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ALGA comments on the Consultation Paper: *Review of sunseting payphone instruments*

The Australian Local Government Association (ALGA) welcomes the opportunity to comment on the consultation paper released by the Department of Infrastructure, Transport, Regional Development and Communications - *Review of sunseting payphone instruments*.

The Australian Local Government Association is the voice of Local Government in Australia, representing 537 councils across the nation. In structure, ALGA is a federation of State and Territory Local Government Associations. Comments made in this submission should be read in conjunction with any separate comments received from State and Territory Associations as well as individual councils.

General Comments

There has been a long history of community concern over the installation and removal of payphones. In 2011 a motion was passed at the National General Assembly of Local Government to implement a national moratorium on the removal of payphones in local communities until telecommunications companies engage in meaningful consultation.

While no moratorium was implemented by the Minister at the time, Senator the Hon. Stephen Conroy, the Minister indicated that there was a process that Telstra must undergo before removing any payphones, and that the process included consultation with local communities. The needs of the community must be taken into consideration in making a decision on removing a payphone and the decision-making process needed to be transparent.

In the past, consultation processes regarding payphone installations and removals have received considerable criticism (refer Regional Telecommunications Independent Review Committee Report 2008) about the adequacy of consultation with regional communities.

Despite the increase in mobile phone coverage and the increased ownership of mobile phones, ALGA notes that payphones are still important to local communities. There are still members of the community who rely on payphones for social, safety or economic reasons. Additionally, there is still unreliable mobile phone coverage in many rural and remote areas, the continued existence of

disadvantaged members of the community who do not own their own phone, increasing numbers of homeless people and the need to make emergency calls (particularly when mobile phone towers have been affected by natural disasters, which are predicted to be more frequent and extreme) reinforcing the need for public payphones to remain under the Universal Service Obligation. COVID-19 has also highlighted the issue of social isolation and social poverty.

In August 2021, Telstra announced that it would make the 15,000 public payphones free for local and national calls (Telstra News, 3 August 2021).

The need for payphones during natural disasters when the mobile network is down and for vulnerable Australians, the homeless, the isolated and those escaping domestic violence, were key reasons why the Telstra CEO made the decision. The ongoing need for payphones was further reinforced by the statistic that in the previous year (2020), Australians made 11 million calls on payphones, including more than 230,000 calls to vital services like Triple Zero.

Local government welcomed the decision to make payphones free and the recognition of the vital importance of payphones to sections of the community. The decision was also welcomed by charitable organisations such as Red Cross and the Salvation Army.

The future of payphones and the role of sunseting instruments

The five Universal Service Obligation payphone instruments made by the Minister are now 10 years old.

ALGA will not comment on each of the five instruments individually, but provides general overarching comments.

ALGA would support a review of the instruments, acknowledging that there has been a steady reduction in the number of payphones across the country over those 10 years. ALGA would also support a more detailed review into, and further work on, the locations of payphones into the future to ensure they are aligned with need and their location objectively assessed through a transparent set of procedures. The impacts of projected increasing disasters and pandemics should be taken into consideration.

As highlighted in the consultation paper, the demand for payphones has changed over the years, and the instruments could be reviewed and streamlined. ALGA would, in principle, support streamlining of the requirements to take into account changing community expectations and new technologies. However, new rules/consolidated instruments should be transparent and equitable and be underpinned by strong standards for Telstra's operations.

Local Government would be pleased to assist in such a review, to ensure that community needs are taken into consideration.

Conclusion

Local government acknowledges the continuing importance of payphones to local communities, particularly those groups which have a clear social need. It also acknowledges the role of payphones

during natural disasters, and for those escaping domestic violence. Local government's involvement in the installation and removal of payphones has had a long history.

ALGA supports a review and streamlining of the five instruments governing payphones to bring them in line with current community needs and expectations. However, any new arrangements need to contain strong standards and benchmarks, transparent processes, equitable access and involve community consultation.

ALGA would be please to assist in such a review.

Please contact Monica Telesny, Senior Policy Adviser on 02 6122 9433 if you require further information on this issue.

Yours sincerely

A handwritten signature in black ink that reads "Matt Pinnegar". The signature is written in a cursive, slightly slanted style.

Matt Pinnegar

Chief Executive Officer