To:

2021 Regional Telecommunications Review Secretariat

Department of Infrastructure, Transport, Regional Development and Communications

GPO Box 594

CANBERRA ACT 2601

ADTIA is pleased to provide its submission to the **2021 Regional Telecommunications Review.**

ADTIA agrees to have this submission be made public and published. ADTIA also welcomes the opportunity to further discuss this submission by contacting Dominic Schipano at ███████████████ or ████████ for further consultation.

Regards

Dominic Schipano

NEO and Secretary

ADTIA

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Regional Telecommunications Review 2021

ADTIA Response to Issues Paper - July 2021

Introduction

This response to the Issues Paper is prepared by the National Office of the *Australian Digital & Telecommunications Association (ADTIA).* ADTIA is a registered Industry Association active in the Digital and Telecommunications sectors of the industry as per appendix 1) with Management Board representatives from a wide range of the telecommunications and IT industry. ADTIA is also a board member of the Council of Small Business Organisations Australia (COSBOA) and on many industry committees including Standards Australia, Communications Alliance.

ADTIA broadened its coverage to include the other sectors of the Telecommunications industry including infrastructure, in premises installations, Computer and Telephony integration FtA/Broadcasting, Digital and Subscription TV, Radio Communications, Mobile phones, Home integration systems and other associated sectors. This included workforce development, relevant industry skills and training programs, improved business productivity and growth, and quality assurance.

The ADTIA operates several specialist committees and these technical advisory committees include representatives from industry training providers, mainstream telecommunications, broadcasting and IT, including the main carriers – Telstra, Optus and NBNCo - equipment and cabling vendors, customer Cabler Registrars, electrical industry representatives (National Electrical Contractors Association), specialist customer equipment installers and designers the Custom Electronics Design and installation Association (CEDIA), International Copper Association of Australia (ICAA), an industry publication Connection Magazines, Broadcasting and a number of private consultancies.

The ADTIA also works closely with various Federal Government Departments including ACMA via its main advisory group Communications Advisory Group (CAG) with over 30 members and operating with ADTIA secretarial support. ADTIA also provides advice and support to CITT activities with Government programs and training resources development and supply for RTO's on a non-profit basis delivering Telecommunications and Telecommunications training

ADTIA focuses on many industry issues including:

- Quality, Standards and Customer digital experiences
- Workforce Training and Skills development
- Industry growth and productivity
- Industry based Professional development

The ADTIA specialist committees have provided input into this review and the feedback we receive from members, the registry and our committee structure, has formed the backbone of this submission.

Executive summary

What is needed?

- High-quality broadband
- A continued option to have a "landline service"
- improved mobile coverage
- Access to telecommunications retail outlets
- Access to properly trained registered installers
- An ability to report unsatisfactory installations and illegal cabling work
- Working remotely is difficult on many occasions with dropouts and slower speeds at peak times

What has changed?

- Increased demand for fast high-quality broadband
- Removal of Black spots in mobiles and wireless NBN areas
- Access to high-quality installers and telecommunications advice sources

Government policies

- Competition has its place. But competition will not deliver in the low profit areas and government needs to pressure telcos and other stakeholders to provide some services based on social needs.
- Some cooperative funding needs to continue with government business partnerships and community representatives, particularly when delivering in indigenous communities
- All levels of government should be coordinating their efforts to improve telecommunications and regional facilities. This could be undertaken by the Department in consultation with stakeholder representatives

Service reliability

- Service reliability is crucial particularly in times of emergency
- Slow transmission speeds and dropouts discourage people working remotely and areas of poor coverage need to be addressed
- Although the commercial impact is not measurable it is quite profound on small businesses and businesses relying on good communication with major centres such as architects and designers
- Network resilience is essential and there should be widespread promotion of the notion that telecommunications is an "essential service"

Impact of digital services

- Digital has had a major impact as with metropolitan areas

- During the COVID crisis the NBN has facilitated homeworking to a degree never envisaged, reduced the need to travel and slowed the community drift to the cities for work

Access and affordability

- A more cohesive approach is required by government at all levels, led by the Commonwealth
- Co-operation with consumer groups, community organisations and perhaps Communications Alliance (CA) co-opted on a special project to identify areas to be addressed
- There are a number of medium sized housing developments in many towns and cities in the regions and these need special attention to ensure infrastructure ("pit and pipes") is provided, anecdotal information suggest this is not happening in some new approved council estates. Also, smaller dwellings and enterprises need to be provided with the core infrastructure to connect to the network

Innovation and investment

- There is a need for continuing investment and support through grants programs for projects aimed at improving telecommunications and IT facilities
- Co-operative ventures with TAFE and universities need to be encouraged and could work through industry hubs and possibly skill councils
- State Governments should be encouraged to ensure adequate training funding is provided to Telecommunications training as an essential industry service

Advice on connectivity options and consumer rights

- Continued support for the regional tech hub concept is essential
- Experiences with the concept should be shared and developed to expand the opportunity for advice
- ACMA should work with the network providers and retailers to provide access points and portals. Current web-based advice by NBNCo-and the registered cablers website need to be supplemented with hand out leaflets at commercial retail outlets

New technologies

- Access to new technologies and facilities should be available to regional communities on the same basis as in metropolitan areas. In some cases cross subsidisation may be required

Compliance with technical standards

- There should be enforcement of mandatory technical standards and Cabler registration by ACMA
- ACMA "on-site" inspection and audits must be restored to maintain credibility of the Regulator and ensure compliance and safety are paramount in work undertaken by Cablers.. Capability is essential

- Customers should not be faced with poor installation services resulting in unreliability and poor performance of telecommunications and subsequent expensive rework
- The ACMA complaints process should be overhauled to facilitate public and industry reporting of dodgy customer service work
- The ACMA functional area that works on Customer Premises Cabling Regulatory issues should be expanded to again provide capability for engagement with Industry Committees and field audits
- **ACMA like other Regulators must introduce a professional development program for all Registered Cablers to ensure safety awareness for themselves and Customers with new requirements such as Power over Ethernet (PoE) in the revised AS/CA S009:2020 INSTALLATION REQUIREMENTS FOR CUSTOMER CABLING (WIRING RULES) that is a mandated standard for all Registered Cablers.**

List of questions in the issues paper. ADTIA responses

1. What telecommunications services are required in regional Australia to meet current and future needs? Are there any things regional communities and businesses need to do, but can't on their existing services?

Regional communities require access to fast broadband and a reliable communications connection whether this be by mobile or fixed line and a high level of reliability in a range of geographical and climatic circumstances

Fixed line services have been reduced in number but are still retained in many regional households and businesses. Many households retain a home phone as part of the bundling of services by carriers and these services are widely used for day-to-day contact across the regions.

There are many instances where mobiles are carried while driving or using what limited public transport there is for security and assistance in the case of a vehicle broken down or a kangaroo strike and contact with the household is maintained with a fixed line service. Regional residence are more likely to use a home phone than their metropolitan cousins for a range of reasons.

As a consequence of privatisation there is a tendency for carriers to only provide mobile services where it is profitable. This means that government has provided services in "Black Spots" funded by the taxpayer. There are also many locations where NBNCo-does not have access to cable and as a solution, Satellite and Wireless services are provided depending on the remoteness of the service. These services are generally adequate but as time goes on and data demands increase many of these services are less than satisfactory.

Technological upgrades will be necessary in the future and these costs should be primarily borne by the operators, not the consumers. However, it is accepted that there would need to be some increases in service costs unless offsets can be achieved by the carrier.

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In times of crisis such as bush fires and floods and now COVID 19 telecommunications network is a critical essential service for regional and remote communities and more resilience needs to be built in to the network particularly mobile towers and small country exchanges. Many First Nations people live in very remote environments and need special attention and consultation with representatives is essential.

2. What changes in demand, barriers or challenges need to be addressed when it comes to telecommunications services in regional, rural and remote Australia?

The demand for fast, reliable broadband is probably the most important issue of concern along with Mobile services with a minimum of "Black Spots". Mobiles are critical, especially for residents who often commute long distances in cars and other vehicles and need the security of a good network. A fixed line service is also more important in the regions to enable contact from a vehicle a considerable distance from home to be made for roadside assistance or an emergency.

3. How have the government's policies and programs affected telecommunications service outcomes in regional, rural and remote Australia? How can these be improved?

One of the difficulties that often arises is getting appropriately trained and qualified technical staff to carry out customer premises installations of telecommunications equipment and cabling and to provide setup services for modems and communications equipment in both domestic and business services.

Often sales offices sell products to consumers to boost wireless modems, for example, which are unsatisfactory and where advice should have been given in the first instance to upgrade cabling as there is no substitute for cabling in a premises, particularly where there are solid walls or multiple-storeys.

Small business in many instances is disadvantaged by not having more locally available technical staff to quickly remedy technical faults or poor service standards. There is still a legacy of Telstra/Telecom Australia providing end-to-end service where many customers do not understand the role relationships of the NBNCo and customer equipment and cable providers.

Often delays in service restoration or upgrades are delayed because the customer is not aware of the roles of carriers vis a vis cabling providers, particularly in situations where lead-in cable from the pit is an issue.

More support needed for vocational training (VET) in telecommunications and IT in the regions, particularly in TAFE where in many instances telecommunications training is no longer provided. This could be achieved by better utilising Group Training Companies to foster support from companies and small traders and better supporting the existing state and federal traineeship arrangements as the fragmented "jobs network" often fails to address issues in telecommunications and IT and is more interested in the fast throughput areas of retail, hospitality and other denser employment areas.

4. How do service reliability issues impact on regional communities and businesses? How do outages including in natural disasters, impact on communities and businesses?

Recent experience of fires, floods and cyclones in Australia has demonstrated the need for a robust, reliable telecommunications service. When telecommunications services fail, there are a number of emergency and safety challenges (well documented) but also social issues arising such as an inability to get cash from bank accounts, to purchase essential items such as food and fuel. This causes individual angst and needless losses to business, mainly small and family owned.

Telecommunications is an essential service but does not seem to be recognised universally as one. There have been many examples of telco staff being unable to get fuel as a priority for their standby generators, when the power grid has gone down and power to exchanges, repeaters and mobile towers is lost.

Often regional fire authorities and other essential services are able to go to the front of the queue for fuel and supplies while telco workers have to wait in line. Although this is not a telecommunications or IT issue directly addressed in the paper, it is of concern for regional areas and needs to be addressed politically. Telecommunications should be consistently referred to as an *essential service* or even a utility – a term well understood in the community.

5. How might such impacts be addressed to ensure greater reliability? How can the network resilience be addressed in regional areas?

More formally referring to telecommunications as an *essential service* and publicising this as widely as possible is necessary. The community generally and retailers in particular should be made more aware of the status of telecommunications as an emergency service. Better co-ordination between authorities is needed, although based on experience in the recent massive East Coast fires there have been a number of policy changes for the better.

When the military are brought in there needs to be a better liaison point in the community to deal with the commanders. In the last fire crisis there were a number of instances where helicopter lift was available, but not provided to telcos to lift their emergency generators to key assets such as mobile towers, which meant that the backup batteries went down over a relatively short time and the mobile tower, repeater or exchange service, was no longer available. Battery maintenance shortfalls and in some case under provisioning by Telcos has been experienced.

Regarding fire, better fire protection of sites should be investigated urgently as often there are relatively cheap improvements that can be made to protect vulnerable points; cable in risers for example.

Telcos should be encouraged to ensure they have sufficient standby emergency power plant, adequate battery back-up and wherever possible, more fire-resistant installations and also documented plans to cover most contingencies experienced in the past, in emergencies.

6. How did the use of digital services change for regional consumers and businesses during the response to the COVID 19 pandemic? What insights for future service delivery does this provide?

As has been well documented, overall, the NBN performed remarkably well and its capacity was extended during the COVID crisis to enable Australians who could do so, to work from home. However, in a number of cases the traditional telecommunications cabling in the household or business was not adequate for modern digital services. In many instances telcos provided wireless modems to households and businesses, particularly small businesses as a solution.

However, in many buildings, mainly domestic and small business, the signal levels were reduced between rooms or floors to such an extent that customers could only work in close proximity to the modems. Telecommunications experts are adamant that wireless solutions in a home or business environment have severe limitations and the only way to get good quality, consistent service is to have up-to-date cable such as Category 6 or higher.

With technical service and on site/in home support, as mentioned earlier, there is a shortfall of qualified technicians available in many regions and often local electricians carry out the work. Some are un-registered for telecommunications cabling and customer premises equipment work which can result in poor standards of work and no compliance form (a mandatory requirement under ACMA Regulations) left with the customer.

Many electricians are very capable and are registered under ACMA rules, but there is also a number who regard work in telecommunications as a secondary activity. ACMA Audits over many years show that there are up to 35% faulty installations that are not in accord with Australian New Zealand technical standards or the rules for cablers, cabling and equipment standards set by ACMA. Some are safety related. ACMA has been de-funded to a level where it no longer has the capacity to provide an inspector on site to carry out an audit or inspection for safety and network integrity. This needs to be remedied.

Future service delivery will depend on the NBNCo-being able to adequately provision the wholesale network, but unless steps are taken to improve the quality of installation and servicing work in customer's premises, the NBNco effort will be futile. Marketing is presently focused on short-term solutions such as the provisioning of improved modems or boosters, but there should be an education program for the retail outlets to encourage improved cabling in the premises which is the only viable long-term solution. Comms Alliance and consumer protection bodies are well-equipped to run such programs if they get adequate government support.

7. What can be done to improve the access and affordability of telecommunications services in regional, rural and remote indigenous communities?

A special project should be allocated to a body such as Communications Alliance or even an experienced consultancy such as ADTIA, to convene the carriers, retailers and other relevant stakeholders in telecommunications to examine ways to improve delivery and better co-

ordinate the planning and delivery of services. Competition has its place, but it can be detrimental in the regional, rural and remote indigenous communities.

A more cohesive approach which involves local First Australian groups would deliver better services and in the long run even improve the bottom line for all of those in the supply of services. On many occasions the most basic of services such as public phone boxes are neglected. Mobile phone network provision plus reasonable access to handsets is a priority and support should be given to some of these more vulnerable communities on how to finance a mobile service, as there is evidence of unscrupulous sales and marketing practices being applied to many indigenous communities. Clearly, an economical and reliable broadband service is a critical element for education, medical, social and employment opportunities for indigenous communities to prosper.

8. How can investment in telecommunications infrastructure work with other programs and policies to encourage economic development in regional Australia.

Telecommunications infrastructure is critical to the economic development of towns and cities, the farming community, mining, manufacturing, particularly the small family-owned operations and it is a challenge to meet those diverse needs. A viable option to develop strategies and policies to better deliver infrastructure may be to establish localised or state/territory committees to encourage economic development in each State reporting to the Minister on an annual basis on progress and steps taken to co-ordinate infrastructure development with other programs such as road, rail and IT services.

In cities and larger towns near metropolitan services, new housing developments usually have good planning involving local government as well as utilities, however, a number of new developments in some regional towns have been undertaken without emphasis on the telecommunications infrastructure required. In the past Telstra provided basic cabling infrastructure, often termed pit and pipe to enable provisioning of services to the estate. The transfer of the carrier role to the NBN is not well understood in many municipalities and some developments have gone ahead without pit and pipe infrastructure or with inadequate provision. This is a burden on the NBNCo as they are a provider of last resort and retrofitting cable is too expensive, so wireless solutions for example are provided that deliver a less than optimum service.

If telecommunications was better promoted as an essential service, to a large extent these problems of poor provisioning would be overcome as telecommunications would be treated as a priority, the same as water gas and electricity.

9. What role could innovation, including new models, alternative investors or new ways of doing business, play to encourage investment in regional telecommunications infrastructure? What are the barriers?

Innovation is as important to regional communities as it is to those in metropolitan areas. However, many of the government incentives for innovation are Metro oriented and funding is more likely to be allocated to known enterprises in Metro than they are to smaller regional

enterprise. Commonwealth and State agencies responsible for innovation could work together better to deliver more reliable funding streams rather than the stop/start arrangements that seem to be quite common. It is appreciated that taxpayer funded programs should be implemented with care.

But there are a number of regional, mainly family-owned businesses who could be encouraged to work with universities and TAFE centres on innovative projects. There are many examples today of successful innovative solutions in irrigation, field soil preparation, packaging of produce and in automated distribution networks. Telecommunications and IT need more emphasis in this context and there has to be leadership from Commonwealth and State/Territory governments to overcome the lag in community knowledge of the transfer of functions from Telstra/Telecom Australia to the NBN co-. In the past Telstra/Telecom Australia, often using the resources of its Research Labs at Monash and worked with community organisations to deliver innovative solutions, which were rarely recognised in a more formal sense by government, but were very fit for purpose.

The barrier really is a lack of understanding of the technical/engineering contribution of telecommunications and IT in many sectors of government and the business community and a shortfall of bureaucratic willingness to examine options in telecommunications, digital and associated ICT sectors.

10. To what extent will new technologies enable significant change to the delivery of telecommunications services in regional Australia over the next 5 to 10 years? Are there any barriers to accessing these technologies?

The primary technology to be developed further and installed more universally is the NBN for broadband supplemented by satellite applications in many specific instances. The NBN is the platform upon which faster delivery of the growing data needs is built. Satellite technology can provide niche services. There are also many "Black Spots" for the mobile network and some shadows for the NBN wireless service we have poor service is delivered and these areas need extra investment. These could be filled by negotiated agreements with all the carriers and not just left to government to backfill blackspots or individual carriers to be the supplier of last resort.

The delivery of fast broadband and some cloud based data services in a reliable manner is critical to the development of the regions. An additional benefit is a social one with easing of the growing population burden on metro areas. There is an over emphasis on the part of marketers in the carriers retail network and the vendors on 5G. 5G is an important service, but fast reliable broadband at reasonable cost and universally available is the most critical service to be provided. 5G can be introduced over time as technology, industry and customers demand fast broadband, which may be the case, say, in mining or other areas where there is widespread automation and fast broadband is critical.

11. How can government better support the rapid rollout of an investment in new telecommunications solutions in regional areas?

Government agencies in the Commonwealth and States and Territories can work to better co-ordinate rollouts of investment. The Communications Alliance with an expanded role can be a body, if properly funded on a project basis, to assist with various implementation programs. However, there is some evidence that there is a lack of expertise on basic telecommunications delivery in many of the Commonwealth agencies and to a lesser extent in the states and territories.

At present there is an overemphasis on projected benefits of 5G and marketing hype on IoT that appears out of proportion to reality. That is not to say that 5G and an understanding of IOT are not important. They are. But should not be overemphasised at the expense of the core functions of the telecommunications network to provide fast, reliable services at a reasonable cost to individuals, business and the community at large.

Government by itself cannot be successful without working in unison with the many stakeholders in the telecommunications industry. There are a range of levers such as taxation concessions and specialised grants that can be applied in strategic areas with rewards based on milestones. Obviously, a better trained workforce can be a great facilitator and there are a range of issues in the VET system that need to be addressed to better supply skilled labour to telecommunications. The training functions that were with PMG/Telecom Australia/Telstra have never been picked up by the private sector due to a range of factors including competition for labour where companies have still not faced the need for a collective, industry approach to training and that poaching of skilled staff is a short-term measure only.

12. How can different levels of government, the telecommunications industry and regional communities better co-ordinate their efforts to improve telecommunications in regional Australia

This question overlaps the content of a number of others, but in principle the solution requires a will to make progress by co-operation, not just competition. Co-Investment with the private sector has been successful in some targeted areas. State and territory-based committees made up of representatives of the telecommunications industry could be established to provide on ground input to the Minister with progress reporting on an annual basis. Transparency would help on telecommunications infrastructure and services generally, as in many cases the good telecommunications service we have had in Australia, in comparisons with other countries since 1901, is just taken for granted and not enough effort put in at a community level. Telecommunications is an important utility and should be treated as such and its integral links with IOT also recognised in planning activities.

Telecommunications is a complex industry and as with any network, requires a will to co-ordinate and not just compete.

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13. What changes to government investment programs are required to ensure they continue to be effective in delivering improved Telecommunications?

On the surface, there appear to be low levels of government investment now due to privatisation, other than what is devoted to the blackspot and related programs in the mobile network sector. In the absence of a willingness of the telcos and NBNco-to provide services in these commercially unviable areas, government needs to continue direct subsidy and grants for targeted projects and co-investment, as has been undertaken to date and continue co-investment the private sector and states and territory agencies.

Many local governments have also developed some expertise in telecommunications and can be worthwhile partners in many of these ventures with some even establishing their own local networks to meet business needs.

14. How can regional consumers be better supported to identify, choose and use the best connectivity options for their circumstances, as well as to understand and use their consumer rights?

As referenced in the discussion paper, levels of digital ability in regional Australia lag behind most metropolitan areas, although this divide is narrowing as a consequence of a lot of recent work being put into digital education, particularly in the schools, TAFE and the university sector as well as a general lifting of awareness in the community as Internet services available become more ubiquitous.

The Regional Tech Hub concept helps regional and rural Australians get connected and stay connected and is operated by the National Farmers Federation in partnership with ACCAN. This has been effective in building on the work of the regional consumer advocacy group for rural, regional and remote Australia, the BIRRR. However, its existence is not as well-known as it should be and there needs to be greater effort to promote this important facility in regional newspapers and media

Often, support for regional communities requires direct, "down-to-earth" support and advice and ready access is a key and in some cases re-direction to the greatly improved information on websites of the NBNCo and the Registered Cablers website (managed by a consortium of Registrars and the copper association) will suffice.

The Australian Communications and Media Authority (ACMA) and Industry Organisations in the past attended many "show" events relating to homebuilding, renovations and other home industry events with leaflets and advisors in booths, which helped to spread useful information on customer options and how to exercise their consumer rights through the various agencies available.

This was an important service to advise tradespeople, suppliers and architects with information and this had a ripple effect through the community. Local newspapers and newsletters from localities where these events were held often prepared articles to inform local residents and small business on their options. The larger commercial sector usually has access to better

information from retailers than domestic and small business and this is where the primary need is quite apparent.

In recent times the ACMA - due to continued funding cuts - has rarely attended even the metropolitan home shows where it had traditionally been represented. Information leaflets that were previously widely available to a range of stakeholders are now also no longer available. Enquiries to the ACMA are now directed through a Call Centre where staff, no matter how well-meaning, are not familiar with the intricacies of regional/remote telecommunications and handle questions and answers in a manner that often have no real link to real-world experiences.

Apart from the ACMA, TIO and Comms Alliance, almost all other sources of information are commercially driven and unlikely to give objective responses to consumers. Rather, they tend to exercise their commercial judgement to seek commercial advantage.

As referenced earlier in this submission, the Communications Alliance (CA) is an organisation that could be allocated funding for particular projects and again may be a body to form a committee to advise government on the issues raised in the question.

The Telecommunications Industry Ombudsman (TIO) does a good job, but it needs to be supplemented with the government agency responsible for Communications and media i.e. ACMA before problems show themselves in the community.

15. To what extent is public information on connectivity options, including predictive coverage data and speeds sufficient to help regional customers make informed decisions? What other information is needed?

The answers in question 14 to a large extent, overlap with the response in 15. There is a shortage of relevant public information on connectivity options, coverage data and speeds availability and this is partly due to a mindset where telecommunications is not widely understood in the bureaucracy and in some cases seen to be a boring subject, relative to some of the more headline grabbing issues including of course the COVID 19 epidemic presently and sometimes more high profile local events that are easier to cover by journalists.

This can result in an information gap on telecommunications and also IT with the term IOT being an acronym not well understood. Also, in the community there is a widespread level of apathy on telecommunications as it has been so reliable for so long under the previous monopoly where end to end service was a responsibility of Telstra/Telecom Australia. There was less complexity than there is today with multiple carriers, varying consumer offerings and changed responsibilities particularly with the demarcation of responsibility between network and customer premises.

Competitive factors mean that there is a diversion of advice from the retail service providers and the network of consumer outlets. Again, a government agency like ACMA could take on this task of better informing the public on the issues raised in this question and in turn would lead to a more informed public and with consumers bearing lower costs than they do at present

due to duplication, and in some cases rework to correct faulty installations; rework that is often not measured.

16. What other matters should the committee consider in its review and why are they important?

A "sleeper" issue is the role of ACMA in regulating telecommunications customer equipment and cabling under the remit of the Telecommunications Act and Regulations. Compliance to technical standards and ensuring that the workforce is properly trained and legally registered, is crucial to delivering a reliable telecommunications service at reasonable cost,

This issue of non-compliance is directly linked to the review as:-

- Service reliability is crucial and currently compromised in many instances
- Hundreds of thousands of homes rely on health/security alarm services delivered via the network to base centres and these are extremely common in the regional areas where medical services are not always readily available
- There are already higher telecommunications costs carried by regional consumers for a range of reasons, some relating to distances and remoteness
- Extra costs associated with poor initial installations and often essential remedial work can be avoided by applying the intention of the act and regulations with an active regulator, ACMA
- Without an ability to undertake audits and on-site inspections, there has been a rise in the level of non-compliance to technical standards and registration requirements to as high as 35% in some centres. No other essential service/utility would accept this level of non-compliance to standards and registration requirements which in some cases involve Portland safety elements
- Experiences with fire, flood and then COVID 19, have shown that there is a high level of resilience in the network (NBN) despite some of the challenges. The weak link now in delivering high-speed reliable data and voice is in the customer premises installation
- Even though there is widespread concern in regional areas with the quality of their in premises services, there is a limited ability to report this (TIO will often refer to ACMA) or have any action taken by ACMA to properly record the report, properly investigate or carry out an on-site inspection to either advise of inadvertent breaches or take some form of penalty based action

Even the capacity to report incidents of various regulatory breaches to ACMA is compromised. Unlike other essential services where a complaint can be made by a member of the public, a consumer or another service supplier, the ACMA has a convoluted complaint system (in essence virtually limited to a de facto statutory declaration) that deters complaints and results in very few being recorded and almost nil being investigated.

Compliance monitoring in some other areas of ACMA responsibility, relating to mobiles and vendors, for instance, is also well short of global best practice and although this is a matter for other reviews, is another indicator of a regulator with "no teeth".

Arising from the recent Australian experiences of fire, flood and then COVID 19 there is now widespread recognition that telecommunications is in fact an "essential service". All other utilities - essential services, gas, electricity and water - have monitoring and audit services and on-site inspection capability. ACMA should be funded to do the same!

Compliance monitoring in some other areas of ACMA responsibility, relating to mobiles and vendors, for instance, is also well short of global best practice and although this is a matter for other reviews, is another indicator of a regulator with "no teeth".

In the commercial sphere there are also many issues relating to safety and service reliability that are not being addressed due to the inability of ACMA to fund an effective regulatory environment. In essence, there is a need to address non-compliance to technical standards in the regional areas with particular attention being given to the special problems in aboriginal and remote communities.

For further information please contact Dominic Schipano on ▮▮▮▮▮▮▮▮ or email
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National Executive Officer and Secretary
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ADTIA Network

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- Industry Networks
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