified.” (Branch Member No 1)

What, if any, requirements should apply to all service providers?

- restoration and repair of faults in a timely manner
- guaranteed affordable installation of new services
- appropriate compensation paid to subscribers in the event that the above do not happen
- transparent and enforceable reporting mechanism
- no discrimination based on location of subscriber

INFORMATION REQUEST — OTHER POLICY ISSUES

How might technological neutrality be implemented under any new universal services policy?

“There should be a requirement that the technology is terrestrial based or if satellite is considered all call classes are limited to single hop working.” (Branch Member No 1)

How frequently should any universal services policy be reviewed, particularly given rapid changes in technology?

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“USO policy should be reviewed every 5 years.” (Branch Member No 1)

What other issues should be considered with respect to universal services policies?

“Some telephone services are provided in isolated areas utilising satellite, namely Telstra’s USO-Sat. This is provided as a standard USO service. This satellite service has the ability to operate as a “single hop” system when calling between other USO satellite users. This technology allows calls to be routed directly via the satellite eliminating the need to double hop. This minimises the effect of latency or delay inherent with geostationary based satellite systems. This technology is only possible if all of the users are on the same satellite.” “(or on the same spot beam – Branch Member No 1)”

“The nbn Sky Muster satellite system does not incorporate this technology so all Voice Over the Internet Protocol (VoIP) satellite to satellite calls will double hop and will therefore have latency issues. While single hop is not currently a requirement of a compliant USO satellite service, ICPA (Qld) Inc. believes that it should be.” (8) ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

INFORMATION REQUEST — FUNDING

How should the costs of delivering universal services be determined or benchmarked, and by whom?

As the end-user of universal services, members of Y/I B are of the opinion that how and by whom the costs of universal services are determined and whether or not such costs are benchmarked is an issue for government to consider. Telecommunications are an essential service and therefore should be funded appropriately.

Who should pay for the costs (and wear the regulatory burden) of delivering universal services?

Funding for the USO should continue to be sourced by a levy on all providers of a telephone service in Australia, e.g. Optus, Telstra, Vodafone, etc.

“The regulatory burden should be the responsibility of the Government or independent regulator.” (Branch Member No 1)

Is it reasonable that telecommunications users in regional and remote locations do not bear more of the actual infrastructure costs of providing telecommunications services?

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Yes, it is very reasonable that telecommunications users in regional and remote locations **do not** bear more of the actual infrastructure costs of providing telecommunications services.

Unless the plan is to de-populate rural, remote and geographically isolated areas by forcing the population to move to areas where such services remain affordable then, given the high cost of provision of such services, of course telecommunications users in regional and remote locations should not have to bear more of the actual infrastructure costs of providing telecommunications services.

What should be the main mechanisms used for funding the delivery of universal services?

Specific funding for the telecommunications USO is currently provided by a levy on all providers of a telephone service in Australia, e.g. Optus, Telstra, Vodaphone, etc.

This levy should remain in place and should be reviewed from time to time to ensure that it is sufficient to meet the financial demands of the USO.

What is the role of government in funding social policy objectives?

“In funding social policy objectives, the role of government must be to ensure that telecommunication access costs must be affordable and equitable with a comparable service in higher populated areas.

Remote high cost radio Bush phone users (located in the “bush”) require a reasonable and capped network extension installation charge. This charge must pass the test of being reasonable so as not to exclude people from obtaining a phone service.” (Branch Member No 1)

What should be the basis for determining any industry levy?

Any industry levy should be determined in a manner which ensures that it provides a meaningful contribution. Given the heavy population density in areas other than rural, remote and geographically isolated, it is reasonable that telcos which provide Telecommunication services to the Australian population will also contribute to any industry levy.

How should any user co-payment for services be determined?

“The dependence on reliable Telecommunication services increases with geographic isolation. Over 70% of Australia’s landmass has no mobile coverage. Coupled with this, inhabitants of rural and remote areas often have no regular face-to-face access to services, and rely on telephone and data services for health, education, business and social needs.” (9) USO ICPA Qld Inc. USO Position Summary.pdf

<https://dl.dropboxusercontent.com/u/80766382/Special%20Mail%20Outs/ICPA%20Qld%20Inc%20USO%20Position%20Summary.pdf>

The above information clearly demonstrates that there should be **NO** user co-payment for

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services.

Should there be means testing for users to access universal services?

Absolutely not – if those subscribers for whom the USO and CSG represent SAFETY OF LIFE were provided with an alternative means of telecommunication (which is not going to happen any time soon), then MAYBE they would not be 100% reliant on the USO and CSG.

“However, with current technologies, diverting USO funding to expanding the mobile service would not achieve total coverage in our lifetimes.

Round one of the Mobile Black Spot program will fund 499 sites for a cost of \$374.05 Million, or an average cost of \$749,600.00 per site.

This will increase handheld coverage by 68,600 square kilometres. (137.5 square kilometres per site, on average.) Given Australia has a surface area of 7.692 million square kilometres, with over 70% outside of coverage area, many inhabitants will remain reliant on fixed line telephone services, including geographically isolated students who require telephone service access daily in order to participate in distance education lessons.

Problems such as the lack of mains power for mobile tower sites (solar is impractical with existing technologies) and the lack of back-haul opportunities (by which calls are transferred to the main-stream network) make much of isolated Australia even more difficult to connect to the mobile network.” (10) USO ICPA Qld Inc. USO Position Summary.pdf

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Should a universal service fund be established, particularly, to address new or future changes in technology and in consumer needs and preferences?

“Yes, there should be funding made available to ensure the operation and upgrade of the Legacy Network and to ensure it has sufficient capacity and reliability to meet the demand for services. This funding can be from the USO Levy, direct Government funding or a Universal Service Fund. Whatever funding source (or sources) is used, it is necessary that USO services are adequately funded.” (Branch Member No 1)

INFORMATION REQUEST — IMPLEMENTATION AND TRANSITION

How will agreements relating to the current USO affect the implementation of, and transition to, any new universal services policy?

ANY agreements relating to the current USO which may affect the implementation of, and transition to, any new universal services policy should remain in place until any new universal

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services policy is fully implemented and functional. There should be no “transitional gap period” where the restoration of faults and installation of new services “hangs in limbo” due to poor implementation/transition arrangements.

What impact will the timing of the NBN rollout have?

“The timing of the NBN rollout should have no impact of the introduction of a new USO policy.

Allowance should be made for the transition from copper to optical fibre in the areas that Voice services are being transitioned to nbn fibre.” (Branch Member No 1)

Is there a need to review current governance arrangements?

“Yes, it is essential that any contracts to maintain Legacy services address the need for plant upgrades to ensure services are reliable and are serviced in a timely manner.” (Branch Member No 1)

What should be the role of state and territory governments?

State and territory governments MUST realise that less than 30% of Australia’s land mass lies within the mobile telephone footprint.

Governments must also realise that;

“Inhabitants of the over 70% of Australia who reside outside of mobile phone coverage are absolutely reliant on the telephone for education, health, social and business use, as they often have no other easy access to these services.” (Branch Member No 5)

“State and Territory governments must ensure there are no barriers to the provision of reliable Telecommunications infrastructure and where ever possible contribute funds or in kind support to ensure the Mobile and fixed line networks are upgraded and maintained correctly.” (Branch Member No 2)

What other matters should be considered in relation to implementing and transitioning to any new universal services policy?

Members of the Yaraka Isisford Branch of ICPA, together with all residents of Australia who do not have access to an in house handheld mobile telephone service or have special needs require a telephone service that works, works all the time, and if it fails, is repaired promptly.

In concluding I would like to quote from an address by Mr E.C. (Bunny) Powne M.B.E. Life Member ICPA Queensland Council Inc., Life Member ICPA Federal Council Inc. and Life Member ICPA Bollon Branch.

In his address to ICPA Queensland Inc.’s 40th State Conference in 2011 Mr Powne said, “In 1978 ICPA was asked at a National Conference in Canberra what were ICPA’s priorities and the answer given was: “ICPA has three priorities - **First:** A Telephone. **Second:** A telephone that works, and **Third:** A telephone that works all the time.”

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Now, some thirty-eight years later, the priorities of Yaraka/Isisford Branch of ICPA on whose behalf I have written this submission are to ensure that the provision of the **terrestrial based** telecommunications service on which we rely for SAFETY OF LIFE, education, business and personal requirements continues to be under-pinned by a USO and a CSG.

Disclaimer: “Comments made by Branch members are based on individual experiences and therefore may not necessarily reflect ICPA Australia Inc. policy. Issues raised by members are based on the experiences and views of individual end users.”