

Ref: DocID 734255

20 September 2021

The Hon Luke Hartsuyker  
Chair  
2021 Regional Telecommunications Review Secretariat  
Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 594  
CANBERRA ACT 2601

Dear Mr Hartsuyker

Thank you for the opportunity to provide feedback to yourself and the members of the Regional Telecommunications Independent Review Committee. As a community located in regional New South Wales, access to effective and reliable communications technology and infrastructure is a critical concern for community members and their elected representatives of Bland Shire Council area. Having appraised the issues paper distributed as part of the 2021 Review, Bland Shire wishes to submit the following information in responses for the consideration of your committee. Please note, not all questions posed in the issues paper have received a response – only those with direct relevance to Bland Shire Council.

#### **Questions 1 & 2**

- 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?**
- 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 required services in regional Australia to meeting current and future needs will be contingent upon access to reliable and suitable services. With the impending phase out of fixed options with copper wire and mobile options such as 3G, those within Bland Shire Local Government Area dependent upon these technologies will have no capacity to connect. While parts of Bland Shire currently have wireless access from 4G and 5G (the latter which is only in West Wyalong township), the coverage in less populous areas is non-existent from either of these options, let alone 3G.

There are currently 38 identified black spots within Bland Shire with 7 considered as remote. It is noted that one of seven remote black spots has received funding during Round 4 of the Mobile Black Spot Program. However, several areas within the south western and western areas of the Shire have no mobile coverage and, without further expansion of the 4G and 5G network, within a few years these communities will be without access to wireless telecommunications services and subsequently in a communications black hole.

It should be noted that issues in relation to the phasing out of copper wire connections has been raised by a previous review (Sinclair Report, 2011) which spoke of maintaining standard telephone services with the Federal Government's response at the time being "The Telecommunications Universal Service Management Agency (TUSMA) will monitor ongoing delivery of the standard telephone service by Telstra as part of its overall management of the TUSMA agreement." With the NBN rollout now complete, regional, rural and remote consumers have limited (and in some areas no) options for how they will communicate in the future and without access to networks, many areas will be further isolated, particularly with the ending of 3G in June 2024. The question could well be asked, with TUSMA no longer in existence, how is the ongoing delivery of standard telephone services being monitored?

The provision of telecommunications services is, in general, a commercial decision by third party enterprises leveraging off Government infrastructure. While NBN Co's key objective was to ensure all Australians had access to fast broadband at affordable prices, as a wholesaler, it is not in a position to ensure third party enterprises whose service delivery is market driven will adopt a community service approach and guarantee access in regional, rural and remote areas of Australia.

Despite the Government's acknowledgement that NBN Co<sup>1</sup> will not generate a commercial return in these areas, more transparency in relation to the administration and compliance with the Regional Broadband Scheme requirements from third party enterprises is essential. This would provide a level of comfort to those within regional, rural and remote areas that their ability to access telecommunications services was being provided in accordance with the stated objective that NBN Co should "support appropriate levels of investment in the network to meet the current and future needs of Australians, wherever they live".

#### **Question 4**

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

The Glasston Review in 2008 raised the issue of improving telecommunications services for emergency service organisations with the Government of the day agreeing with further comment being "The Government will refer this recommendation to the Australian Emergency Management Committee in its capacity as the peak forum for managing national strategic emergency management issues and policies. This will enable engagement with state, territory and local governments on options for addressing these issues in regional areas".

Since that time it is clear that there is much work still to be undertaken to ensure communications in emergency and disaster situations can be maintained. This was evidenced during a submission to the *Royal Commission into National Natural Disaster Arrangements*<sup>2</sup> identifying a failure in communications technology's impact on connectivity

---

<sup>1</sup> NBN Co, Statement of Expectations, 26 August 2021

<sup>2</sup> Submission by BAI Communications 17 April 2020

stating the 2019-20 bushfire season demonstrated shortcomings in Australia's existing emergency services and public communications networks.

Reliability of communication infrastructure is highly relevant to Bland Shire Council which has experienced four significant flooding events within the past 10 years, the most recent being March 2021. The LGA has also previously experienced wide front bushfire incidents and access to reliable communications during such emergency events has been critical. As the geographically central point of the Bland-Temora Fire District as well as home to the southernmost SES Headquarters of the Lachlan SES Southern region, capacity to communicate with outlying units during emergency situations has been assisted through external grant funding to provide improved mobile and internet capacity through the independent installation of satellite technology at Ungarie.

However, this is just one community within the LGA and many others, which have been included on various black spot lists, are yet to have connection issues addresses. It is not uncommon for mobile and internet services to be slowed or drop out completely for varying periods of time not only within the smaller communities of Bland Shire but the major townships as well. As a result, the impacts these outages have on established and emergent commercial operations are measurable, let alone frustrating.

#### **Question 7 & 8**

- 7. What can be done to improve the access and affordability of telecommunications services in regional, rural and remote Indigenous communities?**
- 8. How can investment in telecommunications infrastructure work with other programs and policies to encourage economic development in regional Australia?**

It is noted that the Government committed \$83M to the Regional Connectivity Program (RCP) designed to target investment in infrastructure based on local priorities. However, this program is predicated upon elements which do not specifically support a community-based objective, despite being required to target social value. While the first round of this program saw projects valued in the vicinity of \$117M approved, the criteria for eligible grant applicants places greater focus on licenced telecommunications carriers or those who hold or intend to hold a Nominated Carrier Declaration (NCD) under the *Telecommunications Act 1997*. Few of these organisations are based in regional, rural or remote areas and, as such, decisions around infrastructure location would again be drawn from a commercial perspective as opposed to a community service obligation position despite a requirement for consultation with the host communities.

Although a number of local government authorities were successful in their applications to the Regional Connectivity Program, these projects represent just \$6.5M of the overall programmed projects value. Future rounds of the program should continue to require applicants who are telecommunications carriers or NCD holders to give priority to communication requirements identified with local government authorities.

To facilitate greater uptake of the Regional Connectivity Program and, therefore, an increased investment in telecommunications infrastructure in regional, rural and remote areas, greater emphasis should be placed on increasing awareness of any future grants made under this program. Given that all projects are expected to source co-contributions and support, with the most overt form of support being a financial one, greater awareness of the program will allow for Councils to future plan their financial involvement as either a lead applicant or as part of a project consortia.

## Questions 10 & 11

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

**11. How can Government better support the rapid rollout of and investment in new telecommunications solutions in regional areas/**

Rather than harnessing new technologies, many in regional, rural and remote areas of Australia would be comfortable with being able to access to existing technologies. As previously stated, there are areas within Bland Shire Council's footprint which have limited or no access to basic mobile or internet services. A commitment from the Federal Government to work through NBN Co with licenced telecommunications carriers to ensure provision of such access is essential. This situation is approaching criticality with the previously mentioned phase out of fixed options with copper wire and mobile 3G options in locations which do not have access to 4G and 5G technologies. It would be Bland Shire Council's submission that those redundant technologies should be retained until an appropriate and affordable level of service coverage and access is available from the newer technologies.

Another measure which would facilitate improved access to telecommunications would be the requirement of future development areas to install Fibre to the Curb (FttC) technology. While this is currently available through service providers for an additional fee, ensuring the existence of FttC provision by NBN Co at construction stage will increase not only connectivity outcomes but improve the reliability and speed of internet access for consumers. The resultant outcome would create an ongoing benefit for those living and working in regional locations as well as a flow on economic benefit for the communities in which they are located.

Similarly, guaranteed mobile coverage on all major road transport corridors is an ongoing concern in regional areas. Despite published carrier maps indicating such coverage exists, anecdotal evidence from those who frequently travel on these roadways provides an opposing view. A review of service provider maps<sup>3</sup> would indicate the three main telecommunications providers (Optus, Vodafone, Telstra) have varying levels of coverage along the Newell Highway, one of the main transport corridors within NSW and one which traverses Bland Shire Council's region. In a large number of locations along this corridor, that access is delivered by 3G technology which poses an issue for future access should those areas not be suitably serviced by a 3G replacement option.

Another significant transport corridor within the Bland Shire Council area is the Mid-Western Highway – a thoroughfare that traverses from Bathurst in the East to Hay in the West. This highway has minimal mobile coverage with significant stretches of roadway completely lacking in access. The impact of this is stretched across several local government areas other than Bland Shire and in emergency situations, such as heavy or motor vehicle collisions, can delay emergency service providers from attending. A case in point was a recent single vehicle car accident in a neighbouring community to the west of Bland Shire which required the driver to run approximately one kilometre into a township to raise the alarm<sup>4</sup>. Sadly, an 11-year-old passenger in the vehicle died as a result of injuries suffered

---

<sup>3</sup> nPerf 2014-2021 – Cellular Data Maps

<sup>4</sup> The Area News, 6 September 2021, Rankins Springs 'shaken' after 11-year-old dies in Mid Western Highway crash, driver charged.

before emergency services were able to arrive at the scene. A tragic outcome which may have been averted had the driver been in a position to access reliable network coverage.

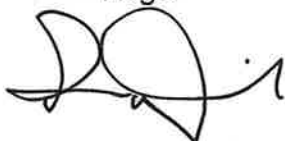
Within regional areas, connectivity is very much driven by your choice of provider despite NBN Co's service availability map portraying national coverage this is conditional upon some premises requiring "additional work to be completed first" or "on rare occasions, some premises cannot be connected". This last stipulation is contrary to the stated objectives of NBN Co and could indicate that it would not be in a position to "reliably and affordably meet the current and future broadband needs of households and businesses, including in regional and remote Australia" particularly as access to those broadband services is reliant upon a commercially driven third party provider.

An alternative would be a service sharing requirement in regional areas provided by the dominant telecommunications providers, particularly for mobile telephone access, to overcome existing and future blackspot issues. This suggestion was previously made during the 2008 review with the Government of the day indicating agreement and its intention "to consult state, territory and local governments through the Online and Communications Council on options for addressing these issues". What became of those consultations – or if they actually took place – is unknown. Suffice to say, sharing of network access does not appear to be in practice in regional areas.

For NBN Co to be able to "foster productivity and innovation, and support our goal for Australia to be a leading digital economy and society by 2030"<sup>5</sup> these issues must be suitably addressed by the Federal Government through its Government Business Enterprise<sup>6</sup>. With a priority being placed on network rollouts in underserved areas more emphasis needs to be placed on overcoming the challenges of service delivery to regional, rural and remoted areas – specifically for Bland Shire but also many other similarly positioned local government areas.

Once again, thank you for this opportunity to provide a perspective from a regional community which has experienced challenges with regards to telecommunications in the past.

Kind Regards

A handwritten signature in black ink, appearing to read 'Ray Smith', with a stylized flourish at the end.

Ray Smith, PSM  
**General Manager**

---

<sup>5</sup> NBN Co Limited Statement of Expectations - 26 August 2021.

<sup>6</sup> Australian Government response to the 2018 Regional Telecommunications Independent Committee report: 2018 Regional Telecommunications Review: Getting it right out there.