

Isolated Children's Parents Association Qld Inc.

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Lobbying for opportunity, equity & support for all rural and remote students

To:

Telecommunications Universal Service Obligation Inquiry

Productivity Commission

GPO Box 1428

CANBERRA CITY ACT 2601

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

SUBMISSION

to the Telecommunications Universal Service Obligation Draft Inquiry Report

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

The Isolated Children's Parents' Association Qld Inc. is concerned with the educational opportunities of children in regional and remote areas. ICPA Qld Inc. represents forty-six branches, comprising over 1200 families scattered throughout regional and remote areas of our State.

ICPA Qld Inc. is the only community based parent group with interests in all sectors and levels of education – state schools, independent, church or boarding schools, preparatory to tertiary education and all methods used to facilitate access to that education.

Many of our member families are dependent on Schools of Distance Education for at least their primary schooling. For the effective delivery of curriculum that has elements comprising voice, data and video transmissions both the school and the home classrooms must have communications systems of sufficient capacity. At present many families struggle with systems that do not reliably meet these requirements.

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. The need for a standard telephone service is particularly vital for students who have no reasonable daily access to a school due to geographic isolation and who therefore study via distance education.

Furthermore, a quality telecommunications service is a fundamental requirement, necessary to attract and retain young

families and professionals to rural and remote communities.

ICPA (Qld) Inc. supports the need to change and strengthen the Telecommunications Universal Service Obligation to reflect current and future technology innovation, however the suggestion to remove the telephone service USO entirely is of grave concern. The right to a standard telephone service is essential, as over seventy percent of Australia has no mobile coverage. Standard telephones have proven more reliable in extreme weather events, when safety of life requires the ability to communicate.

The USO should be strengthened regarding fault restoration times. Extended service outages appear to be much more prevalent, due to aging infrastructure, reduced preventative maintenance, and a reduction in the number of skilled technicians in rural and remote areas.

Service Providers and the general population has become dependent on reliable access to data. At present nbn Skymuster services have not provided reliability for many consumers. Service interruptions are reasonably common. Nbn acknowledge issues such as being adversely affected by some weather conditions, advising the 2014 ICPA (QLD) Inc. conference that they expected service failure or severe degradation of more than ten days a year above the Tropic of Capricorn. While there is a need for the USO to encompass access to data, minimum reliability and performance standards should be stipulated.

While data usage in Australia is increasing at an average of 22% per year, this is a limited capacity service. The 2011–12 Regional Telecommunications Review highlighted the capacity limitations to nbn satellite services, stating the Skymuster satellites will become congested before all projected customers are connected. Certainly, my experience indicates participation in on-line livestock sales is not possible via this medium, due to the number of households connected at once. Given the percentage of connections still to occur, the nbn satellite system's ability to meet the needs of the future. ICPA (QLD) Inc. believe the enquiry's assertion that "market failures" and "market gaps" do not in themselves provide a case for government intervention to be, at best, reckless. Safety of life is reliant on reliable telecommunications. Government responsibility should not be ignored due to issues such as the cost to the community of achieving a minimum universal service.

Similarly, technology neutrality should be underpinned by a requirement of a suitable minimum standard, with regard to usability and reliability.

The inquiry states the nbn network has the ability to provide a USO service. Nbn's target times for fault restoration currently do not allow for this in non-satellite areas, being 4 days for regional areas, 10 days for remote areas and 90 days for isolated areas. Satellite based services have not demonstrated the reliability to be considered as such a service, without basic limitations caused by limited capacity or quality of a voice call via this medium.

The inquiry's draft documentation lists a satellite reliability target of 99.7%. Target figures are poor consolation when the regular performance is slow or unreliable. The history of satellite usage in Australia has largely promised far more than it has delivered, and nbn's Skymuster satellite is no exception. Service outages and poor quality service is common.

Rural mobile service failures can often extend for several days, and an assumption that this is a safe and reliable communication service is incorrect. A customer service guarantee would need to be incorporated into any new legislation dependent on mobile services.

In regard to draft finding 3.3, the inquiry considers the TUSO a blunt instrument with a "one size fits all" approach. A basic tenement of the TUSO is the right of all Australians to a standard telephone service. This "one size fits all" for equitable right to a service should be commended. The assertion of the enquiry that the Australian Government should phase out the existing telecommunications universal service obligation as soon as practicable ignores this right to an equitable service, and could endanger the lives of those without alternative forms of reliable communications.

Communications systems must be reliable without mains power, as considerable areas of Australia do not have this. In many regions that do have access to mains power, extreme events such as bushfire, cyclones and floods typically result in extended power outages.

INFORMATION REQUEST 6.1

Participants are invited to provide evidence on the adequacy of NBN's satellite voice services in relation to defining an acceptable baseline for a universal service. Information on practical and cost effective alternatives to NBN's satellite voice services in areas that currently have no mobile coverage, and their relative merits and costs is also sought.

Nbn's satellite voice services are reliant on a medium that has yet to have an acceptable record for reliability. Information and Technologies Branch, Department of Education, Training and Employment, Queensland, senior staff have advised ICPA (Qld) Inc. latency issues have resulted in a recommendation to Schools of Distance Education that satellite VOIP not be considered suitable for students for lower primary years (Kindergarten to year 3).

While I personally do use VOIP, due to the standard of service I only use this as an emergency if the fixed phone service is unusable. As we average in excess of 120 hours per annum of power outages, a satellite-based service would not be satisfactory as a sole phone service.

Nbn has yet to demonstrate the ability for fault rectification that would enable consideration as a USO provider. Target times of 90 days for remote areas highlight the issues. Reliability must be underpinned by speedy fault repair.

INFORMATION REQUEST 9.1

Participants are invited to comment on the relative merits of the following (or other feasible) transition options for the standard telephone service USO module of the Telstra USO Performance (TUSOP) Agreement.

Option 1: Amend the Telecommunications (Consumer Protection and Service Standards) Act 1999 (Cth) to change the scope of the current standard telephone service USO, thereby forcing the parties to negotiate a payment adjustment under the Agreement.

Option 2: Remove the standard telephone service USO in all areas once the NBN rollout is complete.

Option 3: Commence a staged wind-back of the standard telephone service USO in NBN-connected areas as soon as practicable.

ICPA (QLD) Inc. believes there is no current viable option other than the standard telephone service USO module of the Telstra USO Performance (TUSOP) Agreement for premises in Satellite areas. For all other premises, nbn's fault rectification times should be mandated at no more than stipulated in the current Telstra CSG. No telephony should be dependent on mains power.

In summary, the inquiry is placing extreme faith in satellite technology that is of questionable suitability and unproven reliability. nbn clearly state in their Skymuster user guide FAQ section, in response to "Can I use nbn satellite service for VOIP services?"

"Your internet service provider may offer and may need additional equipment. This service does NOT replace your normal telephone landline and should not be relied upon for emergency calls."

*For more information please contact
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