



18 May 2024

Department of Infrastructure, Transport, Regional Development,  
Communications, Sport and the Arts

By email: [sip@infrastructure.gov.au](mailto:sip@infrastructure.gov.au)

***Re: Statutory Infrastructure Provider (SIP): Regulated Broadband Speeds***

Internet Australia, a national Chapter of the Internet Society, appreciates the opportunity to comment on the Department's consultation on increasing the legislated Statutory Infrastructure Provider (SIP) peak download speeds of at least 25 Mbps to 100 Mbps.

ISOC-AU is a non-profit society founded in 1996, which promotes the Internet development in Australia for the whole community. ISOC-AU is a chapter of the worldwide Internet Society and is a peak body organisation, representing the interests of Internet users in Australia.

ISOC-AU's fundamental belief is that the Internet is for everyone. We provide a broad-based representation of the Australian Internet community, both nationally and internationally, from a user perspective and a sound technical base. We have a longstanding and ongoing commitment to effectively representing these interests in self-regulatory processes in the telecommunications, domain name, and Internet-related services industries. We also consistently promote the availability of access to the Internet for all Australians.

We strongly support the recommendation to increase the legislated SIP peak download speeds of 25 Mbps to 100 Mbps and provide the following comments on the implementation of such recommendation, as discussed below.

Holly Raiche  
Chair, Policy Committee  
Internet Australia



The Consultation Paper asks the questions of Stakeholder submissions:

1. Do you support an increase to SIP speed requirements?
2. What benefits would this deliver to consumers?
3. Should there also be an increase to the current legislated peak upload speeds from 5 Mbps?
4. Are there any other changes that you think the department should consider to support better consumer outcomes?

### **Requirement for increased legislated speeds for SIP and Benefits to consumers**

Internet Australia has argued for some time over the need for increasing the speed requirements on SIP

High speed and high-quality broadband services are essential, particularly for people and businesses in regional and remote areas. Their remoteness and long distances required to be travelled physically means increasingly more importance is placed on interacting virtually – whether for education or health consultations, keeping in contact with family and friends, shopping and logistics planning ordering goods and services to be delivered. Farmers and other primary producers make extensive uses of real-time satellite observations and weather forecasts, as well as accessing markets to buy and sell produce. The ability to stave off loneliness in remote areas by making frequent high-quality contact with loved-ones elsewhere can reduce the pressures of loneliness that leads to relatively high incidences of mental health concerns in regional and remote areas.

Internet Australia has always recognised and supported measures and programs to improve availability and quality of communications services in regional and remote areas, and the Internet Society and its chapters around the world are actively engaged in connecting remote communities and indigenous communities across the globe.

### **Increased Upload Speeds**

Internet Australia's support for increased legislated speeds includes argument for an increase in upload speeds as well. Increasingly, a range of services are delivered online, including medical diagnoses, education and participation in a range of online communications and activities that require increased capacity for meaningful participation.

Specifically, Internet Australia has consistently argued for:

- High quality and bandwidth;
- As symmetrical in upstream and downstream capacity as possible;
- Accessible to all Australians, wherever they reside or work;
- Meets communications needs of people with disabilities;
- Affordable; and
- Provided in a competitive environment.

### **Additional Comments**

- **Co-ordination of broadband policies**

The 2021 Regional Telecommunications Review commented on what it called the ‘Patchwork Quilt’ of connectivity policies between the Federal, state and territory governments that resulted significant differences in the cost and quality of broadband services in Australia.<sup>1</sup> Indeed, the 2024 Review called for a technology neutral universal service review that would merge the SIP regime with the USO regime to provide for a technology neutral universal service regime to ensure all Australians have access to broadband services, at minimum standards, however delivered, throughout Australia.<sup>2</sup>

Internet Australia supports this call for a more coordinated universal service regime that involves all levels of government, and covers the delivery of minimum base levels of service to all Australians throughout Australia.

- **Customer Protections**

Existing consumer protections are not part of the SIP regime under Part 19 of the Telecommunications Act 1997. If there is to be a technology neutral universal service regime, then customer service requirements that used to be part of the USO must be part of a broader regime that includes not only universal connectivity, but requirements to ensure all Australians have access to affordable, accessible telecommunications service, through an enforceable consumer code(s).<sup>3</sup>

ENDS

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<sup>1</sup> 2021 *Reginal Telecommunications Review: A Step Change in Demand*, p. 19

<sup>2</sup> 2024 *Regional Telecommunications Review: Connecting Communities Reaching Every Region*, Recommendation 3, p 44.

<sup>3</sup> Ibid. Recommendation 4, p 79.