



Chris Steel MLA

Special Minister of State
Minister for Transport and City Services
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The Hon Alannah MacTiernan JP
Chair, 2024 Regional Telecommunications Independent Review Committee
Via email: RTIRC@infrastructure.gov.au

Dear Ms MacTiernan *Alannah*

Thank you for your correspondence to the Chief Minister dated 23 May 2024, inviting an ACT Government submission to the triennial statutory review of regional telecommunications. On behalf of the ACT Government, I welcome the opportunity to assist the Regional Telecommunications Independent Review Committee (Committee) by providing the ACT perspective.

In the Terms of Reference for the review, the Committee is seeking advice on a range of issues including impact of current investments to address identified needs, leveraging emerging technologies including uptake and attitudes of regional consumers, the needs of First Nations communities, modernising Universal Service Obligations (USO) and improving telecommunications resilience during natural disasters. In response, the ACT Government seeks to highlight the following:

Impact of current investments to address identified needs - Equitable access to telecommunications services for all Australians

The ACT Government recognises the importance of ensuring equitable access to reliable telecommunications services for all Australians. Currently more than 70 per cent of the National Broadband Network (NBN Co) residential footprint in the ACT is based on Fibre-To-The-Node (FTTN), which provides inconsistent highspeed broadband due to performance dependency on the distance between customer locations and the nearest node.

In October 2023, NBN Co stated that while its national target for rolling out Fibre-To-The-Premises (FTTP) to premises is 90 per cent, in the ACT the target is reduced to 50 per cent due various challenges including the condition and access to the aerial reticulation network.

As a result, many ACT premises will remain without the benefits of an FTTP connection and will rely on other technologies. Addressing the issues related to inequitable FTTP coverage across Australian jurisdictions is of primary importance to the ACT Government when it comes to improving regional telecommunications services.

Evaluating emerging technologies

The ACT Government has recently started evaluating emerging technologies, particularly focusing on the potential of Low Earth Orbit Satellite (LEOSat) and, to a lesser extent, Geostationary Orbit Satellite (GEOSat) technologies. Consideration should be given to extending policies like the USO to include data services across these satellite platforms, considering the implications and opportunities for regional communications policy settings and program design.

Public sentiment on changing and emerging technologies - 3G network closures and mobile coverage gaps

There continues to be challenges with gaps in mobile coverage across the ACT. At the Regional Connectivity Ministers Roundtable on 24 April 2024, concerns were raised about the 3G switch-off potentially leaving gaps in coverage. The Victorian Minister for Government Services recently wrote to the Commonwealth Minister for Communications, with support from other states and territories, urging the Commonwealth and industry to ensure the switch-off does not negatively impact regional connectivity or access to emergency services. The ACT Government would like to take this opportunity to re-state its support for this concern.

Furthermore, there is an urgent need to address mobile coverage gaps in telecommunications black spots across the ACT, which have been continuously identified in discussions since 2016. Canberra is a regional city, and some of the most populated areas in Canberra continue to experience black spots and inconsistent coverage, particularly in urban areas such as Aranda, Cook and Kingston. These areas require robust communications infrastructure to cater to a high population. In addition, areas like the Casuarina Sands Recreational Reserve, the Cotter Campground and the Cotter Reserve have experienced several drownings, highlighting the public safety importance of securing temporary or permanent mobile connectivity. Improving 4G and 5G coverage in these (and other) peri-urban fringe areas is crucial for both public and emergency services.

Addressing the needs of Aboriginal and Torres Strait Islander communities

The ACT has only one Aboriginal and Torres Strait Islander community that would be considered regional or remote. This community has a reasonable level of mobile coverage and is able to have what would be considered standard NBN Co services connected. As a result, the ACT does not have specific Territory-related input to support assessing the needs of remote Aboriginal and Torres Strait Islander communities or the extent to which those needs are being met through various government initiatives.

Investigations into technologies like Low Earth Orbit Satellite (LEOSat) and Geostationary Orbit Satellite (GEOSat) are ongoing, primarily benefitting the general populations and remote local sites rather than specifically addressing Aboriginal and Torres Strait Islander communities' needs.

Modernising USO and improving telecommunications resilience

While the USO for voice calls is not a significant concern in the ACT, the ACT Government advocates for the provision of additional fixed emergency phones in regional or tourist areas such as campgrounds, natural attractions and other remote areas with limited or no 4G/5G coverage

There is potential to expedite certain USO modernisation outcomes, particularly within NBN Co's fixed wireless network footprint, which could catalyse broader changes in telecommunications infrastructure.

The ACT Government recently submitted a proposal Round 2 to the Commonwealth's Peri-Urban Mobile Program, highlighting the areas within our peri-urban fringe where the bush/vegetation meets the edges of the suburbs, which create natural disaster risks for those living and working in those areas, and noting that these areas have traditionally been underserved because of their high cost, difficult terrain and lower population densities. Although no operators or infrastructure providers submitted grant applications based on our Round 2 proposal, subsequent discussions between ACT Government officials and industry representatives indicate there is awareness across industry of the need to address coverage in these areas.

Improving telecommunications resilience during natural disasters

Existing regional communications systems are inadequate during emergencies such as bushfires, as recent events have demonstrated. The ACT Government is exploring the feasibility of enhancing current infrastructure by integrating deployable Command and Control (C&C) LEOSat systems, similar to those implemented in other states, to improve reliability, resilience, speed, and coverage of regional communications during natural disasters.

Although Fadden, Mt Majura, and One Tree Hill received funding for improved resiliency under the Mobile Network Hardening Program Stage 2 funding, other sites in the ACT may need enhancement once the 3G network closure is completed and any deficiencies in 4G coverage are being addressed. 3G towers were traditionally located on overlooking hilltops with a larger coverage area per tower, while suburban coverage for 4G and 5G is predominantly from multiple towers inside the suburban space.

Targeted advice to the Committee

The Committee has requested advice of jurisdictions on specific issues identified in Section 4 of its Terms of Reference. The ACT Government provides the following targeted advice.

Advice to the Regional Telecommunications Independent Review Committee

1	Telecommunications needs in regional Australia, gaps in services, and barriers to addressing needs, gaps and improvements in telecommunications outcomes.	The ACT does not have access to FTTP service for 50% of its households. This is predominantly due to the higher cost to provide the FTTP services within the ACT due to an ageing aerial reticulation network and the need for expensive underground civil works needed for the FTTP rollout, rendering it commercial unsuitable for the NBN rollout program. The inequity issues must be addressed to ensure the NBN roll-out commitment cater for the additional costs.
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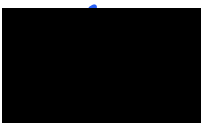
		The ACT does not have regional areas as other states and territories do and would not have influential input.
2	Changes or adjustments needed to existing Government policies and design and delivery of programs to ensure they continue to be effective; remain fit for purpose; are maximising the social and economic potential of regional Australia and of existing and emerging technologies; and deliver improved telecommunications outcomes	Potential extension of USO to cover emergency phone services and critical data services to support emergency operations.
3	Policy settings that might be needed to support more rapid rollout of, and investment in, new and emerging telecommunications technologies in regional, rural and remote Australia, or to address emerging issues	Consider integrating LEOSat and GEOSat providers to Federal Policies to ensure the services they provide meet minimum service levels to support regional applications.
4	Constraints and capacity of the telecommunications providers to deliver investment and improved services to meet the needs of regional Australia	The ACT does not have regional areas as other states and territories do and would not have influential input.
5	The need for targeted place-based solutions, which may differ by region and remoteness.	Enhance support for regional or remote tourist locations, such as camping grounds, to ensure adequate emergency services coverage is available.

The ACT Government remains committed to collaborating with the Commonwealth and other states and territories to advance regional and rural telecommunications. We believe that through joint efforts, we can enhance the resilience of our telecommunications infrastructure, fully leverage emerging technologies, and meet the unique needs of all communities, including those in remote and regional areas.

If the Committee would like to discuss any of the issues outlined in this submission further, the relevant contact officer is [REDACTED], Chief Digital Officer, Digital, Data and Technology Solutions at [REDACTED].

I trust the information in this letter assists the Committee's review. The ACT Government looks forward to ongoing engagement with the Commonwealth and other states and territories on opportunities to address regional and rural telecommunications and improve resilience.

Yours sincerely



Chris Steel MLA
Special Minister of State

22 August 2024