

Better Internet for Rural, Regional & Remote Australia
and
Isolated Children's Parents' Association of Australia Inc.



Submission into the Regional Connectivity Program

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1. Background

The Better Internet for Regional, Rural and Remote Australia (BIRRR) along with the Isolated Children's Parents' Association of Australia, ICPA (Aust), welcome the opportunity to provide comment into the proposed criteria for the Regional Connectivity Program (RCP). BIRRR & ICPA (Aust) understand the aim of the RCP is to improve digital connectivity in regional Australia. We would like to take this opportunity to thank the Federal government and the department for their work in this space and for the development of a program that offers bespoke solutions to regional areas needing improved telecommunications. It is essential that programs such as this are continually funded and implemented, to ensure regional Australian's can access communication services that meet their needs.

BIRRR was founded in 2014 due to a lack of information, advocacy and support for bush broadband consumers, in particular, those requiring equitable telecommunications for their businesses and education of their children. There are now over 11,000 active, engaged BIRRR members from every state and territory of Australia. BIRRR are a volunteer-based advocacy group, who offer support, independent advice and negotiate often-confusing bush broadband connections and issues. We also advocate for improved access to communications for rural, remote and regional (RRR) Australians. Along with troubleshooting issues, the BIRRR team has also undertaken extensive large-scale research on regional telecommunication needs and problems.

Rural, Regional & Remote (RRR) consumers are extremely reliant on effective communications, due to the nature of their geographical location, and this also heightens the need for effective representation. BIRRR welcomes government support and funding for improvements to regional connections.

ICPA (Aust) is a voluntary parent body dedicated to ensuring all geographically isolated students have equity of access to a continuing and appropriate education. This encompasses the education of children from early childhood through to tertiary. The member families of the association reside and work in rural and remote Australia and all share a common goal of achieving access to education for their children and the provision of services required to achieve this. Many of our families live on isolated stations, great distances from their nearest community with their only access to education, including early childhood education, being via distance education programs.

As a stakeholder group focused on gaining equity for families accessing education while living and working in rural and remote Australia, ICPA (Aust) supports any initiatives which may improve educational access and outcomes for rural and remote students.

2. Responses to Questions

Question 1: Are there additional key elements that should be incorporated into the design of the Regional Connectivity Program?

BIRRR & ICPA (Aust) agree with the five key principles and also emphasise that RCP criteria for funded applicants should include service performance and consumer guarantee parameters.

- Guaranteed service speeds as per the Statutory Infrastructure Provider (SIP) Scheme, under the Telecommunications Legislation Amendment (Competition and Consumer) Bill 2017 (Parliament of Australia, 2018), where retail services will need to supply peak download speeds of at least 25 Mbps and a peak upload speed of at least 5 Mbps.
- Funded applicants should ensure affordability is considered by adhering to pricing and data packages that are affordable to RRR users, with data allowances not being less than nbn Sky Muster top peak data plans and pricing being less cost than nbn Sky Muster plans.
- Funded applicants should ensure installation costs for end users is kept to a minimum.

The above criteria would ensure that value for money was being achieved from the grants process. The RCP should address areas that have been underserved by nbn, allowing these consumers to access a connection that is better than their existing communications service, and this should not come at an excessive cost to the end user.

Question 2: Should other parties, for example local government authorities, business organisations or industry groups, be allowed to lead a bid for Regional Connectivity Program funding?

BIRRR and ICPA (Aust) encourage the Department to work collaboratively with regional communities to ensure the RCP meets the communication needs of each location. The RCP should address areas that have been underserved by nbn and for this to occur community engagement is essential.

Local government is well placed to be able to determine the needs, limitations and shortfalls of communication services within their jurisdiction. We believe local government should be able to use the Regional Connectivity Competitive Grants Program for bespoke solutions to improve connectivity options in the regions. An example of this is the Barcaldine Regional Council, Queensland, who recently installed a Telstra 4G Mobile Satellite Small Cell in a tourism hot spot with no connectivity (Barcaldine Regional Council, 2019). Local regional councils could also partner with independent WISP's, by offering co-contribution funding to improve the communications services in their shires. This would boost the RCP and allow further coverage. However, not all local government areas are supportive of improved communications infrastructure and as such local government alone should not be an

exclusive stakeholder. Isaac Regional Council (IRC) recently stated development application fees of \$24,000 would apply to Telstra for the construction of a small cell on private property at Mistake Creek State School (Charles, 2019), Central Queensland. Whilst other regional councils are leading bids for improved connectivity funding, IRC seems to be constricting service improvements.

TELSTRA 4G MOBILE SATELLITE SMALL CELL

A Telstra 4G Mobile Satellite Small Cell tower was commissioned and installed at Lake Dunn last week. This will enable mobile phone, messaging and emailing use in the area surrounding the toilet and shower block. The station has a guaranteed reception radius of 500m but may be picked up from three (3) kilometres away. This is a great asset to the Lake Dunn area for locals and tourists and their safety and connectivity.



The Telstra 4G Mobile Satellite Small Cell tower being used by tourists at Lake Dunn.

Lake Dunn Co-Funded Small Cell (Barcaldine Regional Council, 2019)

Business, industry and community groups should also be considered as eligible parties for the grants process. Both businesses and community/industry groups can offer significant co-contributions and partner with telecommunication providers to ensure needs based communication services are a priority. For example, Round 1 of the Mobile Blackspot Program (MBSP) saw mobile black spots addressed using co-contributions from businesses such as Jemalong Irrigation Ltd in NSW and Calliope & Districts Enterprises Ltd in Queensland. Local community groups also co-contributed funds for place-based solutions, with Calliope Rodeo Association contributing \$80,000 for a base station at Ubobo. In Round 2 of the MBSP program an additional \$475,000 was provided by local government, business and community groups (BIRRR, 2015). There have also recently been examples of industry groups working together to secure telecommunication solutions for their specific area. The Stirlings to Coast Grower Group in Western Australia struck up a private partnership with a communications company to connect properties to the nbn fibre optic network through a base station in a town north of Albany. Funded in part by a \$277,500 grant from the Western Australian Government, the pilot project aims to connect 50 farms within a 100

kilometre radius, with a possibility to extend the connections if it's proven to work (Mochan & Bennett, 2019). The RCP should build on the success of pilot projects such as these.

We believe that encouraging business, industry and community groups and local government co-contributions will enable more localities to be able to access place-based telecommunications solutions and increase the number of projects able to be funded under the RCP.

Question 3: Are there other organisations beside local, state and territory governments that could be considered 'trusted sources of information' for the purposes of identifying local telecommunications priorities?

Organisations such as BIRRR, ICPA (Aust), Country Women's Association and other groups who formulate the Rural, Regional and Remote Communications Coalition (RRRCC) should be consulted in regards to prioritising the investment and how this can be best achieved. Additionally, specific areas may already have stakeholder groups and organisations in place that can assist in providing further information, such as Remote Area Planning and Development Board (RAPAD) in Central Western Queensland, Central Highlands Regional Resources Use Planning Cooperative Limited (CHRRUP) in Central Queensland, Western Australia 'Grower Groups' and other place-based support groups and organisations. Those 'on the ground' in regional areas are well placed to identify local telecommunication priorities.



RRRCC Member Organisations

Question 4

Are there ways that the Department can facilitate linkages between potential infrastructure providers and local communities?

A map of regional backhaul availability Australia wide would greatly assist infrastructure providers, enabling them to easily access available backhaul and thus determine if improved communications infrastructure can be provided to regional communities. The Department may be able to find instances where this has already occurred for example the WA Digital Infrastructure Atlas. The Atlas illustrates all key telecommunications infrastructure such as the telephone exchanges, dark fibres and radio-communication sites around Western Australia (Department of Primary Industries & Regional Development, 2019). Some regional councils have also undertaken digital and communication audits which could be used as a starting point for communities and understanding their needs and current limitations. As an example, the Central Highlands Regional Council Queensland Digital and Communication Audit (Gravelroad Consulting, 2017).

To enable smaller infrastructure providers in applying for funding, we encourage the Department to consider collective methods of reducing application costs and enabling local community engagement in the funding process. Collaborative processes between all stakeholders are more likely to achieve the aims of the RCP and will increase the likelihood of delivering more effective outcomes.

Question 5: Are there any comments that you wish to make in relation to co-contributions?

BIRRR and ICPA (Aust) concur that a 50% co-contribution should be applicable to funded applicants. This will ensure the business commitment of the provider.

The RCP should also have the ability to enable multiple co-contributions to make up the 50 per cent of project costs e.g. local government plus several community organisations may make up one project or several industry groups may co-contribute together to fund the project. State governments should also be encouraged to co-contribute to projects. The Department should ensure that funding is directed to areas that demonstrate the greatest need.

Question 6: What type of projects should be considered for funding through the Regional Connectivity Program?

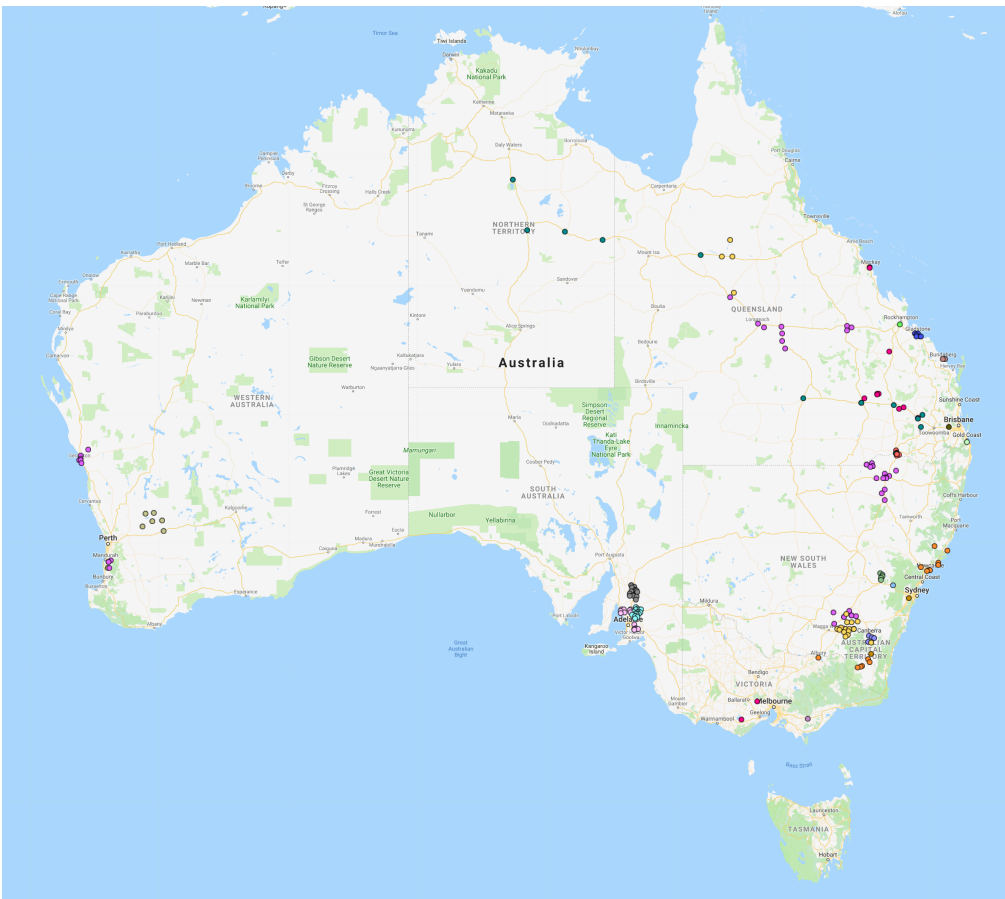
The emphasis of the RCP is on 'eligible areas' defined as those currently mapped to receive nbn Sky Muster technology. Across Australia there are a significant number of regional towns that are mapped for nbn Sky Muster that are currently using legacy ADSL technology. Many of these residents are unclear as to the future of these services, with no upgrade to the technology planned for the future that would ensure comparable or enhanced communication services. nbn has underserved these communities, as nbn Sky Muster delivers less data at increased prices and with a much higher latency when compared to legacy ADSL services. Additionally, voice services on nbn Sky Muster are only available via

VOiP, which can be unreliable and prone to issues. See BIRRR 2017 Submission to the Productivity Commission for issues with VOiP over nbn Sky Muster (BIRRR, 2017).

The RCP should place a priority emphasis on these areas under the program, with funding being used to deliver place-based solutions to underserved areas. The Department should work with communities and infrastructure providers to ensure funding will meet the needs of the community. These solutions could include, but are not limited to the following technologies:

- Mobile towers and small cells (although this would be better addressed through the MBSP program if subsequent rounds addressed some of the same criteria as the RCP e.g. place – based solutions for local councils, community/industry groups) for areas such as community meeting places, remote tourist hot spots.
- Independent Wireless Internet Service Providers (WISP's) in regional towns and areas currently mapped for nbn Sky Muster.
- Upgrading ADSL services to nbn fixed line or fibre in nbn Sky Muster mapped areas.
- nbn Fixed Wireless in areas with larger numbers of residences mapped for nbn Sky Muster e.g. on the outskirts of large regional towns.

There is a need for a map of independent WISP's for regional areas, to highlight areas already served and gaps in services. We encourage the Department to work with established WISP's to ensure the criteria of the RCP enables them to access funding. BIRRR has an nbn alternative fixed wireless/ independent WISP provider map, however this is not comprehensive and relies on the WISP's to keep their services updated with BIRRR, additionally not all WISP's are aware of BIRRR. The map is constantly updated and a live version can be viewed here: <http://www.zeemaps.com/pub?group=2307253>



BIRRR WISP's Map (BIRRR, 2019)

Question 7

Are there any comments that you wish to make in relation the proposal that all Funded Solutions will provide Retail Services for a minimum of 10 years after the Asset has become operational?

This criteria is welcomed, especially considering the recent closure of independent WISP companies due to liquidation. BIRRR has had a number of members that were adversely affected due to carriers going out of business.

Red WiFi, based in the Darling Downs region of Queensland ceased operation in September 2017 (Arboleda, Regional telco Red Wifi blames NBN costs, low margins for insolvency, 2018) and South Western Wireless Communications (providing services to regional communities in NSW and QLD) went into administration in March 2018 (Arboleda, Funding woes led to downfall of South Western Wireless Communications, 2018). Additionally Aussie Broadband made a management decision to cease operating their independent fixed wireless towers in Victoria and South Australia, leaving many regional users who used these towers with no alternative than nbn Sky Muster satellite. Funded solutions should be able to clearly demonstrate they have the financial means and management skills to install and provide services for a minimum of 10 years after the asset has become operational, as well as the additional criteria suggested in Question 1 of this submission.

Question 8

Are there any comments in relation to the proposed Eligible and Ineligible Areas?

BIRRR and ICPA (Aust) believe priority should be given to the following areas, after a thorough investigation has occurred that ensures the service meets the need of the community, with no existing plan in place for future communications infrastructure improvements:

1. Small communities mapped for nbn Sky Muster and currently also able to access ADSL (ie they have been underserved by nbn and will place an unnecessary load on Sky Muster if their ADSL deteriorates further/is ceased)
2. Small communities mapped for nbn Sky Muster and currently accessing ADSL2 (ie they have been underserved by nbn and will place an unnecessary load on Sky Muster if their ADSL deteriorates further/is ceased)
3. Regional towns with nbn fixed line to the town centre and with a large number of residences on the outskirts mapped for nbn Sky Muster, who would be better served by nbn or alternate fixed wireless services.
4. Community meeting places that have no connectivity options such as campgrounds, tourism hotspots, meeting places of community groups in remote locations.

Question 9

Are there any comments that you wish to make in relation to the proposed eligible and ineligible expenditure?

We agree with the proposed eligible and ineligible expenditure criteria.

Question 10

Are there particular circumstances where it may be appropriate for the Commonwealth to make some contribution to ongoing operating expenses?

N/A

Question 11

Is there a case for a third category, for highly localised solutions for projects that, for example, are seeking funding of less than \$200,000 (GST inclusive)?

This category would be a welcome addition to the program. Funding of less than \$200,000 could be used for mobile small cell installations or for boosting the signal of an existing technology. This category should have reduced criteria to access funding, to ensure funding is directed to the project rather than the application process.

Question 12

Are there any other design principles that should be considered?

N/A

Question 13

Do you have any comments on the proposed assessment criteria?

N/A

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