

BETTER DELIVERY OF UNIVERSAL SERVICES

RESPONSE TO DISCUSSION PAPER OCTOBER 2023 ACCESSCOMM PTY LTD (ABN: 94 666 854 655)

To: The Department of Infrastructure, Transport, Regional Development

By email: usb@infrastructure.gov.au

This response from AccessComm Pty Ltd (“AccessComm”) focuses on the “*early stakeholder views on the design of trials*” under the heading:

“*Investigating performance and reliability of new trials*” – Page 13.

As the Albanese Government commences a pivotal consultation on the modernisation of the Universal Service Obligation (USO), AccessComm will present a comprehensive solution to enhance telecommunications services for the hard of hearing, in addition to addressing a number of the “Key questions for stakeholders”

The AccessComm pretrial proposal aligns with the government's objectives to explore advanced telecommunications methods and significantly improve communications for rural, regional, and First Nations communities.

Current Scenario:

The USO's reliance on ageing copper wire, particularly concerning for its high maintenance costs, underscores the urgency for a more efficient, technologically advanced approach. With the widespread accessibility of high-speed broadband via the NBN network and extensive coverage of commercial mobile networks reaching nearly 99.6% of the population, we are at an opportune moment to innovate and uplift national telecommunications services obligations (presently prodded in part through the delivery of the National Relay Service – NRS).

Solution Overview:

AccessComm advocates for the implementation of a modern, cost-effective framework for telecommunications including the NRS, although not necessarily in its present form.

Our proposal is based on leveraging emerging technologies, including high-speed internet, wireless connectivity, and satellite advancements, to ensure quality voice services for all Australians, irrespective of their location.

Key Components of AccessComm's Pretrial Proposal:

1. Adopting Next-Generation Communication Technologies: Transitioning the NRS to a digitally-driven platform, utilising internet-based solutions to deliver real-time, high-quality communication for the Deaf and hearing impaired.

2. Inclusive Accessibility Measures: Developing user-friendly interfaces and systems that cater specifically to the diverse needs of the Deaf and hearing impaired, ensuring their seamless integration into a modernised Relay Service.

3. Community Engagement and Collaboration: Engaging with stakeholders, including the Deaf and hearing impaired communities, experts in accessibility technology, and telecommunications, to ensure the designed solutions meet the unique needs and challenges faced by this demographic.

4. Trials and Pilots: Committing to conducting comprehensive trials and pilot programs, ideally commencing in 2024, as part of the broader government initiative, to test and refine the efficacy and reliability of these proposed technological advancements.

5. Methodology: AccessComm will commission Professor Luke Connelly (Australian Centre for Economic Research on Health – ACERH) to collaborate with Government on trial methodology and evaluations. Prof Connelly has conducted numerous evaluations and series of research reports into the available resources and options for telecommunications for Deaf and Hard of Hearing Australians for over 10 years.

5. Sustainable Funding Model: Proposing a sustainable, long-term funding model that ensures the continuity and stability of services in remote areas, while incorporating insights from the upcoming review of the Regional Broadband Scheme.

AccessComm Pty Ltd- History and current Activities:

AccessComm acknowledges the critical need for an independent and transparent body of evidence to validate the capabilities of emerging technologies in fulfilling the obligations of the USO. We aim to be at the forefront of these trials, assisting the Government in ensuring the services meet the stringent standards required to support Deaf and hearing impaired Australians efficiently and effectively.

AccessComm was incorporated in 2013 as an Australian company established to facilitate equity of access to telecommunication through the provision of products, education and other services for people who are Deaf, or hard of hearing that will allow them to communicate with family, friends and the wider community.

AccessComm is dedicated to developing and implementing life-changing technologies to provide accessible services to enrich the lives of Deaf and hearing impaired communities and facilitate independence and social connection.

AccessComm's Board of Directors, Management team, consultants and stakeholders includes individuals and groups with vast experience in the telecommunications and IT sectors and delivery of products and best-practice services to the disability sector.

Key Questions for stakeholders:

AccessComm considers that the first dot point on Page 10 provides an opportunity to respond to the overarching characteristics and outcomes that a universal service framework should be able to deliver:- “*What do you consider are the key outcomes that a modern universal service framework should deliver?*”

A modern universal service framework should aim to achieve several key outcomes to ensure equitable access to essential communication services for all individuals. For example:

- **Universal Access/Design:** The primary goal is to ensure that all individuals, regardless of location, socioeconomic or disability status, have access to basic communication services like voice telephony, internet connectivity, and essential communication tools.
- **Affordability:** Services provided within the universal framework should be reasonably priced, ensuring that they are affordable for all segments of society, including low-income individuals and marginalized communities.
- **Reliability and Quality:** The framework should guarantee reliable and high-quality services to all users. This includes dependable voice communication, high-speed internet access, and consistent service standards across regions.
- **Inclusivity:** The framework should cater to the needs of individuals with disabilities, ensuring that communication services are accessible to all, regardless of physical or cognitive impairments.
- **Adaptability and Innovation:** It should be adaptable to technological advancements and encourage innovation in service delivery. This allows for the integration of new technologies and ensures that services remain relevant and efficient over time.
- **Rural and Remote Connectivity:** Addressing the digital divide between urban and rural areas is crucial. The framework should prioritize extending services to remote and underserved areas to ensure equitable access for all populations.
- **Educational and Socioeconomic Development:** Communication services are integral to education, economic growth, and social development. A modern universal service framework should contribute to enhancing these aspects by providing access to information, online education, job opportunities, telehealth and more.
- **Consumer Protection and Privacy:** It should ensure consumer rights are protected.

Conclusion:

AccessComm is committed to collaborating with the government, industry, and communities to revolutionise telecommunications services, including Relay services (or the equivalent), supporting the hearing impaired and providing equitable access to communication services across the nation. Our proposal aligns with the principles of the consultation process and stands ready to contribute to the evolution of the USO for a more inclusive and technologically advanced future.

The Department has suggested on Page 2 of the Background Paper that they would be: *“interested in meeting stakeholders to better understand their views. Please reach out if you would like to arrange a time to talk to the Department...”*

Key personnel of AccessComm would appreciate the opportunity to meet with the Department to better understand the process and provide the rationale that supports the proposals of AccessComm.

Would you please notify the undersigned of a suitable date, time, venue and attendees for a meeting as suggested above?

Sincerely,

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