**Submission to the**

**Telecommunications Universal Service Obligation Enquiry**

The dependence on reliable telecommunication services increases with geographic isolation. The majority of Australia’s landmass has no mobile coverage.

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. At present, the Telecommunications Universal Service Obligation (USO) and Customer Service Guarantee (CSG) cover this.

The Telecommunications USO ensures all Australians have access to a standard telephone, and mandates repair times. The USO legislation also guarantees the consumer the right to access a small amount of data (64Kb/s).

Residents in 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 life style.

Health: Lack of a reliable telephone service is a real concern for all residents and families living in rural and isolated areas when sickness, ill health and accidents occur.
The stress of being isolated in an emergency and the lack of access to the Royal Flying Doctor Service is a major concern.

Education: 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.

Business: For our rural communities to operate successfully a quality telecommunications service is a fundamental requirement. To attract young families and professionals to rural and remote communities and for the successful recruitment and retention of employees, whether they are teachers, nurses, health care workers, stockmen and women etc., it is essential to have reliable telecommunication services.

Life style: The provision of a telecommunication service tailored to the needs of the impaired or disabled should remain.

The guarantee of a telephone connection for a new subscriber is important, and should also remain.

**There is a strong lobby from many areas that the USO is unwarranted, and money could be better invested elsewhere, we do not agree with this.**

The USO is absolutely essential, given the reliance on fixed phones across much of Australia. We welcome the opportunity to argue for a much-improved minimum standard, however it is imperative such a standard is legislated.

Technology has not yet provided an alternative to a USO mandated fixed telephone service for rural, remote and isolated subscribers. The retail market for relevant services will not deliver appropriate outcomes for consumers unless retail service providers are required by legislation to do so.

Repair timeframes: Connection and repair timeframes are contained in Telstra's standard marketing plan and the Telecommunications Customer Service Guarantee Standard 2011. This standard provides financial compensation to customers if maximum timeframes are not met.
Subscribers can wait for as long as several weeks before faults are rectified, and this appears to be occurring with increasing frequency.
Current CSG payments for service interruptions are inadequate.
Payments should increase exponentially with fault duration or recurrences of the same fault.

Data: Since 1999 the USO has recognised data accessibility as an essential service within the USO legislation, but this has not been enforced. All Australians are apparently entitled to a 64Kb/s minimum service; however, this minimum speed is completely out-dated for today’s era of digital technology.
Education Queensland advise that Distance Education participation requires a download speed of at least two Mb/s. With today’s digital curriculum, a minimum speed should be one that adequately meets the needs of education delivery.

This enquiry provides an opportunity for great improvements to our telecommunication services. We thank the Commission for this opportunity to provide input.

Mobile coverage: Suggestions that the USO is no longer necessary because of mobile phone availability, advanced technology and the nbn ignore the reality of the massive technological hole experienced by people in rural and isolated areas.
Mobile coverage is important and all reasonable efforts should be made to extend the footprint, but with current technologies, diverting USO funding to expand mobile service would not achieve total coverage for many years to come.

Recommendations:

* The retention of the USO is essential for the protection of us, the customer.
* A fixed telephone service and a reliability guarantee are essential for rural, remote and isolated subscribers.
* Legislation needs to require retail service providers to improve and implement the minimum standards for fixed telephone service connection, operation and repair.
* Minimum data speeds should be reassessed, increased and enforced.
* Mobile coverage footprint should be extended where possible.

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