



March 2021

Mr Garth Donovan
Director, USG Reliability Department of Infrastructure, Transport, Regional
Development and Communications
GPO Box 594
CANBERRA ACT 2601
Via email: USG@communications.gov.au

Dear Mr Donovan,

Re: Consultation on reasonable connection and supply requests for statutory infrastructure providers

The Regional, Rural and Remote Communications Coalition (RRRCC) is an alliance of 21 organisations and advocacy bodies formed to advocate for better connectivity in regional Australia. The RRRCC understands that while the consultation process has closed, it is important for the department to understand the regional, rural and remote communities concerns with the measures presented in this paper.

The RRRCC supports the Australian Communications Consumer Action Network (ACCAN) submission into this process. We want to take this opportunity to specifically highlight a concern that if unchanged, will severely impact regional, rural, and remote Australians.

The RRRCC supports the current definition of residential premises as appropriate and easy to understand, yet part (b) should be removed. The requirement for the premise to be situated at a location with a street address or physical mailing address discriminates against an enormous amount of regional, rural and remote households. Not all homes have one physical mailing address, with 300,000 rural and regional homes only using a Post Office (PO) Box address to access their mail and parcels¹.

The NBN rollout has shown multiple ways to identify a premise, such as instances where latitudinal and longitudinal coordinates have been used to locate and connect a home. Given that this has already been an issue with NBN in the rollout in remote areas, the department should learn from the complications experienced by the rollout of NBN. The requirement for a street address should be removed from the Determination in order to prevent situations where a consumer may be left unconnected.

¹ Australia Post, Home isn't your customers' only delivery address brochure.
<https://www.innerwest.nsw.gov.au/ArticleDocuments/1582/Australia%20Post%20Brochure%20-%20Home%20isn't%20your%20customers'%20only%20delivery%20address.pdf.aspx>

Additionally, the RRRCC support the other recommendations from the ACCAN submission:

- The removal of the requirement for premises to be situated at a location with a street address or a physical mailing address, as not all homes have one. If this is not adjusted, it could lead to some premises being refused connection.
- A provider should not be able to refuse a connection where civil works are required and have not been supplied. It is the responsibility of the network provider to arrange the necessary civil works, and therefore this should not be a reason to refuse the connection.
- There is a need to include greater flexibility around the timeframe for which access must be provided in order to connect premises to prevent situations where a consumer is refused connection due to failing to meet a timeframe.
- The list of premises that are eligible for connection should be reviewed periodically to ensure that it remains comprehensive and fit for purpose.
- There should be no requirement for the end-user to attest that they have or expect to occupy or use premises for a minimum duration. Similarly, there should be no minimum duration to consider a home as ‘continuously located’ and therefore eligible for connection.

Yours Sincerely,

The Regional, Rural and Remote Communications Coalition

