

Mr Sean Edwards  
Chair  
Regional Telecommunications Independent Review Committee  
Department of Communications and the Arts  
GPO Box 2154  
CANBERRA ACT 2601  
Via email to: [secretariat@rtirc.gov.au](mailto:secretariat@rtirc.gov.au)

3 August 2018

Dear Mr Edwards

The Australian Local Government Association (ALGA) appreciates the opportunity to make a submission to the 2018 Regional Telecommunications Review.

ALGA is the voice of local government in Australia, representing around 537 councils across the nation. ALGA's President represents local government as a member of the Council of Australian Governments and several other ministerial councils. In structure, ALGA is a federation of state and territory local government associations.

This submission should be read in conjunction with any separate submissions received from state and territory associations as well as individual councils.

ALGA's position over many years is that equitably delivered and affordably priced telecommunications facilities should be available to all Australians, no matter where they live. Provision of information technology to all Australians is vital to innovation, economic growth and social equity, however, it is even more important to regional Australia where the tyranny of distance increases the inequity of services available.

Should you require any further information in relation to matters raised in this submission, please contact me on (02) 6122 9414 or email [roslyn.chivers@alga.asn.au](mailto:roslyn.chivers@alga.asn.au).

Yours sincerely,



Roslyn Chivers  
Executive Director Policy

# ALGA SUBMISSION TO THE REGIONAL TELECOMMUNICATIONS REVIEW 2018

The Australian Local Government Association (ALGA) welcomes the opportunity to make comments to the Regional Telecommunications Independent Review 2018, announced on 30 April 2018. ALGA is the voice of local government in Australia, representing around 537 councils across the nation. ALGA's President represents local government as a member of the Council of Australian Governments and several other ministerial councils. In structure, ALGA is a federation of state and territory local government associations. This submission should be read in conjunction with any separate submissions received from state and territory associations as well as individual councils.

## General comments

In regional areas, the lack of access to reliable connectivity and the fact that transmission speeds and costs are higher than for the same service in the cities, continues to limit the ability of some councils and their communities to access the benefits of new technologies and the digital economy. ALGA's position over many years is that equitably delivered and affordably priced telecommunications facilities should be available to all Australians, no matter where they live – however, the challenges of Australia's geography and population distribution are acknowledged. Provision of information technology to all Australians is vital to innovation, economic growth and social equity, however, it is even more important to regional Australia where the tyranny of distance increases the inequity of services available – including education, health, economic and social.

Over the years ALGA's National General Assembly of Local Government, held annually, consistently receives motions from regional and rural councils calling on the government to improve telecommunications services in regional Australia. They express ongoing discontent with telecommunications blackspots and erratic internet services in rural Australia which are acting as an inhibitor to economic development, growth in existing business, the provision of modern education programs and creates difficulties for emergency service management during emergency events. Many submissions over the years have emphasised the need for connectivity in rural and remote areas, the additional benefits it will bring to agriculture, emergency management arrangements, tourism and rural and remote schooling. Motions over several years are included as Appendix 1.

ALGA reiterates comments it has made in previous submissions to the RTIRC and the 2020 Summit about the importance of fibre backbone, namely that the National Broadband Network should ensure that all government offices (including local government and public libraries) have fibre links to be able to serve the community to the best possible standard.

Although some mobile blackspots are being funded and are connecting those communities, ALGA supports a core backbone of fibre to ensure appropriate telecommunications infrastructure can support all Australians and rural and regional communities do not remain disadvantaged. Broadband coverage should ideally be extended to all councils across Australia. Initiatives such as electronic Development Applications, and the range of smart technology solutions and opportunities (smart lighting, smart bins, air quality monitoring, IoT etc) that broadband offers are not supported by the bandwidth offered in many rural and remote councils.

Telecommunications infrastructure provision must also be reinforced by other relevant support, such as the development of business applications and training programs to upskill the workforce. Investing in the capacity of ICT staff will help overcome ICT skills shortages which are impacting local authorities.

## **Barriers to regional communities increasing their use of digital technologies and possible solutions**

Despite significant investment in the roll out of the National Broadband Network and the Mobile Black Spots Program, there are still regional and rural communities which either do not have a reliable telecommunications service, and/or pay well above their urban counterparts for much lower data speeds and amounts. Some regional councils have advised that they do not have the capacity to send out electronic rates notices due to the unreliability of their broadband service.

Communities on the NBN Sky Muster Satellite service receive unreliable service, as it is affected by weather and latency issues. A recent example of the problem has been highlighted by the NSW town of Wamboin, which is just 20 km from Canberra. The towns of Wamboin, Bywong and Sutton have 4,000 residents who currently rely on the Sky Muster Satellite service. In addition to the satellite being too slow and unreliable, it is much more expensive than other NBN services – costing around \$200 per month for 120MB of data. On fibre they could receive unlimited data for \$80 per month. The community says the discrepancy in services is increasing the digital divide, rather than reducing it, and they are banding together to finance and build a private fibre network. Modelling shows \$4M cost to install fibre would be recouped within 5 years. However, it should not be up to communities to finance connection services which in other areas are financed by government through the NBN.

The changes over the years to the rollout of the NBN and the change from the Fibre to the Premises (FTTP) model to the Multi Technology Mix (MTM) model, has also contributed to the digital divide.

A survey of Queensland councils by the Local Government Association of Queensland in 2017 found that poor network infrastructure continues to have a major impact on connectivity and productivity across a significant proportion of Queensland. Only 55% of Queensland councils reported their community having access to high quality internet in their local areas. This has only risen by 8% since 2013 when Queensland first surveyed its councils to assess their digital and technological capability.

Councils understand the benefits of digital productivity and technology and understand that investing in technologies will improve their performance and improve productivity. However, regional councils are unable to maximise their digital productivity through inequities of speeds, costs and reliability. The uneven playing field is increased for regional communities because of this. In order to transition to smart communities, regional councils require reliable affordable services and support.

ALGA's 2018 – 19 Federal Budget Submission to the Treasurer identifies the need for a program to improve the capacity of regional councils through a Digital Local Government and Rural/Regional Telecommunications Program of \$100M over 4 years to increase the community benefits of improved technology, connectedness and innovation. ALGA also calls for the Commonwealth Smart Cities and Suburbs Program to be supplemented by a Smart Communities Program of \$100M per annum over four years to support councils in their digital transformation journeys. ALGA's analysis indicates that these two programs would have a cumulative GDP benefit of \$340.4 million over 3 years and create up to 1000 new jobs.

### **Extension of the Mobile Black Spots Program**

The Government has committed \$220 million to the Mobile Black Spot Program to invest in telecommunications infrastructure to improve mobile coverage along major regional transport routes, in small communities and in a number of identified priority locations. The Commonwealth program required a co-contribution (co-funding from local government, state or territory governments, commercial entities, MNOs, infrastructure providers). Round 3 of the Mobile Black Spot Program allocates \$60 million to Priority Locations, to target locations announced by the

Government. There are 125 identified Priority Locations. Round 4 was announced in June 2018 and committed a further \$25M to improve coverage in Regional Australia.

Despite being extremely keen to secure mobile coverage and take part in the Mobile Blackspots Program, locations which most need coverage under the Program are in rural and remote areas and rural and remote councils are generally the least capable financially of providing co-contributions for projects. In the Northern Territory for example, in addition to the financial constraints experienced by NT rural councils, many councils do not have tenure over land and are not in a position to offer land as a co-contribution. This is further complicated by the fact that remote locations are the most non-viable commercial locations. These communities are currently without mobile service because of the prohibitive cost of deploying the service and financial constraints.

ALGA fully supports the Mobile Black Spots Program to improve access to mobile services in regional and remote areas. The principle of councils assisting to bring mobile phone infrastructure into their region, either through cash or in-kind, has had success in the past. However, we are now looking at the most uneconomical locations which will be incapable of receiving reliable, robust telecommunications infrastructure without Commonwealth assistance. While satellite will be the only solution in some locations, providing communities with the core infrastructure to be able to participate in the digital economy will open regional economic opportunities unavailable through a satellite service.

ALGA calls for the continuation of the Mobile Black Spots Program, to assist regional rural and remote communities connect to and fully participate in the digital economy. Some councils cannot even transition to electronic rates notices due to the unreliability of the broadband available. This is in addition to the cost differences and data limits between metro and rural/remote communities.

The submission by the Local Government Association of the Northern Territory suggests the Government find ways to cross-subsidise the costs of regional/remote communities by those who live in the cities who receive broadband at far lower costs.

ALGA supports early consultation with communities and councils to determine precise locations of wireless base stations given the significant lead times and the ability of NBN Co to sell backhaul capacity to mobile network operators. ALGA would suggest that the priority should remain on providing services to areas of most need, and this not be diluted by seeking commercial advantage for carriers.

### **Broadband underpins community resilience to disasters**

Mobile phone blackspots adversely affect community resilience and increases the vulnerability of communities when the need for mobile communications is heightened. The 2011-12 Regional Telecommunications Review found that the adequacy of mobile voice and broadband services was the predominant concern raised with the Committee, and the issue was raised in every regional consultation.

All Australian governments have adopted a resilience-based approach to emergency management and are actively engaged in implementing the National Strategy for Disaster Resilience. The Strategy recognises that Australia is a vast and diverse continent and that a "national, coordinated and cooperative effort is required to enhance Australia's capacity to withstand and recover from emergencies and disasters". It also recognises that "disaster resilience is a collective responsibility of all sectors of society".

It is accepted that the Australian population is increasingly reliant on mobile services as a convenient utility for safety and emergency purposes. However, mobile phone "blackspots" exist in regional and remote areas of Australia meaning mobile telephone services cannot be relied upon or do not exist in some areas. Given Australia's vast land mass and sparsely settled populations in some remote areas, blanket coverage of the land mass is unlikely to be

achievable in the foreseeable future. While recognising that there will never be 100% coverage, improving mobile coverage will increase the safety of all Australians.

The use of Emergency Alert has enabled emergency service organisations (ESOs) to communicate with the public quickly through text messaging. However, “black spots” impact on the effectiveness of Emergency Alert.

Nevertheless, it is also acknowledged that Emergency Alert is only one mode of communication that ESOs use to disseminate warning messages. The roll out of the NBN Co infrastructure offers some opportunities for mobile carriers to increase their mobile footprint. However, it will be some time before the extent of these opportunities are fully known and realised, and some communities will need to rely on other forms of communication, such as satellite phones, in preparation for and during emergencies.

ALGA encourages all Governments to explore avenues to identify priority communities with high vulnerability to natural disasters, and seek to collaborate with NBN Co and carriers to improve coverage to those communities, particularly in regional and remote communities.

### **Payphones in rural and regional areas**

Local communities in regional, rural and remote areas continue to have concerns about the removal of payphones.

ALGA’s position on public payphones has been, and continues to be, that there must be consultation with the local community before removing payphones. Due consultation processes and transparency in decision-making are important to these communities. Payphones remain an essential and valued service in regional and remote areas. There has been a long history of concern over removing payphones, with motions passed at the National General Assembly over the years. Specific groups of people have a social need for payphones – to make emergency calls; people living in rural and remote Australia with unreliable mobile phone coverage; people on low incomes; and indigenous communities where people do not own mobile phones or share mobile phones.

While NBN is being rolled out to regional communities, remote communities continue to be disadvantaged under the NBN.

Many remote communities will only ever get satellite service, and it is these communities, because of their remote location which need reliable communication infrastructure - particularly for distance education and health. Residents outside the footprint of fixed-line connections to the NBN are worried about the reliability of the Sky Muster satellite and cost of data. For many people in the bush, landlines remain crucial, particularly in times of emergency. The Universal Service Guarantee is considered vital for rural, regional and remote Australia.

### **Cybersafety**

The internet is bringing with it challenges relating to online safety and online security. While some councils have taken precautionary actions or had to take actions after a cybersecurity breach, councils in regional areas have far less resources to develop and implement solutions. Commonwealth assistance in the development of solutions and raising awareness of managing data and data security is needed to improve the cyber security of local government assets, particularly in the less resourced regional and remote councils.

Councils have reported an increase in cyberbullying of local government candidates and sitting Elected Members. The Western Australian Local Government Association has requested ALGA to make representations federally to increase cyberbullying protections for all Australians, similar to those provided to children under the *Enhancing Online Safety Act 2015*.

## Conclusion

As highlighted in the submission, rural, regional and remote councils and communities continue to be disadvantaged in the rollout of broadband services.

ALGA's Budget submission identifies the need for a program to improve the capacity of regional councils through a Digital Local Government and Rural/Regional Telecommunications Program of \$100M over four years to increase the community benefits of improved technology, connectedness and innovation.

ALGA also calls for the Commonwealth Smart Cities and Suburbs Program to be supplemented by a Smart Communities Program of \$100M per annum over four years to support councils in their digital transformation journeys. ALGA's analysis indicates that these two programs would have a cumulative GDP benefit of \$340.4 million over three years and create up to 1000 new jobs.

ALGA calls for the continuation of the Mobile Black Spots Program to assist regional, rural and remote communities connect to and fully participate in the digital economy. We also call for early consultations with councils on the identification of sites, in the national interest. ALGA also encourages the Government to explore ways to potentially cross-subsidise the costs of regional/remote communities by those who live in the cities and who receive broadband at far lower costs.

ALGA encourages all Governments to explore avenues to identify priority communities with high vulnerability to natural disasters, and seek to collaborate with NBN Co and carriers to improve coverage to those communities, particularly in regional and remote communities.

ALGA seeks Commonwealth assistance in the development and awareness of managing data and security to improve the cyber security of local government assets, particularly in the less resourced regional and remote councils, and to increase cyberbullying protections for all Australians.

ALGA

3 August 2018

## **Appendix 1 - NGA resolutions on regional telecommunications**

### **2018 National General Assembly**

39 West Wimmera Shire Council, VIC

- 1) That the National General Assembly call on the Australian Local Government Association to write to the Minister for Communications, to convey the ongoing discontent with telecommunications blackspots and erratic internet services in Rural Australia.
- 2) That the correspondence clearly state that the lack of telecommunications and internet service is acting as an inhibitor to economic development, growth in existing business, the provision of modern education programs and creates difficulties for emergency service management during emergency events.
- 3) That the Federal Government fund the closing of the telecommunications gap that exists between rural and urban residents. 10

39.1 Frankston City Council, VIC

That the National General Assembly expresses concern with the continued delay in the rollout of the National Broadband Network (NBN). Concern is to be raised regarding outstanding locations without NBN connection/coverage. Moreover, concern relating to the reliability of connected services – where substandard performance in some locations has been well documented – must also be expressed.

39.2 East Gippsland Shire Council, VIC

That the National General Assembly advocate to the Australian Government in respect to the importance of ensuring that all communities have timely access to effective mobile phone services and reiterate the importance of acting promptly on recommendations made by Infrastructure Australia and the Productivity Commission to:

- Review the current Mobile Black Spot Funding Program prior to announcing any further funding rounds;
- Revise the current Telecommunications Universal Service Obligation to reflect changes to the telecommunications needs of communities by creating a new baseline for universal access to mobile voice and data requirements; and
- Focus appropriate resources to ensure that a baseline of service can be provided in noncommercially viable areas and to special service users in regional and remote areas.

40 Macedon Ranges Shire Council, VIC

That the National General Assembly advocate the following: 1) That the Federal Government demand and require greater coordination in the planning and location of infrastructure required for NBN and telecommunications by requiring all carriers ensure that planned new infrastructure applications are supported by an integrated approach for black spot locations covering NBN and all telecommunications carriers.

2) That the Codes of Practice for Telecommunications Facilities be reviewed and updated reflecting advancement in technology, alternatives to towers and requiring that all carriers demonstrate the merit of any new tower proposal having regard to an integrated strategic placement and merited multi co-location ability for any new tower. Alternatives to towers should also be proposed in any new tower application.

## **2017 National General Assembly**

Resolution Number: 28

City of Prospect, SA. That the National General Assembly call on the Federal Government to declare high-speed, high-capacity broadband to be a utility, defined as an essential infrastructure service provided principally for public benefit and which enables economic growth and greater quality of life to achieve the goal of universal coverage. Carried

Resolution Number: 29

Sunshine Coast Regional Council, QLD. That this National General Assembly call on the Federal Government to implement an urgent review of the roll out of the NBN Fibre to the Node (FTTN) services and propose a revised back up power supply solution to overcome the loss of communications that will now be experienced during extended power outages. Carried

Resolution Number: 30

Toowoomba Regional Council, QLD. That the National General assembly call on the Federal Government to insert into the Telecommunications Act 1997, stronger provisions and guidelines aimed at achieving greater co-location by telecommunications providers of telecommunication installations and facilities throughout urban and sub-urban environments across Australia.

## **2016 National General Assembly**

Resolution 31

Central Highlands Regional Council QLD. That the National General Assembly call on the Australian Government for more funding to be allocated to the Mobile Black Spot Programme. Carried unanimously

Resolution 32

City of Whittlesea VIC. That the National General Assembly calls on the Commonwealth Government to amend the legislation and customer charter of NBN Co to require it to provide priority emergency management telephone lines free of charge as part of its social obligations. Carried unanimously

Resolution 33

Ku-ring-gai Council NSW. This National General Assembly call for more technologically advanced Councils, who use, for example, electronically advanced hardware and software computer programs and apps which provide swift and efficient pathways to service residents' needs, enter into voluntary mentoring relationships with less innovative Councils, and for the Commonwealth Government to support this through a funding program. Carried

Resolution 34

Lake Macquarie City Council NSW. That the National General Assembly call on the Australian Government to establish a National Local Government Digital Innovation and Smart Communities Acceleration program and funding commitment, to recognise and facilitate the pivotal role of local government in creating local conditions conducive to technology and knowledge-driven economic development, consistent with the National Innovation and Science Agenda. Carried



## **2013 National General Assembly**

Resolution Number:44

Council: Shoalhaven City Council, NSW. That the Australian Local Government Association calls on the Federal Government to refocus the National Broadband Network and target Government Infrastructure including local government to connect Council assets and improve communications within Local Government areas. Carried

Resolution Number:44.1

Council: Balranald Shire Council, NSW. That the National General Assembly call on the Minister for Broadband, Communications and the Digital Economy to support the provision of broadband to all rural and remote schools with at least mobile connectivity. Carried

Resolution Number:58

Council: Horsham Rural City Council, Hindmarsh Shire Council, Northern Grampians Shire Council and West Wimmera Shire Council, VIC. That the National General Assembly calls on the Federal Government to make additional funding available for mobile telephone and data services in regional areas, based on

- Economic benefit to agriculture
- Emergency management requirements eg fire and flood
- Tourism activities

## **2012 National General Assembly**

Resolution Number: 25

Council: Hobart City Council, TAS. The Telecommunications Act 1997 and Telecommunications (Low Impact Facilities) Determination 1997 be amended to allow Councils to have a greater say in the location of telecommunications facilities. Carried

Resolution Number: 26

Council: Broken Hill City Council, NSW. That the National General Assembly call for the Commonwealth Government and NBN Co for an accelerated rollout of the NBN to regional, rural and remote areas notwithstanding NBN Co's pre-determined rollout timetable. Carried

Resolution Number: 27

Council: Ku-ring-gai Council, NSW. That the National General Assembly call for the undergrounding of National Broadband Network (NBN) cables and household connections where it will not cause any environmental damage with the rollout and installation of the NBN across Australia.