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Digital Inclusion and Deployment Branch
Communications Infrastructure Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
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First Nations Community Wi-Fi Program – draft Grant Opportunity Guidelines

Thank you for the opportunity for OneWiFi & Infrastructure (OneWiFi) to make this submission in relation to The First Nations Community Wi-Fi Program-draft Grant Opportunity Guidelines. It is a privilege to have the opportunity to provide input into opportunities for closing the gap on digital inclusion, building on initiatives OneWiFi has made in recent years.

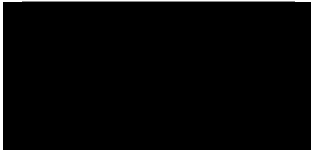
OneWiFi is Australia's leading Community WiFi and Mobile Active Neutral Host solutions provider and a licensed telecommunications carrier. We are an advocate for the most favourable outcomes for all consumers and communities, in line with OneWiFi's objective to make a difference in regional and remote Australia we recently implemented a Community WiFi service in Brewarrina, NSW to complement OneWiFi's neutral host mobile service, that seeks to bring competition and choice to regional and remote Australia.

We wish to make a number of observations and recommendations in regard to the Grant Guidelines:

- Why is site acquisition excluded in the eligible expenditure except where it is offered by the community? We believe it is essential to have access to land, infrastructure and power to deliver First Nation Community Wi-Fi, especially on a community-wide basis.
- Mains power provision and ongoing cost is not covered – we believe extension of mains power at a reasonable cost should be covered to deliver a reliable power source for at least the root backhaul locations. The Commonwealth may wish to consider putting a cost cap on mains power extension. The ongoing cost of metered mains power connection for 7 years is substantial and should be covered as an eligible expenditure.
- Users of community WiFi should be subject to fair use provisions so that the resources may be equitably distributed across the user community benefitting from a grant under the program.
- Where LEOsats provide the most viable means for delivering the backhaul component of the service, there are risks including volatility of data volume pricing. Therefore, a mechanism to counter that volatility should be included.
- Minimum performance specifications. The guidelines should define performance metrics

- for the solution. (refer 3.1), to ensure the service is fit for purpose.
- Successful grantees should be required to block certain content (as required by law) and also permitted to block certain services (eg bit torrent).
 - Can funding be applied to online safety measures?
 - Are High Altitude Platforms eligible for funding? (not covered in 6.1)
 - Can grant funding be applied to O&M and technology refresh costs in agreed projects beyond 7 years? (6.5.2). O&M costs are significant when delivering services that are fit for purpose.
 - In order to make the service cost effective to deploy in remote areas where power is not easily accessible, guidelines should require respondents to explore cost effective renewables sources of power.
 - Can grant funds be used to provide community located systems which enhance the service performance (eg caching)?

Yours faithfully,



ONEWIFI & INFRASTRUCTURE