

Alternative Voice Services Trials Department of Communications and the Arts GPO Box 2154 Canberra ACT 2601

By email: <u>usg@communications.gov.au</u>

6 February 2020

To Whom It May Concern

SUBMISSION RE: DESIGN OF ALTERNATIVE VOICE SERVICE TRIALS

As the local government representative of some of the remotest residents and business operators in Australia, Burke Shire Council ("**Council**") commends the Department of Communications and the Arts ("**the Department**") on its commitment to develop trials of alternative ways to deliver voice telephone services in rural and remote parts of the country currently serviced by high capacity radio concentrator ("**HCRC**") networks. Reliable, cost-effective telecommunication is of critical importance to rural and remote Australians, and, without resorting to hyperbole, access to such a service can literally be a matter of life or death during medical emergencies and natural disasters.

In regard to the *Design of Alternative Voice Service Trials - request for comments and expressions of interest*, Council offers the following comments:

1. System reliability

Any alternative to HCRC will be required to be a standalone system if it is to be successful, that is, not reliant on an external power source. Council believes that a power source similar to a solar battery bank would be suitable, as a system reliant on the traditional provision of power in rural and remote areas will be prone to regular failure, especially during North West Queensland's wet season.

2. Data capacity

Any alternative to HCRC must have the mandatory capacity to carry data, as is currently offered by a small-cell mobile network.

3. Call quality

The voice quality in any viable alternative to HCRC must be equal to, or better than, what is currently offered. To ensure call quality, the trials should include a diverse demographic, including youth, young children, the elderly, male, female, and participants of varied hearing capacity.

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4. Cost effectiveness

Over the longer term, whatever replaces HCRC must remain cost effective and accessible to all socioeconomic groups, in addition to catering for service expansion.

5. Broad stakeholder participation required

To test the effectiveness of any HCRC alternatives in real-world conditions, it is critical that the trials include a range of stakeholders, including domestic and commercial usage, health providers, schools, and emergency services.

6. Climate

The trials need to be undertaken in areas that offer climate extremes – including the prevalence of consecutive, cloudy days, high rainfall, and temperature variances – to ensure any alternative to HCRC is a robust system that is not detrimentally impacted by the climactic effects of different rural and remote geographic areas.

7. System redundancy

The trials should encompass all non-NBN and Wi-Fi systems currently available to the market. In addition, there should be restoration times incorporated into trial conditions to ensure the validity of data derived from the trials. If the trial system fails and participants are forced to revert to their existing system, the quality of the trial will be significantly impacted if service cannot be restored in a timely manner.

8. Suitability for remote education

Any alternative to HCRC needs to provide an accessible, reliable and quality service that does not impact the ability of distance education families to engage with teachers and students. The trials need to identify whether the trial system diminishes the quality of lesson experience, and whether it has the capacity to meet the evolving long-term needs of distance education users.

9. Ease of access to trials information

At the conclusion of the trials, information pertaining to the effectiveness of each carriage service provider ("**CSP**") offering must be made readily available to the public in a timely manner. Further, the trials should be viewed as a stepping stone to additional trials as telecommunication technology evolves, rather than the final step in identifying a HCRC alternative. By adopting this approach, the Department will ensure that the current and future needs of rural and remote telecommunication users are met in a manner consistent with the universal service guarantee obligations of telecommunication companies.

In regard to the scope of the trials, Council considers that there is benefit to undertaking a small-scale trial in the first instance to iron out any glitches and clarify its parameters before committing to the full-scale trials identified in the trials documentation. The provision of effective telecommunication in rural and remote areas is a difficult task in the most ideal circumstances, let alone those involving broad-ranging trials to gauge the suitability of alternative long-term service delivery options.

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Council is urging the Department to consider the Burke Shire and neighbouring Carpentaria Shire for inclusion in the trials, as these areas meet the population and geographical requirements specified in the trials documentation. The outcome of the trails will have a significant impact on the residents and ratepayers of both local government areas, and Council is committed to working with the Department and the relevant CSP to ensure that any trials undertaken in the Burke Shire provide accurate, relevant input to the delivery of post-HCRC voice telephone services. To that end, Council requests that a representative of Gulf Savannah Development, the peak economic development body for the Gulf Country region, be included on any stakeholder reference group established as part of the trials.

We confirm that Council agrees to have this submission published, and look forward to working further with the Department and other stakeholders to ensure that the trial fully considers the current and future telecommunication needs of those living in remote parts of North West Queensland

Yours sincerely

and

Ćouncillor Érnie Camp Mayor

Lyndon Keane Acting Chief Executive Officer

Reference: EC1060220

Cc: Ms Clare Keenan, Chief Executive Officer, Burke Shire Council Mayor Jack Bawden, Carpentaria Shire Council Mr Mark Crawley, Chief Executive Officer, Carpentaria Shire Council Mr Greg Hoffman PSM, Executive Director, North West Queensland Regional Organisation of Councils

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