



07 February 2020

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

To whom it may concern,

RE: Design of Alternative Voice Service Trials

The New South Wales Farmers' Association ('the Association') welcomes the opportunity to comment on the design of alternative voice service trials.

The Association is Australia's largest State Farming Organisation, representing the interests of over 6,000 farmers in New South Wales (NSW). Access to reliable, affordable, quality telecommunications underpins the viability of farming businesses across NSW. It enables farming families to access business and education services, and promotes social connectivity.

The Association supports the objective of the alternative voice trials to investigate improved delivery of voice services in rural and remote areas generally, and in particular in areas served by high capacity radio concentrator systems. We support increased choice in the availability of providers and services, and the associated encouragement of competition, especially in rural areas.

The Association makes the following comments on the proposed program design for alternative voice service trials in response to the questions posed. We support the proposal that the alternative services to be tested in the trials will be provided to consumers free of charge, and highlight the importance of maintaining consumers' pre-existing service as a safety net.

Question 1: Should the department be seeking to achieve other objectives through the trials? If so, how would this affect the design?

It is essential that fixed line services be maintained to enable two voice service options in rural, regional and remote areas. This will provide a back-up option where one service fails. This is of high importance due to the geographical isolation of rural, regional and remote residents, and the potential for affected people to become socially isolated.

This is of particular concern during times of emergency. For example, our members have reported incidents of NBN service failure due to blackouts. Where voice services are reliant on NBN, they will cut out. It is critical that rural Australians are not solely reliant on one service and retain access to fixed lines, HCRC or similar. Whilst these services may also experience issues in times of emergency, some capacity is usually maintained.

Question 2: In terms of the deliverables for customers, do you have any concerns about the proposed design of the trials or suggestions to improve it, for example, locations for the trials, how best to recruit consumers to take part, requirements on CSPs (Carriage Service Providers), and service requirements?

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The Association encourages the setting of clear expectations and measurable attributes to ascertain the effectiveness of the alternative services. For example, reliability of the services, frequency and length/severity of issues and outages, climatic impact on service, and general customer satisfaction with the service should be measured in addition to information gathered by the service provider. Together, the information provided by both the consumer and the provider should paint a complete picture of the performance of the service.

As a minimum, the alternative service provided should be of the same quality and reliability as the pre-existing service, and available at a comparable cost (when the trial is complete, noting that for the duration of the trial it will be free).

Recruitment of consumers should be voluntary and the option to leave the trial must be available. Whilst measures will be in place such as safeguarding consumers' pre-existing service and access to technical support, consumers may not want to risk their current level of service and should not be required to do so.

We support broad geographical diversity for the trial to adequately test alternative services in a variety of situations and climatic conditions across Australia.

It may be beneficial to target areas that have experienced poor service and ongoing issues as they may experience the most benefit, but a broad spectrum of consumers should be tested.

Question 3: *In terms of the needs of CSPs, do you have any concerns about the proposed design of the trials or suggestions to improve it, for example, information required, capping of customer numbers, timeframes, level of funding available, and the approach to payment?*

An increase in funding could lead to more lasting and beneficial outcomes from the trial. We support the twelve month timeframe as a minimum to experience variable climatic conditions and test the quality and reliability of alternative services over time. We also support engaging multiple communications service providers and participation of approximately 1000 customers.

If the trial could be lengthened and further participants involved, more information could be gathered to inform future decision making and gain a better understanding of the performance of the services and providers over time. The Association seeks clarity on how the two million dollars will be spent as this seems limited to gain meaningful data, and restricts what can be offered as potential incentives to participating consumers.

Question 4: *Do you have suggestions on what should happen at the end of the trials, noting that Government funding will cease?*

At the conclusion of the trial, depending upon what the results reveal, continued funding and support for an extension of the program should be considered.

If the trials are successful and of value to consumers, consideration should be given to any price impact and transition costs in continuing and expanding these services. This needs to be clearly communicated to consumers prior to completion of the trials when they decide whether they continue with the trial service or revert to their pre-existing service.

Pre-existing services should continue to be available and consumers must retain the option to revert to them.

Question 5: *Do you have any comments on the stakeholder reference group? What stakeholders should be represented on the groups? Would you like to nominate anyone as a possible member?*

Stakeholders from rural, regional and remote areas across Australia should be represented on the stakeholder reference group. In particular, farmers should be well-represented as these services are critical in farming communities. It will also be crucial to include older users and those with current limited services

Question 6: *Do you have any comments regarding the criteria for assessing proposals and contracting CSPs?*

In assessing proposals and contracting CSPs, it is crucial to ensure that the proposals and data put forward can in fact be adequately supported by the CSP. The consumer cannot be left with a lesser service.

It is also critical to ensure that support is available to trial consumers if they experience issues during the alternative voice service trial. The inclusion of access to a Department of Communications helpdesk or contact number is critical, at a minimum in the early stages of the trial.

It is important to keep CSPs accountable and ensure that consumers do not experience disadvantage through deterioration of reliability and/or quality of service as a result of volunteering for this trial.

Question 7: *Do you think regular surveys of trial customers would be useful? Do you consider there are any particular matters that should be monitored and evaluated during the trials in addition to those identified (e.g. service outages, quality issues and customer turnover)?*

The Association is supportive of regular contact with trial customers to understand their lived experience throughout the trial. If this is undertaken too infrequently, the consumer may not recall all relevant information, e.g. quality issues, outages, etc. It is important to gain feedback from consumers on their experiences in this regard, as data recorded by the CSP may not adequately capture these issues. Contact with consumers or the completion of one survey per month may be appropriate, with an option to report more regularly if desired. We suggest feedback is obtained through personal contact with consumers and any survey instrument.

Matters including reliability of the services, frequency and length/severity of issues and outages, climatic impact on issues and outages, comparison to pre-existing service and general customer satisfaction should be monitored and evaluated.

Question 8: *How would the trials be best promoted to rural and remote customers by both the department and CSPs? How would the results of the trials be best communicated once they are complete?*

The trials could be promoted by sharing evidence highlighting the benefits available through trialling the alternative service, including potential improvements in quality, reliability and cost. This must include data of actual improvement that could be experienced by consumers. Additionally, the promotion of protections including maintaining the consumers' pre-existing service and option to opt out of the trial could be promoted.

Upon completion, results must be communicated by sharing data to show the effectiveness of the alternative voice services in comparison to pre-existing services. Transparency and accountability is of paramount importance.

The proposed alternative voice service trials should deliver improved voice services to rural, regional and remote Australians. Services should be equitable to those available in urban areas, and should be of high quality and reliability. Alternative voice services must not reduce access to, reliability or quality of services. Upon completion of the trials, if alternative services are successful, service costs should be less than currently offered, and must not increase for pre-existing or alternative voice services. Ultimately there should be price parity with metropolitan areas.

The Association is supportive of the trials and their contribution to achieving long term solutions with no impact on existing USG and USO arrangements and commitments.

It is critical that the commitments of USG and USO are upheld and residents of rural, regional and remote Australia have access to affordable, reliable, quality telecommunications.

The Association appreciates the opportunity to comment on the Design of Alternative Voice Services Trials.

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Yours sincerely

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