



9th September 2019

Department Communications and the Arts
Commonwealth Government
Delivered via email to:

regionalconnectivity@communications.gov.au.

Dear Officer,

Re: Regional Connectivity Program—Discussion Paper

Enzen Australia Pty Ltd, along with our invested company National Narrow Band Company (NNNCo), is pleased to submit our input in to the above discussion paper. We congratulate the Commonwealth Government in taking the initiative to use a ‘place-based’ approach to target investment to provide economic opportunities and enable full participation in the digital economy for regional communities and businesses.

Our responses to the questions are as follows:

Question 1

Are there additional key elements that should be incorporated into the design of the Regional Connectivity Program?

The Regional Connectivity Discussion Paper states:

“the objective of the Regional Connectivity Program is to use a ‘place-based’ approach to target investment to provide economic opportunities and enable full participation in the digital economy for regional communities and businesses. This approach will focus on the priorities of a particular location, taking account of bespoke solutions rather than a ‘one-size-fits-all’ approach”.

It then goes on to list the intended outcomes of the program which are to:

- Provide place-based solutions to regional digital connectivity issues through a range of mobile and/or broadband services.
- Complement the National Broadband Network, the Mobile Black Spot Program and the telecommunications industry’s commercial investment plans.

The Regional Connectivity Program should not limit the communication technologies as it will limit the creation of bespoke solutions.

In the case of agriculture the discussion paper states:

“having an NBN connection to the home does not necessarily mean there is also connectivity across the property. This can act as a barrier to the adoption of precision agriculture and other Internet of Things opportunities that require digital connectivity across the entire property.

The outcomes should not be limited to a range of “mobile and/or broadband solutions. LoRaWAN communication will provide a low-cost digital platform to deliver precision agriculture and other Internet of Things solutions.

LoRaWAN (**L**ong **R**ange Wide Area Network) is a long range, low power wireless communications protocol that is used in a lot of Internet of Things (IoT) networks worldwide. LoRa Technology enables a variety of smart IoT applications aimed at solving challenges like energy management, natural resource reduction, pollution control, infrastructure efficiency, disaster prevention, and more.

Question 2

Should other parties, for example local government authorities, business organisations or industry groups, be allowed to lead a bid for Regional Connectivity Program funding?

Enzen and NNNCo support the proposed criteria for funding applicants.

Question 3

Are there other organisations beside local, state and territory governments that could be considered ‘trusted sources of information’ for the purposes of identifying local telecommunications priorities?

Electricity, Gas and Water utilities are all converging IoT and spatial technologies with the objectives of improving customers services and choice, safety and security of supply. Some regional areas are also constrained in their economic development due to limitations in distributed energy. The utilities should be considered trusted sources of information for the purpose of identifying local telecommunications priorities.

Question 4

Are there ways that the Department can facilitate linkages between potential infrastructure providers and local communities?

The Department could run a discovery process with the utilities to identify opportunities. Spatial mapping overlays could be used to identify areas of greatest opportunities using a “place-based” evaluation criteria.

Question 5

Are there any comments that you wish to make in relation to co-contributions?

Nil comments.

Question 6

What type of projects should be considered for funding through the Regional Connectivity Program?

We suggest the following types of projects should be considered for funding through the Regional Connectivity Program:

- Agricultural programs
- Water management
- Energy management
- Community wireless
- Smart Remote Towns
- Environmental management
- Smart Aboriginal Communities – energy, water, street lighting, security
- Smart road intersections sensoring and lighting

Question 7

Are there any comments that you wish to make in relation the proposal that all Funded Solutions will provide Retail Services for a minimum of 10 years after the Asset has become operational?

No comments.

Question 8

Are there any comments in relation to the proposed Eligible and Ineligible Areas?

No comments.

Question 9

Are there any comments that you wish to make in relation to the proposed eligible and ineligible expenditure?

No comments.

Question 10

Are there particular circumstances where it may be appropriate for the Commonwealth to make some contribution to ongoing operating expenses?

Where the communication and IoT platform has a broader value proposition outside the community such as disaster, water and environmental management.

Question 11

Is there a case for a third category, for highly localised solutions for projects that, for example, are seeking funding of less than \$200,000 (GST inclusive)?

The economies of scope and scale should always be considered but this may exclude value being delivered to smaller communities if they cannot be aggregated into a broader program. We support

highly localised solutions seeking funding of less than \$200,000 if the projects cannot be aggregated into a program.

Question 12

Are there any other design principles that should be considered?

Solutions need to be able to scale and delivery appropriate cyber security outcomes.

Question 13

Do you have any comments on the proposed assessment criteria?

Innovation. The ability of proponents to introduce a broader range of digital and IoT services and innovation to the community.

Enzen Australia Pty Ltd and its invested company NNCo are appreciative of the opportunity to comment on the guidelines.

Yours faithfully

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