

**Isolated Children's Parents' Association of Australia Inc.**

**"Access to Education"**



**Submission**

**to the**

**Productivity Commission's 5-year Productivity Inquiry:**

**Australia's Data and Digital Dividend Interim Report**

**from the**

**Federal Council  
of the**

**Isolated Children's Parents' Association of Australia Inc.  
ICPA (Aust)**

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The Isolated Children’s Parents’ Association of Australia, ICPA (Aust), welcomes the opportunity to contribute to the *Australian Competition and Consumer Commission Regional Mobile Infrastructure Inquiry* providing feedback related specifically to the communications needs of rural and remote education and geographically isolated students.

ICPA (Aust) is a voluntary, apolitical, national parent organisation, which advocates on behalf of our members for equity of access to an appropriate education for all geographically isolated children and students, from early childhood through to tertiary. The majority of member families of the Association reside in geographically isolated areas of Australia, and all share a common goal of achieving equitable access to education for their children and the provision of services required to achieve this. Students whose family home is in rural and remote Australia, often live great distances from their nearest education institution and from services required to support the education of these students.

ICPA (Aust) advocacy extends to communications needs of rural and remote education and geographically isolated students. Often in rural and remote areas of Australia adequate communications underpin the ability for students to access their education programs and resources. The importance of ensuring high quality, reliable and affordable communications services is critical. For these students, communication is key.

### **Section 3.1 of the Report - Investing in regional digital infrastructure**

ICPA (Aust) emphasises that accessibility and availability of high quality, reliable and affordable communications services is critical in regional, rural and remote Australia and we specifically wish to add comment on **Section 3.1 of the Report - Investing in regional digital infrastructure**.

ICPA (Aust) welcomes the statement made as part of the recommendations from this section of the report “to improve access to low-cost, reliable, future-proofed internet services in regional and remote parts of Australia”. Further, the acknowledgement that investment in digital infrastructure in regional and remote Australia is required to deliver productivity-enhancing access to low-cost and reliable internet for local businesses and workers and to promote social inclusion and allows access to quality essential services and expertise that are increasingly available online is encouraging. While it is logical that this funding should be transparent and accountable, as an advocacy group seeking educational equity for rural and remote students who rely heavily on digital and data services to access and participate in education, we also reiterate that adequate digital infrastructure is imperative and should not be limited in any way to ensure these students can access online educational programs and resources.

ICPA (Aust) does harbour concerns regarding the suggestion of a market-based mechanism for digital infrastructure where the intent would result in the government paying the least-cost private provider to guarantee a minimum service level in each location, with the cost to government determined by the market. Regional and remote consumers require high-quality, adequate and reliable communications services and the least expensive solution may not be the best fit. Regardless of cost, assurance is needed that provision of communications and digital infrastructure in rural and remote areas is based on need and best fit, reliability and capability, not simply the cheapest alternative.

Concerns regarding the suggestions of utilising least cost providers also extends to data and internet services in remote locations. ICPA (Aust) members have previously put forward motions at our Federal Conference seeking assurance that the government subsidy which allows nbn Sky Muster satellite services to be installed at no cost to those living in geographic isolation will continue unchanged. It is a concern that moving towards market based mechanisms could have a detrimental impact on installation and hardware costs for these families.

This is even more concerning for transient working families in remote locations who currently have limited to no internet connectivity, with recently developed transportable technology only available at excessive cost, which is out of reach for many. If a focus on cost effective technology and services is implemented, these expensive solutions, which are only required by a small number of consumers, may be viewed as unviable and development and availability may be curtailed, therefore leaving these families with no access to essential digital technology.

Further, should cost-effective, market mechanisms be implemented for the provision of digital technology in remote locations, consideration needs to be taken of the current limited to no mobile coverage across vast portions of the country. Establishing mobile coverage in rural and remote areas is often not seen to be cost effective by telecommunications companies, and endeavours to create competition to reduce pricing may fail due to lack of interest for small gains or possible loss. Mechanisms need to be in place that ensure services to those who may not otherwise receive mobile services will still be prioritised. While many ICPA (Aust) members have no access to mobile coverage, some have achieved connection to the network through the use of equipment (aerials and boosters) which improve and enhance signal and connectivity, at their own, often extensive, cost. This is a unique situation for these remote locations and this and other distinctive situations for these consumers need to be taken in to consideration when applying any new mechanisms. Safeguards are required to ensure rural and remote residents are not disadvantaged or incur extra costs by the implementation of blanket recommendations.

People living in rural and remote areas often go to great lengths and private expense to try to bridge the gap in order to access digital services, whether this is internet, telephony or television. These extra costs, covered by the consumers themselves should also be taken into consideration when new methodologies are discussed. Each time technology changes, families living in rural and remote areas have additional costs, which are often significant, in order to update equipment and resources to try to remain connected in the quickly changing digital world. An example is the imminent change from 3G to 4G mobile service, where some rural and remote customers who live on the fringes of mobile coverage have purchased and installed at their own expense aerials, antennae, boosters and compatible handsets to connect to mobile services and now need to upgrade this equipment. 5G is approaching in the future and these same families may again be required to upgrade to access a service that others living in metropolitan or larger regional centres can access without the need for extra purchases.

### **Universal Service Guarantee (USG)**

ICPA (Aust) understands that in geographically isolated parts of Australia it can prove challenging not only to provide adequate communications services, but to also ensure these services are maintained, repaired and are reliable. It is therefore crucial that the Universal Service Guarantee (USG) be maintained for both voice and data services. The USG guideline for repairs in remote service locations is three full working days after reporting. Feedback indicates that a number of our members have recently experienced being without a fixed landline phone service for up to six weeks from the first date reported. Repair dates had been provided only to be extended on numerous occasions. These members were either not offered an alternative service and/or due to poor mobile coverage (or no coverage at all) were unable to rely on a consistent service from the existing mobile tower, leaving members with a lack of communications. The number of repeated extended telephone outages occurring in aging exchanges is extremely concerning, especially when the supply of parts is the cause for the delay.

Further, it is essential that a commitment remains to maintaining current services until adequate alternatives are available for rural and remote consumers, regardless of cost. Although the Universal Service Guarantee (USG) continues to be in place, we are aware of cases where USG timeframes for

repairs and maintenance of current services have not been upheld. The USG must be maintained to ensure rural and remote customers are not left without adequate communications.

ICPA (Aust) implores the Commission to recommend that until adequate communications can be assured in rural and remote communities, that regardless of the advantages of implementing market-based mechanisms, that processes are implemented to safeguard these consumers to ensure they are not disadvantaged with the implementation of any recommendations related to digital technology and communications services.

#### **Other - Alternative Voice Services**

ICPA (Aust) understands that new technologies and alternative voice services are being investigated for residents who currently rely on High Capacity Radio Concentrator (HCRC) systems and many of whom do not have mobile coverage in their area. Regrettably, at this time some of these alternatives seem to be reliant on access to mobile service for those in a less isolated location. Other alternatives being proposed are Voice over Internet Protocol (VoIP) services which would rely on satellite technology. While they would likely not be associated with Sky Muster satellites, instead relying on Low Earth Orbiting Satellites (LEOS), we continue to harbour concern that VoIP services could be impacted by extensive power supply issues associated with many geographically isolated locations, as well as weather and environmental events such as heavy rainfall, extreme heat and excessive dust common to rural Australia.

While VoIP is an alternative to current services and is already being utilised in some instances, the call quality is an issue. Further, a shift to VoIP being the only voice service available for some of our members would be unsuitable as it would mean that these families would be reliant on only satellite technology for all of their communications needs. Should there be an issue arise which impacts on satellite services, such as those mentioned above, or an outage to the satellite itself, the result may be no access to any form of communications for these families. This circumstance would be debilitating for schooling, business and safety reasons and it is therefore essential that until new alternative services can be guaranteed to provide dependable, affordable and reliable telephony, families in rural and remote areas are catered for adequately and have at least two independent communication sources available to them.

#### **Other – Digital Literacy**

A key impediment to the communications experiences of rural and remote members is a lack of understanding of communications and technology in rural and remote areas, not only in the case of individual consumers, but across many levels of the community. ICPA (Aust) therefore respectfully suggest that the Productivity Commission consider the need for a concerted effort toward building digital literacy and imparting relevant and accurate support and information in rural and remote areas to ensure ample opportunity for all residents to understand their communications options.

For example, in some states, issues with internet connections have occurred at small rural schools because school staff had limited understanding of their connections and could not directly contact their providers to gain assistance as this had to be done by the state education department. The state education department however do not always have the expertise in the various technology systems available to a school in rural and remote locations, which are often very different to a metropolitan school. Further ICPA (Aust) highlights that the on the ground experiences, local knowledge and skills of local residents should not be discounted and are indeed harnessed to promote awareness and build digital literacy in these rural and remote locations.

**Other - Telehealth**

Telehealth offers innovative opportunities for the delivery of allied health and specialist services such as speech pathology, mental health consultations, occupational therapy intervention to aid fine motor skill development and even capacity building to support educators and parents dealing with children experiencing difficulties in rural and remote areas. Availability, accessibility and adoption of telehealth services in rural and remote areas hinges on the availability of adequate technology and connectivity to these children and their families.

**Conclusion**

ICPA (Aust) appreciates the recognition of the unique communications challenges expressed in Section 3.1 of the Report and the work that is being undertaken to address the digital gaps in large portions of Australia. Any proposal to reduce the digital divide for regional, rural and remote communities needs to include steps towards digital literacy, a consideration for the private expense that customers incur to implement resources and equipment themselves in order to remain connected and that reliable, affordable and adequate/good quality communications services are essential for the health, safety, education and livelihoods of those living in these areas.