Response to On Farm Connectivity Program Round 3 Discussion Paper

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Executive Summary

We appreciate the opportunity to provide feedback on the proposed changes for Round 3 of the On Farm Connectivity Program. While we support the program's objectives to improve connectivity for primary producers, we have significant concerns about the proposed removal of approved suppliers and the inclusion of potentially illegal equipment in the eligible equipment list.

Our key recommendations are:

1. **Maintain supplier approval processes** or require suppliers to hold appropriate telecommunications carrier licences

2. **Correct terminology** regarding signal boosters to comply with Australian law

3. **Address technical barriers** for geotagging requirements

4. **Ensure equipment quality** through appropriate verification mechanisms

Response to Specific Questions

Section 4.1 - Communicating with You

Question 1: How does the time taken between the announcement of a round and it opening for applications impact you?

The extended time between announcement and opening creates market uncertainty and can lead to customers delaying purchases. We recommend a shorter, more predictable timeframe of 4-6 weeks maximum.

Question 2: How far in advance would you like to be advised of the Program opening?

Four weeks advance notice would be optimal, allowing sufficient time for preparation without creating prolonged market disruption.

Question 3: What is your preferred method of contact to be notified about key dates and announcements?

Direct email communication to registered suppliers and stakeholders, supplemented by website updates and industry association notifications.

Section 4.2 - Primary Producer Rather Than Supplier Applications

Question 1: Are there any barriers to you completing an online application via the Hub's portal?

While online applications are generally accessible, many primary producers in remote areas may have limited internet connectivity or digital literacy, creating potential barriers to participation.

Question 2: Do you consider that removing approved equipment suppliers in Round 3 will increase the range of choice for primary producers, in making purchases of connectivity equipment?

We strongly oppose the removal of approved suppliers for the following critical reasons:

1. **Quality Assurance:** Without supplier approval processes, there is significant risk that primary producers may purchase equipment that does not meet Australian technical standards or is incompatible with local network conditions.

2. **Legal Compliance:** Many overseas suppliers sell equipment that may not comply with ACMA regulations or Australian standards and these are entering the domestic re-seller market. The removal of supplier approval increases the risk of illegal or non-compliant equipment entering the market.

3. **Technical Expertise:** Approved suppliers typically have demonstrated knowledge of connectivity solutions and can provide appropriate advice to primary producers. Unvetted suppliers may lack this expertise.

4. **Consumer Protection:** The current approval process provides a layer of consumer protection that would be lost under the proposed changes.

Alternative Recommendation: Instead of completely removing supplier approval, we recommend requiring suppliers to:

- Hold appropriate telecommunications carrier licences where applicable

- Demonstrate compliance with ACMA regulations / equipment compliance requirements

- Provide evidence of technical competency

- Maintain appropriate business registration and insurance

Question 3: For applications that are approved, what are the possible impacts on your business making full payment of purchased equipment up front prior to receiving a rebate?

This creates significant cash flow challenges, particularly for smaller primary producers. The requirement to pay in full upfront may exclude some eligible participants from the program.

Question 4: Do you agree the minimum purchase amount for the rebate of $2,000 and maximum threshold of $60,000 are appropriate?

The thresholds appear reasonable for the connectivity equipment being targeted.

Section 4.3 - Eligible Equipment

Question 1: Are there any connectivity solutions or equipment not in the attached proposed list of eligible equipment, that you think should be included?

We note several technical concerns with the current list:

1. **Terminology Error:** The list includes "Boosters and Repeaters" under Signal Enhancement Devices. **This is a critical error as mobile phone boosters are illegal in Australia under ACMA regulations.** The correct terminology should be "Gain Repeaters" or "Licensed Mobile Repeaters" to distinguish from illegal boosters.

2. **Clarification Needed:** The list should specify that only ACMA-licensed repeaters (such as Cel-Fi devices) are eligible, and that unlicensed boosters are prohibited.

Question 2: What do you see as the most significant barriers to connectivity on your farm?

The primary barriers include:

- Inadequate cellular coverage in remote areas

- High costs of professional-grade connectivity solutions

- Limited technical expertise in selecting appropriate equipment

- Terrain and distance challenges

Question 3: Would you expect you may require assistance from someone other than your local supplier to assess your current connectivity equipment needs?

Yes, many primary producers would benefit from independent technical assessment, particularly for complex installations covering large properties.

Question 4: Do you know who to talk to about your connectivity equipment needs?

This varies significantly. Many producers rely on local suppliers, but may not have access to specialists with deep connectivity expertise.

Section 4.4 - Packaging of Equipment

Question 1: What impact would the above approach have on primary producers' purchasing behaviour?

The prohibition on packaging may increase complexity and costs, as producers may need to source components from multiple suppliers but as long as all are eligible equipment this should be managable.

Question 2: Is there an instance where equipment sold as a package cannot be broken down into individual eligible components to support the application process?

Yes, many integrated connectivity solutions are designed as complete systems where individual components may not be separately priced or available, however these should all be eligible items but may include separate antennas for celfi repeaters etc.

Section 4.5 - Pricing

Question 1: What impact do you expect the proposed pricing arrangements may have for you?

Price caps based on market research may not reflect the true cost of professional-grade equipment suitable for agricultural environments. This could limit access to appropriate solutions.

Section 4.6 - Geotagging of Equipment Purchases Over $10,000

Question 1: Do you know how to supply geotagged photographic evidence?

This presents significant technical challenges:

From our experience in Round 2, many primary producers face difficulties with geotagging requirements:

- Limited smartphone capabilities in older devices

- Poor GPS accuracy in some remote locations

- Technical complexity for less tech-savvy users

- Connectivity issues preventing photo uploads

Question 2: Do you see any barriers to providing geotagged evidence of equipment over $10,000?

Yes, significant barriers exist as outlined above. These technical requirements may exclude otherwise eligible participants.

Question 3: Would you prefer having an option to submit a statutory declaration rather than a geotagged photo?

Yes, this would be a more accessible alternative that maintains program integrity while reducing technical barriers.

Section 4.7 - Installation and Delivery Costs

Question 1: What effect would the introduction of this proposed cap on installation cost have on your ability to purchase a connectivity solution?

A 15% cap may be insufficient for remote installations requiring significant travel, specialized equipment, or complex terrain considerations.

Question 2: If you believe delivery and installation costs should be more than 15% of the total purchase price of a connectivity solution, why?

For remote properties, installation costs can legitimately exceed 15% due to:

- Extended travel requirements for technicians

- Need for specialized installation equipment

- Complex site preparation requirements

- Safety considerations in remote locations

Additional Recommendations

1. Legal Compliance

The Department must urgently address the inclusion of "boosters" in the eligible equipment list. ACMA has consistently enforced that unlicensed mobile phone boosters are illegal in Australia, with penalties up to $412,500 or two years imprisonment. The terminology should be corrected to "Licensed Mobile Repeaters" or "Gain Repeaters" to ensure compliance.

2. Supplier Quality Assurance

We strongly recommend maintaining some form of supplier approval or licensing requirement to ensure:

- Equipment quality and standards compliance

- Technical competency of suppliers

- Consumer protection for primary producers

- Compliance with Australian telecommunications regulations

3. Technical Support

Consider establishing a technical advisory service to help primary producers assess their connectivity needs and select appropriate equipment, particularly given the complexity of connectivity solutions.

4. Alternative Verification Methods

Provide alternative verification methods for equipment installation that don't rely solely on geotagged photography, such as:

- Statutory declarations

- Third-party verification by installers

- Physical inspections for high-value installations

Conclusion

While we support the program's goals to improve farm connectivity, the proposed changes raise significant concerns about equipment quality, legal compliance, and accessibility. We urge the Department to:

1. **Maintain supplier quality assurance measures** through mandating licensed carriers only or retain the supplier approval processes

2. **Correct the illegal equipment terminology** to ensure legal compliance

3. **Address technical barriers** that may exclude eligible participants

4. **Ensure consumer protection** through appropriate verification mechanisms

We appreciate the opportunity to contribute to this important program and look forward to working with the Department to ensure Round 3 delivers quality connectivity solutions to Australian primary producers.

Contact Information

This submission is provided in response to the On Farm Connectivity Program Round 3 Discussion Paper (July 2025). We request that this submission be considered in full during the program development process.