



## AgForce Queensland Farmers Limited

ABN 57 611 736 700

Second Floor, 110 Mary Street, Brisbane, Qld, 4000  
PO Box 13186, North Bank Plaza, cnr Ann & George Sts, Brisbane Qld 4003

Ph: (07) 3236 3100  
Fax: (07) 3236 3077  
Email: [agforce@agforceqld.org.au](mailto:agforce@agforceqld.org.au)  
Web: [www.agforceqld.org.au](http://www.agforceqld.org.au)

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Hon Michelle Rowland MP

Minister for Communications

Department of Infrastructure, Transport, Regional Development, Communications and the Arts

By Email: [usb@infrastructure.gov.au](mailto:usb@infrastructure.gov.au)

Dear Minister Rowland

### **Re: Discussion Paper – Better Delivery of Universal Services**

AgForce is a peak organisation representing Queensland's cane, cattle, grain and sheep, wool & goat producers. The cane, beef, broadacre cropping and sheep, wool & goat industries in Queensland generated around \$10.4 billion in on-farm value of production in 2021-22. AgForce's purpose is to advance sustainable agribusiness and we strive to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,000 farmers, individuals and businesses provide support to AgForce through membership. Our members own and manage around 55 million hectares, or a third of the state's land area. Queensland producers provide high-quality food and fibre to Australian and overseas consumers, contribute significantly to the social fabric of regional, rural and remote (RRR) communities, as well as deliver stewardship of the state's natural environment.

Thank you for the opportunity for AgForce to provide feedback on the 'Better Delivery of Universal Services' discussion paper. AgForce has a strong membership base of primary producers, many of which are geographically isolated in rural and remote areas of Queensland who have daily connectivity and telecommunications issues and frustrations.

People from the bush are a resilient and resourceful group who readily adopt new and changing technology and connectivity solutions are no exception. The options available in the bush for connectivity, both voice and internet, often do not match those of their urban counterparts with many rural and remote operations having to install and pay for multiple solutions to have redundancies in place for the inevitable failure of a service. Any consideration to change the current universal service obligation should not result in less connectivity for those in the bush, it should facilitate reliable, modern and affordable communications.

Australia is a vast and geographically diverse country and its areas can be broadly classified into rural, regional, and remote areas. The differences between these areas relate to their population density, distance from major urban centres and geographic isolation. These distinctions impact the connectivity and communication needs of the residents in these areas.

Those who live in sparsely populated remote areas rely solely on connectivity to access basic services like healthcare, education, business and emergency services as they are a long distance from any town or city that can provide an 'in person' service. Most business, schooling and medical appointments occur via phone or an online meeting.

New satellite technologies have helped facilitate these services in recent years however, our members have concerns with the reliability and resiliency of satellite networks, particularly during monsoonal rain, dust storms, fires and high winds.

In rural areas, the need for reliable and high-speed internet connectivity is crucial for producers, businesses, and residents. However, the infrastructure is further apart and less developed compared to urban areas, leading to challenges in accessing advanced communication technologies. Regional areas may have better infrastructure than rural areas, but they still face challenges in terms of reliable and quality connectivity. Businesses, schools, and healthcare facilities in regional areas also require effective communication systems to connect with the wider community and access services.

The more isolated you are, the more critical your connectivity is. AgForce agrees with significant Universal Service Framework (USF) reforms that will improve the current growing communications divide between the bush and our urban counterparts and reflect the essential nature of telecommunications to our members.

It is acknowledged that in Australia, most telecommunications services are supplied on a commercial basis in a competitive market. However, it has long been recognised that industry may lack sufficient incentives to service non-commercial areas, particularly in more remote and less-populated areas. Given the relatively high costs of providing and supporting communication services and the limited revenue available, it is essential to have a Universal Service Guarantee (USG) in place for both voice and broadband and this must continue to exist in a new modern form to ensure the success and economic growth of our RRR communities.

### **1. What do you consider are the key outcomes that a modern universal service framework should deliver?**

A modern USF should aim to deliver several key outcomes to ensure telecommunications services are equitable for all Australians, regardless of where they live.

**Universal Access:** Ensure that all consumers, regardless of their geographical location, socioeconomic status, or other demographics, have access to quality, reliable, resilient and affordable voice and broadband services. A USF should specifically address the challenges of providing telecommunications services in rural and remote areas, ensuring that residents in these regions have access to the same level of services as urban counterparts.

**Affordability:** Ensure that the cost of accessing baseline fixed voice and broadband services is affordable for all, this includes ensuring that having separate voice and broadband services is affordable for all consumers.

**Reliability and Quality of Service:** A key outcome of a reformed framework is quality and reliability. Voice and broadband services must meet a minimum standard of reliability equivalent to at least 99% reliability/uptime. As no technology (even in urban areas) is 100% reliable, it is essential that RRR consumers can access voice and broadband via two separate technologies. Voice and broadband services should have robust quality minimum metrics for factors such as latency, packet loss (in particular rain fade), jitter, echo, noise, call drops and upload and download speeds. If a voice service is to be delivered via VOiP, it must have the ability to have voice prioritisation.

**Consumer Focused:** A reformed framework must have robust consumer protection guarantees that implement measures to protect consumers' rights and interests, including transparent pricing, fair competition and effective dispute resolution mechanisms.

**Resilient:** It is essential that voice and broadband services are as resilient as possible during natural disasters, extreme weather events and power outages. Unreliable electricity supply is very common in rural and remote areas with outages taking days and sometimes weeks to fix, leaving consumers without communication services.

If copper and High-Capacity Radio Concentrator (HCRC) voice services (which currently work during power outages) are to be phased out, replacement technologies must work during power outages. Power redundancy, such as backup batteries, power cubes and solar generators are essential for any tower infrastructure, ground station and exchanges. In-home power redundancy must be planned for new technologies and alternate solutions, particularly for voice services.

**Flexible and adjustable to keep up with growing demand:** There is a need within the framework to encourage the adoption of hybrid systems via different technologies. Telecommunications is never going to be an all or nothing option for vast geographical distances like Australia. We need to aim for continuity of service. With rapid change occurring in just the past few years in telecommunications, Australia is currently between generations of technologies and any changes to the framework should not restrict the use of future technologies that may emerge. A reformed framework should encourage innovation in technology and be adaptable and able to be changed to keep up with growing consumer demands and needs and technological advancements, to keep pace with the evolving digital landscape.

**Terrestrial Solutions:** It can be easy to look to the sky for solutions with low earth orbit (LEOS) or geostationary satellites (GEOS), but there are concerns that many of the current providers are offshore and could potentially threaten national security and Australia's functionality. AgForce implores terrestrial solutions be explored to ensure a level of sovereignty within our communications systems. Additionally, satellite technologies are less reliable in northern Australia than terrestrial solutions, due to the impact of weather. Both Starlink and nbn Sky Muster are affected by rain fade which creates reliability issues for our members who live in high rainfall areas.

**Broadband Speed and Capacity:** A reformed framework should strive to offer broadband services with sufficient speed (both upload and download) and capacity to meet the evolving demands of modern communication, including data-intensive applications and services.

**Data Security and Privacy:** A new framework must prioritise the protection of user data, privacy, and security, establishing robust frameworks to safeguard personal information and sensitive data.

**Connectivity Literacy and Support:** Telecommunication providers must commit to ensuring that individuals can make the most of the available connectivity services and offer support to consumers throughout installation, connection and troubleshooting. A modern USF needs to be consumer focused. Products should be user friendly, with consumers not expected to do any more than very basic troubleshooting. Provider Critical Information Summaries (CIS) should be standardised in clear, transparent and easy to understand formats.

## **2. What safety-net services does a modern universal service framework need to address?**

A modern USF needs safety-net services to address specific challenges and ensure that all consumers, regardless of their circumstances, have access to essential communication services. Some safety-net services that a framework should consider include:

**Emergency Services Communication:** Ensure that all individuals have access to reliable voice and broadband services for emergency communication, including access to emergency hotlines and services, regardless of where they live. Develop plans and resources to quickly deploy temporary fixed voice and broadband services in disaster-stricken areas to aid communication and coordination during emergencies.

**Affordability Programs:** Implement programs to assist low-income individuals or households in affording baseline fixed voice and broadband services, ensuring that economic constraints do not hinder access.

**Special consideration for Vulnerable Groups:** Recognise the needs of vulnerable populations, such as the elderly, disabled, or remote communities and implement targeted services or assistance programs. Priority assistance for voice services must remain as part of a reformed USF and the customer service guarantees for these consumers should be strengthened.

**Consumer Support and Complaint Resolution:** Establish mechanisms for consumer support and efficient resolution of complaints, ensuring that users have timely recourse if they face issues with their fixed voice and/or broadband services. A modern USF must have stringent consumer support, repair and connection guarantees with clear and reasonable repair time frames as a safety-net for consumers. Existing Customer Service Guarantees (CSG) for voice services have left many of our members frustrated and vulnerable. The connection, repair and appointment-keeping standards set out in the existing CSG Standard (and the associated benchmarks) must be reviewed and modernised, in particular in regard to connection and repair timeframes. The CSG must ensure that if interim or alternate services are offered to consumers, in the event a telco cannot meet the CSG connection or repair timeframe, these must also have rigorous consumer guarantees. In the event of an ongoing fault or issue, the telecommunications company responsible should be issued with an escalating fine until the fault is repaired. A credit on the account does not help the consumer if their voice or broadband service continues to have the same ongoing fault.

**Data Security and Privacy Protections:** Implement measures to protect user data and privacy, ensuring that individuals are not exposed to risks associated with cyber threats or unauthorised access.

**Continuous Monitoring and Evaluation:** Establish mechanisms for continuous monitoring and evaluation of the USF to identify gaps, assess the effectiveness of safety-net services and adapt to evolving needs and challenges.

**Redundancy and Resilience Planning:** Ensure redundancy and resilience in the network infrastructure to minimise service disruptions and quickly restore services in the event of outages or disasters. Consumers must be able to access clear and transparent outage information, with predicted restoration times.

In conclusion, a modern USF must encompass a comprehensive array of safety-net services to address the diverse needs of consumers and ensure equitable access to essential communication services. By considering the above factors, the framework can effectively navigate evolving challenges and uphold the fundamental right of all individuals to access reliable voice and broadband services, regardless of their circumstances.

### **3. To what extent do you consider mobile services are important to complement fixed services supported under the existing framework?**

Mobile services present numerous challenges if introduced to a USF. Existing mobile coverage is not available to all consumers, particularly those in more remote and rural areas. Coverage inside a home or business can be dependent on the device used, terrain at the location, if expensive antennas and repeaters are needed, construction materials of the house, load on the tower, power availability, weather conditions at the time and numerous other external factors that can affect coverage and user experience. Considering the limitations and challenges associated with mobile services, especially in RRR areas, it becomes clear that while mobile services are an important complement to fixed services, they may not fully replace the need for a robust fixed infrastructure. Several factors need to be considered:

**Consumer Guarantees:** Often mobile coverage inside a home is dependent on expensive repeaters and/or antennas, which require power to work. The absence of existing consumer guarantees for mobile services can also pose challenges for consumers, leading to issues related to service quality, reliability, and customer satisfaction.

Fixed services often come with more established and regulated consumer protections. While there may be a strong consumer preference overall for mobile services, many rural and remote premises lack mobile coverage and there are no specific regulatory safeguards for mobile services beyond general consumer law.

**Inequality in Access:** Mobile coverage is not available to all Australians, particularly those in remote and rural areas. The existing framework for fixed services aims to address this inequality and ensure universal access. Direct handset to LEO sat technology looks promising however, this requires line of sight to the sky, thus cannot be used indoors and is limited in capacity when compared to terrestrial solutions. Additionally, mobile coverage maps are often inaccurate and there are no requirements on mobile carriers to give expected speeds or availability metrics to consumers.

**Mobile Services Issues:** Feedback from our members is that mobile coverage can be intermittent, unreliable, congested and prone to capacity and power related issues in RRR areas. Rural mobile networks are vulnerable to congestion, especially during peak usage times, such as tourist season or a local large scale community event and in emergency situations. These areas are also susceptible to power-related issues and mobile services heavily rely on a stable power supply, with very few RRR towers having backup generators or solar power. These factors can place consumers at risk of having no communications services during critical times. Dedicated fixed services, that can prioritise voice traffic and have backup power solutions, may provide more consistent performance and resiliency, particularly in critical scenarios.

While mobile services are important complements to fixed services, addressing the existing challenges, such as consumer guarantees, capacity and network reliability in rural areas, is crucial. It is essential to recognize that a combination of fixed and mobile solutions may be necessary to achieve comprehensive universal service guarantees for voice communication. A holistic approach considering technological advancements, regulatory measures, community engagement and strategic investments can contribute to improved mobile service accessibility across diverse geographical and environmental conditions.

#### **4. Which existing requirements under the current universal service framework should be retained, or changed?**

While there has been significant change in the telecommunications sector in recent years (eg, mobile and broadband take-up), many consumers in RRR areas still use fixed USO voice services to which the CSG applies. Outside the NBN fixed line footprint many rural and remote consumers still rely on services provided by Telstra's legacy infrastructure, including copper landlines, 3G wireless local loop (NGWL) and HCRC networks. To determine which existing requirements under the current USF should be retained, a thorough evaluation of changing consumer needs and technological advancements in RRR areas should be undertaken.

##### **Baseline Service Standards:**

**Retain** – A USF should continue to establish and enforce minimum service standards to ensure that all Australians have access to basic and essential fixed voice and broadband services. CSG obligations should be extended to all telecommunications wholesale and retail providers who supply a fixed broadband service to Australian residences and businesses.

**Change** – Regularly review and update these standards to reflect advancements in technology and changing user expectations. It is integral that a measurement of delivery against an availability standard should become part of the CSG, particularly for the most vulnerable – those in rural and remote areas and those without mobile coverage redundancy. Consumers should be able to access both voice and broadband services. In areas with no mobile coverage consumers must be able to access voice services via a separate technology to broadband services.

##### **Geographic Coverage Obligations:**

**Retain** – Maintain obligations for service providers to extend coverage to rural, remote and underserved areas, ensuring that all Australians, regardless of location, have access to essential communication services.

**Change** – A modern USF should allow for periodic assessment and adjustment of obligations based on population shifts, technological advancements, and emerging connectivity needs. There needs to be clear and transparent CSG repair timeframes for urban, rural and remote areas that reflect advancements in technology and travel considerations. Repair time frames should be strengthened to reflect the critical importance of telecommunications to those in remote areas, who often have no redundancy to fall back on.

**Affordability and Vulnerable Consumer Measures:**

**Retain** – Continue to implement affordability measures to address economic barriers, ensuring that fixed voice and broadband services remain accessible to all socio-economic groups. Continue to provide priority assistance for vulnerable consumers.

**Change** – Regularly review and adjust affordability programs to respond to changes in the cost of living and economic conditions. In particular, the current Telephone Allowance for low-income consumers needs to be urgently updated to be more reflective of the current costs of voice and broadband plans. Make it easier for vulnerable consumers to access priority assistance measures.

**Consumer Protections:**

**Retain** – Existing CSG for both voice and broadband are still leaving consumers fatigued and frustrated when attempting to get issues resolved. There is a need to uphold and strengthen consumer protections, including transparent pricing, quality of service, and mechanisms for dispute resolution.

**Change** – A USF should enhance consumer protection measures, particularly in regard to ongoing faults and issues that are repetitive in nature. It is essential that existing reliability/uptime requirements for voice and broadband services are strengthened and increased. There needs to be significant change to existing CSG in regard to interim services. Currently telcos do not have to meet the maximum time frames or pay compensation if they have made a reasonable offer to supply an interim service (such as a mobile or satellite service at standard landline rates) or an alternative service (such as a call redirection to a mobile or additional landline service). However, consumer feedback is that often interim services take too long to arrive, are plagued with issues or do not work at all. AgForce would support a framework that called for escalating fines for delayed repairs and non-compliance.

**Performance Monitoring and Reporting Benchmarks:**

**Retain** – Continue to monitor and report on the performance of the USF to assess its effectiveness in achieving its goals.

**Change** – Enhance monitoring mechanisms to capture emerging trends, technology adoption rates, and the impact of the framework on various communities. AgForce strongly supports transparency and compliance reporting. In particular, that there should be greater visibility, analysis and action on connections and repairs that fall in the ‘tail’ (ie, those cases falling outside the current 90% CSG benchmarks). CSG benchmarks should be increased to at least 95%, with more granular RRR categories for reporting, so any rural and remote under-performance is clear and transparent. There are significant medical, social, business and education implications when delays occur in repair and connection time frames.

**5. What role do you consider payphones should play in a modern universal service framework?**

In a modern universal service framework, payphones can still play a relevant and important role, particularly in RRR areas, despite increasing mobile coverage and home broadband connections. In particular, public and free payphone access is essential for those in vulnerable circumstances, such as the homeless, those fleeing domestic violence or those displaced due to natural disasters.

**Emergency Communication:** Payphones can serve as a crucial means of communication during emergencies, especially when individuals do not have access to their own mobile phones or encounter issues with mobile networks. Ensuring the presence of payphones in strategic locations enhances the resilience of the communication infrastructure.

**Accessibility for Vulnerable Populations:** Payphones can be essential for individuals who may not own a mobile phone or have limited access to home broadband services. This is particularly relevant for vulnerable populations, including those experiencing homelessness or individuals in low-income or first nation communities.

**Public Spaces and Community Wi-Fi:** Placing payphones in public spaces particularly in remote areas can provide convenient communication options for a number of individuals. Payphones can be valuable for tourists and visitors who may not have access to local mobile networks or face challenges using their own devices due to roaming restrictions. Placing payphones in tourist-heavy areas supports communication needs for visitors. Community wi-fi is particularly useful for those who may not be able to afford a fixed home connection and in first nations communities where there is a lack of affordable prepaid solutions.

**Redundancy in Communication Networks:** Payphones contribute to the redundancy and resilience of the overall communication network. In situations where mobile networks may be overloaded or experience outages, payphones provide an additional communication option.

Regular evaluations should be conducted to ensure that the placement and maintenance of payphones align with evolving communication needs of communities and technological advancements.

## **6. How should affordability be considered?**

Affordability of telecommunications service is critical for RRR consumers, especially in the current cost of living crisis. A modern universal service framework should have:

**Universal Service Obligations (USO):** Set minimum standards for affordability, ensuring that even in remote or underserved areas, residents have access to reasonably priced baseline fixed voice and broadband services. It is imperative that RRR consumers can afford to have a backup connection/two separate telecommunication services for redundancy. Redundancy is even more critical in areas with no mobile coverage or poor and unreliable mobile coverage. When consumers are unable to afford redundancy, they can potentially be left vulnerable and at risk, as no connectivity solution is 100% reliable. In particular, many connections (both existing and emerging) are prone to issues during power outages, rain, wind, smoke, dust and other external factors, all which are common in rural and remote areas.

**Tiered Pricing Models:** Encourage providers to have tiered pricing models that offer different service packages at varying price points. This allows individuals to choose plans that align with their budget while still meeting their essential communication needs. These should include prepaid options and consider the un-metering of essential content such as Medicare, Centrelink and other essential Government services that no longer have face-to-face support in remote communities.

**Transparent and Equitable Pricing:** Ensure transparency in pricing structures, with clear communication of costs and any additional fees associated with fixed voice and broadband services. This helps consumers make informed decisions and avoids hidden charges. Pricing should be equitable to metro-based connections and consider the extra costs involved for RR consumers in having redundancy, such as repeaters and antennas to boost mobile coverage, voice plans via a separate technology to broadband, installation and hardware and equipment fees of alternate technologies etc.

**Affordability Measures:** Implement income-based programs or subsidies to assist low-income individuals or households in affording baseline fixed voice and broadband services. These programs can include discounts, vouchers, or direct financial assistance, such as the School Student Broadband Initiative (SSBI) however, they must address the barriers that currently exist in accessing these vouchers.

AgForce supports ACCAN affordability measures and policies.

## **7. How can a modern universal service framework deliver better outcomes and meet digital inclusion needs of first nations australians?**

A modern USF should foster ongoing engagement with First Nations communities to ensure that their input is considered in the design and implementation of services. In particular ensuring that cultural needs of communities are understood and planned for, such as preferences for pre-paid services and community wi-fi and barriers such as identity checks and shared devices, are thoroughly investigated and researched so that solutions are fit-for-purpose. A USF should also develop targeted programs and services that address the specific digital inclusion challenges faced by First Nations Australians, such as remote location, cultural considerations and varying levels of digital and connectivity literacy. Additionally, the framework should implement affordability programs tailored to the economic circumstances of First Nations communities, ensuring that cost is not a barrier to accessing fixed voice and broadband services. Tailored and bespoke solutions for First Nations communities must come with specific technical support that is accessible and targeted to First Nations people.

In conclusion, a robust USF is imperative for Australia's RRR areas, ensuring equitable access to essential communication services for all citizens. This framework must address specific challenges faced by RRR communities, such as limited infrastructure, geographic isolation and economic constraints. Key outcomes should include universal access, affordability, reliability, and consumer-focused protections. Safety-net services, including emergency communication, affordability programs, support for vulnerable groups and robust complaint resolution mechanisms, are essential components of such a framework. Additionally, continuous monitoring, redundancy planning, and data security measures are vital to ensure resilience and adaptability in the face of evolving needs and challenges. By prioritizing these aspects, a modern USF can bridge the communication gap between urban and RRR areas, fostering economic growth, social cohesion, and digital inclusion across the nation.

For further information or to discuss this submission in more detail please contact [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]