



9 June 2020

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

Via email: [usg@communications.gov.au](mailto:usg@communications.gov.au)

To whom it may concern,

**Re. Consultation on draft Alternative Voice Services Trials Guidelines**

The Regional, Rural and Remote Communications Coalition (RRRCC) welcomes the opportunity to provide a submission to the Department of Infrastructure, Transport, Regional Development and Communications' (the department) consultation on the draft Alternative Voice Services Trials Guidelines.

The RRRCC is an alliance of 21 volunteer and advocacy organisations with a shared interest in improving telecommunications in the bush. The Coalition was formed in 2016 to raise awareness of the vital role of connectivity for regional, rural and remote Australians and to advocate for continued improvements. The RRRCC's advocacy efforts are focused on five high-level goals, under which we have articulated a number of specific asks. The RRRCC's five goals are:

1. Guaranteed access to voice and data services.
2. Equitable voice and data services that meet minimum standards and reliability.
3. Continued program to expand mobile coverage.
4. Digital capacity building for regional, rural and remote Australia.
5. Affordable communications services for regional, rural and remote Australia.

Under goal 2, the RRRCC asks that any alternative technologies for voice service delivery be proven to have greater reliability and performance quality for regional, rural and remote customers. The Government's commitment to fund trials for the delivery of alternative voice services directly addresses this ask, as well as the 2018 Regional Telecommunications Review recommendation that the telecommunications industry be asked to bring forward new and innovative solutions for providing voice services in rural and remote Australia, particularly in areas served by the high capacity radio concentrator (HCRC) network.

Earlier this year, the RRRCC provided comment on the design of the alternative voice service trials. In this submission<sup>1</sup>, we commended the Government's commitment to fund trials for the delivery of alternative voice services and provided comment on various areas of the program design. The submission canvassed competition, customer service, monitoring and evaluation arrangements, trial timeframe, affordability, the inclusion of data as well as voice capability, use of existing infrastructure, provision of back-up services, and use of new and emerging technology. The submission also canvassed concerns about delivering on the program objectives, and reaching the target of least 1,000 customers, with the relatively limited funding available.

Following consideration of the draft guidelines and further discussions with the department, the RRRCC provides the following comments in relation to specific elements of the guidelines and program design and implementation.

### **Test a diversity of technological solutions**

Testing a diverse range of alternative voice service solutions is essential to realise the full potential of the trials. The draft guidelines address the importance of competition by ensuring grants are provided to a number of CSP applicants, yet, there is nothing in the guidelines that will ensure a variety of solutions will be trialled. The concern is that various carriers may apply for a grant to trial the same, or a very similar solution. The RRRCC's view is that consideration should be given to ensuring a range of innovative solutions are tested by the successful applicants.

### **HCRC areas as a priority**

The RRRCC understands the benefits of trialling alternative voice services over copper and HCRC networks but would encourage the department to ensure the program prioritises applicants focused on servicing customers in HCRC areas. The program was announced in response to particular concerns about the performance and longevity of HCRC networks, and the guidelines should reflect this priority.

### **Transparency between all parties**

It is critical that the trial process is transparent between applicants, participants, and the department. The RRRCC suggest the department ensure trial participants are made fully aware of the program details before any formal commitment to the trials. Participants must be well informed of any possibility that their service quality may be impacted and that there is no guarantee that the services provided through these trials will improve a participant's quality of service.

### **Call diversion arrangements**

The RRRCC considers that applicants must provide evidence of arrangements that would quickly divert incoming calls back to the consumer's primary voice service if there is a fault with the trialled service. This should be covered under Criterion 1. (g), which asks what customer support the applicant intends to provide, and should specifically include the ability of a provider to pause, stop or reverse the

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<sup>1</sup> February 2020 RRRCC submission on design of alternative voice service trials available at [nff.org.au](http://nff.org.au).

service. If an applicant is unable to provide instant transferrals to a working service, it becomes an issue of safety, not just convenience.

### **Excess usage charges**

The draft guidelines outline that applicants are to deliver alternative services to participants at no cost to the customer, subject to fair and reasonable use by the customer. Under this design, applicants would have the ability to charge for use in excess of pre-defined usage allowances. It is essential that these usage allowances are reasonable and known to a trial participant well before they have committed. The RRRCC suggest it would be more appropriate for restrictions to be placed on trial services, not the trial participants. Additionally, usage allowances must be considered in the application assessment, ensuring they do not impact normal usage patterns of a participant and therefore affect the results of the trials. It is just as important to test the alternative services' capacity to handle spikes in usage.

### **Reporting and data collection**

The success of this program will be determined by a final evaluation process using information from the grant applications, as well as monthly and final reports and other information to determine if the individual grants achieved the proposed program outcomes. The quality of the evaluation will be determined by the quality of the reporting from applicants - as well as the department's own monitoring arrangements - and it's essential that robust monitoring arrangements are in place, using established technical performance benchmarks.

Criterion 1. (h) requires applicants to describe how they intend to monitor the trials, including processes for sharing customer and service information. The RRRCC's strong view is that successful applicants must have mechanisms in place for effective collection of quantitative information on service performance as well as feedback on customer experience, and for regularly reporting this information back to the department and the broader public.

### **Trial timeframe**

In the RRRCC's February 2020 submission on the program design, we expressed concern regarding the suggested timeframe of 12 months for the trials. Service issues are likely to become apparent after the technology has been in place for some time, and in the scheme of a long-term technology, less than 12 months would not provide accurate results. To ensure that the alternative voice services are robust and to gauge their viability as long-term alternatives, the RRRCC suggest the services be trialled for 12 months once installed at the consumer's premises. This would allow the performance of all trial services to be measured for a consistent period of time, across all seasons and weather conditions.

Given the time constraints under the proposed program arrangements, an applicant's readiness to commence the project should be a high priority considered in both merit criterion 2 and the overall value for money analysis.

**Stakeholder reference group**

The RRRCC strongly support the formation of a stakeholder reference group to provide advice on any consumer issues that arise during the course of the trials.

Thank you again for the opportunity to provide a submission to this important process. Should you require any further information please contact Adrienne Ryan, General Manager Rural Affairs at the National Farmers' Federation.

Yours sincerely,

**The Regional, Rural and Remote Communications Coalition**

