



2 June 2020

Director
USG Implementation
Department of Infrastructure, Transport,
Regional Developments and Communications
GPO Box 2154
CANBERRA ACT 2601

To whom it may concern,

RE: NSW Farmers' Comment on draft Alternative Voice Service Trial Guidelines

The NSW Farmers' Association welcomes the opportunity to comment on the draft alternative voice service trial guidelines.

NSW Farmers is Australia's largest State Farming Organisation, representing the interests of over 6,000 farmers. Access to reliable, affordable, quality telecommunications underpins the viability of farming businesses across NSW. It enables productivity improvements, provides farming families with access to business and education services, and promotes social connectivity.

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 is supported, as is the intent to increase choice of providers and services. Increased competition is vitally important to improve access and quality provision.

NSW Farmers provided comment on the initial proposal and welcome the amendments that have been included in the Trial guidelines following stakeholder feedback.

With regard to the draft Alternate Voice Service Trial Guidelines we make the following comments.

1. It is essential that the technologies tested in the trial have the ability to deliver ongoing benefits to rural, regional and remote consumers. In selecting these technologies, consideration should be given to their potential for sustainability and longevity, particularly in terms of cost and affordability for consumers beyond completion of the free trial.
2. We note that cost to consumers, while briefly mentioned as a consideration of overall value, must be a key consideration. If the technology is not affordable without public subsidies (as provided under this trial), or at a similar price point to current technologies, it will be of little benefit in the long-term. After the trial, the technology needs to be affordable to the customer, profitable to the provider, repeatable across the country and serviceable to maintain connectivity.
3. There is extensive potential for business growth and productivity gains in rural, regional and remote areas. Many farmers and businesses in these areas are currently constrained by poor telecommunications capacity. It is important that these trials support improved services with a focus on increased productivity, rather than providing a minimum service.

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4. A mix of technologies and services must be tested, rather than multiple CSPs testing the same technology.
5. Given that the intent of the trial is to test potential sustainable alternate service provisions, we consider that the criteria should be weighted in favour of the product and service to be delivered. Criterion 1 relating to proposed approach and expected outcomes should be weighted at 50%, while Criterion 2 and 3 should be weighted at 25% each. If the technologies are unlikely to deliver sustainable, affordable benefits after the trial period, NSW Farmers questions if there is any longer term benefit from the trial.
6. Evaluation of the trials should be based on quantitative and qualitative data from both the successful service provider and the customer. It must also take into consideration any preference for ongoing use of the alternate voice service by the trial end-users.
7. It will be important that the outcome of the trials is publicly communicated and that options to expand the availability of alternate technologies from diverse retail Service Providers is understood by the broader community to enable well informed consumer choice.
8. An essential outcome of successful alternate services should be that service costs are lower than current offerings and that quality and reliability of connectivity is increased. Ultimately there should be price parity with metropolitan areas.

It is critical that commitments to ongoing service guarantees and Retail Service Provider obligations continue to be upheld to ensure that residents of rural, regional and remote Australia have equitable access to affordable, reliable and high quality telecommunications.

NSW Farmers appreciates the opportunity to comment on the draft Alternative Voice Services Trial Guidelines.

Yours sincerely

Garry Grant
Chair, Rural Affairs Committee