Submission for the Consultation on Increasing Minimum Legislated Broadband Speeds

About Us

Yarramalong Communications Action Group

The Yarramalong Communications Action Group is a group of local Yarramalong, Wyong Creek, Dooralong, Jilliby, Ravensdale and Cedar Brush Creek residents who are actively seeking to improve our communities' access to communications (focusing on our future Internet connectivity options). We are strictly a non-commercial collective of like-minded residents that wishes to improve our Yarramalong / Wyong Creek / Dooralong / Jilliby / Ravensdale /Cedar Brush Creek area's access to high-speed internet.

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

Consultation: Increasing Minimum Legislated Broadband Speeds under the Statutory Infrastructure Provider (SIP) Regime
Submitted by: Yarramalong Communications Action Group (YCAG)
Date: 30 May 2025

To Whom It May Concern,

The Yarramalong Communications Action Group (YCAG) welcomes the consultation on increasing minimum broadband speeds to 100 Mbps under the Statutory Infrastructure Provider (SIP) regime, as outlined in the April 2025 consultation paper. Representing Yarramalong, a rural community in NSW's Central Coast, we advocate for reliable broadband to support education, business, and bushfire safety, building on our 2021 Regional Telecommunications Review submission (No. 415). We support higher speeds but urge including latency and jitter standards to ensure equitable, high-quality connectivity.

The Need for Comprehensive Broadband Standards in Rural Areas

While increasing minimum peak speeds is critical, broadband quality in rural communities like Yarramalong depends on more than just bandwidth. Our 2021 RTR submission highlighted persistent challenges with unreliable internet and mobile services, which hinder remote work, online education, and access to emergency services. For instance, inconsistent connectivity disrupts virtual classrooms and telehealth appointments, while poor service reliability affects small businesses reliant on cloud-based tools. These issues persist in 2025, underscoring the need for performance metrics that address the full spectrum of broadband quality.

Latency (the time data takes to travel from source and destination) and jitter (variations in latency) are particularly critical for real-time applications. For example:

- Education and Work: Video conferencing platforms (e.g., Zoom, Microsoft Teams) and Voice over IP (VoIP) require low latency (<150 ms) and jitter (<30 ms) to ensure clear communication. In Yarramalong, high latency often disrupts online learning and remote work, exacerbating the digital divide.
- Small Businesses: A 25 Mbps connection can support a small office's needs (e.g., email, file sharing), but excessive latency (>200 ms) or jitter renders these tasks inefficient, impacting productivity.
- Emerging Technologies and Safety: Telehealth, IoT devices, and emergency communication systems (vital in bushfire-prone areas like Yarramalong) rely on stable, low-latency connections to function effectively.

Our community's experience reflects a broader need for broadband standards that prioritise reliability and performance consistency, particularly in regional and rural areas where infrastructure gaps remain.

Recommendations for the SIP Regime
Building on our 2021 RTR submission, YCAG recommends the following to enhance the SIP regime:

- Incorporate Latency and Jitter Standards: Establish minimum thresholds for latency (e.g., <150 ms for consumer services, <100 ms for business-grade services) and jitter (e.g., <30 ms) during peak usage periods to ensure consistent performance.
- Develop a Holistic Quality Framework: Include speed, latency, jitter, and packet loss in a comprehensive performance standard, with providers required to report metrics transparently. This aligns with our 2021 call for equitable, reliable connectivity.
- Prioritise Rural Needs: Tailor standards to address rural challenges, such as those in Yarramalong, where latency and reliability issues often outweigh speed limitations. Engage regional communities to set benchmarks that reflect diverse use cases.
- Regular Updates: Implement a mechanism to review and update SIP standards every 2–3 years, ensuring metrics evolve with technological advancements and community needs, as emphasised in our prior advocacy.

Benefits of a Broader Approach

By integrating latency and jitter into the SIP regime, the Department can:

- Enhance Regional Equity: Address connectivity gaps in rural areas like Yarramalong, supporting education, telehealth, and economic opportunities.
- Improve Safety: Ensure reliable communication for emergency services, critical in bushfire-prone regions.
- Support Innovation: Enable adoption of latency-sensitive technologies, fostering digital inclusion.
- Increase Accountability: Motivate providers to optimise networks holistically, improving service reliability.

Conclusion

YCAG commends the Department for reviewing minimum broadband speeds to keep pace with technological change. Drawing on our 2021 RTR submission, we urge the inclusion of latency and jitter as core metrics in the SIP regime to deliver reliable, high-quality broadband to rural communities like Yarramalong. This approach will bridge the digital divide, enhance safety, and support economic and social outcomes. We are available for further consultation and thank you for considering our submission.

Yours sincerely,
Michael Kelland, on behalf of
Yarramalong Communications Action Group