

Isolated Children's Parents' Association of Australia Inc.

"Access to Education"



Submission

to the

Universal Service Guarantee Taskforce

**Department of Infrastructure, Transport, Regional Development and
Communications**

into the

Draft Telecommunications (Carrier Licence

Conditions - Telstra Corporation Limited)

Amendment (Regional Service Information)

Instrument 2021

from the

Federal Council

of the

Isolated Children's Parents' Association of Australia Inc.

ICPA (Aust)

November 2021

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The Isolated Children's Parents' Association of Australia, ICPA (Aust), welcomes the opportunity to contribute to consultation on the *Draft Telecommunications (Carrier Licence Conditions - Telstra Corporation Limited) Amendment (Regional Service Information) Instrument 2021* providing feedback related specifically to 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.

Students whose family home is in rural and remote Australia and who are enrolled in Schools of Distance Education, rely heavily on telecommunications to access daily lessons, via both telephone and internet. Most would be in the 0.7% of the population that have no access to any mobile network. Our member families also attend small rural schools that are currently dependent on landlines for contact for teacher support/assistance/mentoring, emergencies and general administration tasks of a school. There are still a few rural small schools which are not in mobile coverage areas, and working landline phones are essential for the operation of these schools.

The key message which ICPA (Aust) continues to promote across all components of our advocacy is equitable access to educational opportunities for geographically isolated students. Often in rural and remote areas of Australia adequate communications underpins 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.

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 reliable. ICPA (Aust) continues to advocate that, where educational delivery hinges on the availability of communications technology, it is essential that priority is given to the installation and maintenance of these services. ICPA (Aust) has had motions carried at our annual Federal Conference requesting improvements to Telstra's fault reporting process and repair times as well as requests for phone services which are utilised for education to be prioritised both in installation and repair to ensure that all rural and remote students have consistent access to continuous and reliable telephone communications.

ICPA (Aust) is also very concerned that there are situations where telecommunications providers are limiting maintenance and repairs of older, existing technologies despite there presently being limited to no alternatives to these technologies in many areas. It is imperative that ongoing inspection, scrutiny and enhancements are made to continuing technology to ensure it is working correctly. While new, emerging or alternative technologies may be being sought and developed through programs such as the Alternative Voice Service Trials (AVST), until adequate alternatives or upcoming replacement technology become widely available current services need to be maintained. It is essential that Telstra commits to maintaining these current services while adequate alternatives are explored. 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.

ICPA (Aust) welcomes amendments to Telstra's carrier license conditions which require Telstra to improve its reporting on the delivery of voice services in regional and remote areas, where Telstra continues to operate its own fixed line infrastructure.

Based on member feedback over a number of years, ICPA (Aust) believes there are a number of issues which should be included in Telstra's reporting of its delivery of voice services in remote areas as part of its delivery of service analysis.

1. The need for customer service and telephone assistance lines to more effectively assist rural and remote students and their families.

Customer call centres have been problematic for rural and remote families to access, with current 13 22 00 line for support noted as inadequate and problematic. For example, members find that after accessing this service, a message responds indicating a link has been sent to their mobile for them to follow and chat with a Telstra assistant. A large number of families living in rural and remote areas do not have mobile coverage which means receiving messages with links for assistance is not practical for these customers. For those who can receive text messages, our members are reporting that this message often does not arrive and they have no recourse to contact a service representative. ICPA (Aust) hopes that information is also reported on regarding the number of instances of "failed to complete" contact by customers who are unable to report their faults or seek assistance due to reporting systems not performing correctly.

2. The need for priority phone line installations and repairs in rural and remote areas when the purpose is education delivery.

The inception of a digital curriculum has seen a dramatic increase in the direct teaching of lessons by the teacher at the School of Distance Education (SDE) or School of the Air (SOTA) to the students in their homes. For many regional distance education schools and students, the landline is a compulsory piece of equipment that enables access to these daily lessons. In Queensland for example, in order to fulfil daily lesson requirements, two phone lines are often required for multi-age home schoolrooms. The installation and repair times for phone lines in rural and remote areas can be lengthy, at least six weeks in some cases. It is imperative Telstra prioritise these services in geographically isolated locations where it is used for access to education.

3. The need to ensure rural and remote students have consistent access to continuous and reliable telephone communications through regular maintenance of existing telephone infrastructure and the provision of a temporary satellite phone or other service to any rural or remote family where a phone fault is not rectified within three working days.

It is essential for children learning via distance education to have access to their teachers via phone as well as internet. Often Private Lesson Times (PLTs) are carried out on the landline while other children in the schoolroom are using the computer to access their lessons. This is especially important for younger students. Students and their tutors need access to class teachers via the telephone network and when these networks fail, it is imperative high priority is placed on restoring these services. Where phone faults cannot be rectified within three Working Days, a temporary mobile satellite phone or other alternative should be provided in a timely manner at the site.

Many members still face long periods of time with a substandard phone connection. One member in 2019 was waiting for nearly twelve months to have their phone fault rectified and several on-site visits by technicians could not identify the fault.

Situations such as this, cause great distress and disruption, to not only the accessibility the student has to their teacher in the home schoolroom, but also for the family conducting their business and jeopardising connection with the Royal Flying Doctor Service for children, staff and any other travellers passing through the area. This particular family was told on several occasions that no fault could be identified and at one point the fault was removed from the telecommunication server list.

After more than seven months of reporting the phone fault, the family was offered an interim phone service and two out of the three options required mobile coverage. (This family lives 400km from the nearest town). The third option was to have a satellite interim with the side note that when experiencing a long period of overcast weather, the interim service would only provide 15 min of calls per day. The interim service was offered on 2 May 2019 and the family accepted the offer on 3 May. Two weeks after accepting the interim service offer, the family was yet to receive the interim service and the phone fault remained unresolved.

4. The need for Telstra to ensure fault restoration and entitlements for geographically isolated students and their families occur within the CSG guidelines.

ICPA (Aust) seeks assurance that reporting is a true reflection of the experiences of customers, and that this reporting should be devoid of adjustment which aims to show a better outcome. Failed repair appointments are sometimes rescheduled (i.e. original appointment pushed out to another date) so that timeframes can be met. It is hoped that this information will also be captured in the reporting process.

The CSG guideline for repairs in remote service locations is three full working days after reporting. Feedback indicates that a number of members have recently experienced being without a fixed landline 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 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 outages occurring in aging exchanges is extremely concerning, especially when the supply of parts is the cause for the delay.

EXPOSURE DRAFT – SCHEDULE 1 AMENDMENTS

13A Preliminary provisions for the purposes of sections 13B to 13D

Definitions

ICPA (Aust) appreciates the extensive detail to definitions listed in this section. ICPA (Aust) would like to recommend that if the definition for “ESA” is not already in the main body of work, that a definition of ESA be included. While “**relevant ESA** means an ESA other than an ESA where all of the premises served by the ESA are within the fixed-line footprint of the national broadband network” is included in the definitions and refers to ESA, a true understanding is difficult if ESA is not defined as well. For the purpose of this submission, ICPA (Aust) has assumed that ESA is in reference to “Exchange Service Area”.

Another suggestion for consideration is the definition section on “contact” would be the inclusion of text message where it is possible for a customer to utilise this type of contact.

contact means:

- (a) a call by a person to a call centre; or
- (b) an online chat session initiated by a person to an online chat support system; or

(c) an email or a series of emails in a chain of correspondence between a person and the licensee (including where one or more of those emails are generated by a form on the licensee's website or other electronic system);

in relation to a reportable service (including before it is connected), in each case:

(d) where the call centre, chat system, or licensee's email address is operated by or on behalf of the licensee as a formal channel to provide support or sales assistance in relation to reportable services (however described); and

(e) whether or not the call centre, chat system or licensee's email address is used for any other purpose of the licensee.

While a dedicated text/SMS reporting number is not available at this time that we are aware of, having a fault reporting mechanism through SMS or text would be welcomed by some customers who can send messages via wifi/mobile service. This may be simpler than sending an email at the time they wish to make contact to avoid lengthy wait times. The dedicated RRADIO contact number and email address for reporting faults with HCRC systems has worked well for rural and remote families on these systems and perhaps a dedicated SMS or text number to report voice service faults would also work well as an alternative way of reporting for those with mobile coverage or the ability to text over wifi.

13B Public information on names of ESAs outside the fixed-line footprint of the national broadband network

ICPA (Aust) appreciates the steps taken in this section, in particular:

- (5) The licensee must take all reasonable steps to ensure that:
 - (a) members of the public may access the system at any time of the day or night; and
 - (b) the system provides an immediate, or near-immediate, response to a request for information.

13D Reporting to the ACMA and the Department on certain CSG services in ESAs outside the fixed-line footprint of the national broadband network

ICPA (Aust) welcomes the reporting tables and appreciate the clearly defined information to be reported to ACMA and the Department, in particular the fifth and sixth tables mentioned in sections 13D (10) and (11).

- (10) The fifth table must contain, for each request for the connection of a reportable service where the connection of the service was:
 - (a) completed during the month; or
 - (b) incomplete at the end of the month; or
 - (c) cancelled during the month;
- (11) The sixth table must contain, for each fault or service difficulty relating to a reportable service where the fault or service difficulty was:
 - (a) rectified during the month; or
 - (b) not rectified at the end of the month;
 - (c) closed by the licensee during the month (otherwise than because the fault or service difficulty was rectified);the following information:
 - (d) the unique service identifier of the service;
 - (e) the date of the day by which rectification of the fault or service difficulty
 - (i) is or was required under Division 3 of Part 2 of the CSG Standard; or

- (ii) would have been required, disregarding any relevant exemption that applies to the timeframe for rectification of the fault or service difficulty;
- (f) the cause of the fault;
- (g) either;
- (i) if paragraph (a) applies—the date on which the fault or service difficulty was rectified; or
- (ii) if paragraph (b) or (c) applies—a statement to that effect;
- (h) what relevant exemption (if any) applies to the timeframe for rectification of the fault or service difficulty;
- (i) if a relevant exemption applies because of an exemption event—the unique exemption event identifier for the event;
- (j) if paragraph (c) applies—the reason why the fault or service difficulty was closed.

ICPA (Aust) also welcomes both Public Reporting (13C) and reporting to the ACMA and the Department (13D).

It is clear there are ongoing concerns in the area of communications in rural and remote areas. ICPA (Aust) supports the continued focus on ensuring telecommunications providers are held accountable to guarantee consumers' interests are acknowledged and addressed. ICPA (Aust) appreciates the opportunity to provide input into this consultation.