



REGIONAL CONNECTIVITY PROGRAM

Discussion paper submission

Wi-sky (NSW) submission

Responses to questions proposed by the discussion paper



Question 1

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

The fourth design principle

“Funding applicants must demonstrate that the proposed solutions are not currently or foreseeably being provided in the area”

This should be amended to be

“Funding applicants must demonstrate that the proposed solutions are not currently or foreseeably being provided in the area **or demonstrate that existing services are not adequate and need the proposed solution in the area.**”

The key change here is to identify when services such as 3g/4g or NBN fixed wireless are underperforming on a systematic basis and a proposed solution is not excluded from an area on the basis that it looks to be covered by these services.

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?

Carriers or Services providers with a Nominated Carrier declaration (NCD) should be allowed to apply for the funding. If other parties such as Government bodies, business groups or industry want to apply for this funding, they would need to partner with a carrier or NCD as a supporting organisation as they are not legally able to provide the services unless registered as a carrier or NCD. Government, business or industry groups backing the various proposals with a carrier or NCD provider should strengthen the case for the funding submissions. Other factors that would be key things to consider for successful applicants are groups showing past performance in delivery of such proposals and existing infrastructure in that area to leverage services from.

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?

Yes, local service providers that work in the industry and location would be more reliable in knowing the problem areas than relying on local / state government to be the primary source of trusted information. Local Governments mandate is essentially rates, rubbish and roads NOT telecommunications placement and the lack of knowledge of the industry could lead to poor decisions. Local Government has many other services to deliver and maintain and prioritisation of telecommunication spending over upgrading other keys services typically has been overlooked for more pressing community needs. State Government input would also lack the detailed local knowledge required to improve connectivity in problem areas.

I would propose two ways to ensure trusted sources of information

- 1) Allow people to apply for a position as a “trusted adviser” that is vetted and considered on the applicant’s credentials and experience in that location.

- 2) Setup a small localised panel (5-6 people) to cover an industry perspective, local government, community and business views

If either or both of these options were implemented the likely outcome for location-based solutions that are well suited and acceptable to the community would be achieved.

Question 4

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

- Support existing businesses with a proven track record of providing infrastructure in that area.
- Utilise the panel and or the trusted adviser's system to help the community consultation process be successful and well targeted.

Question 5

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

Question 6

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

Regional Connectivity funding should be for projects that aim to create and extend coverage of ground-based communication technologies to allow the best connectivity options to regional residents. Key project priorities should be for extensive investment in low impact ground-based facilities to try and achieve 100% coverage of rural areas, not just the higher populated zones. Utilisation of low impact facilities will give the best coverage, the best return on investment and a targeted solution for low density areas that miss out from main infrastructure points. These infrastructure points should be utilised for Broadband, narrowband and emerging technologies for the surrounding community.

Specific restrictions listed in this discussion paper that projects can't be in areas that 4G or NBN services currently operate in now are overlooking one of the main regional connectivity problems affecting residential consumers being congestion of these services. If this is a key point of the program that can't be negotiated, then not all of the factors to improving connectivity are being assessed. For example – if an NBN fixed wireless or 4G service in a particular area was congested each afternoon / night delivering half / quarter of the headline speed, an alternative connectivity solution should be allowed to be put forward as the current services are not performing adequately and unlikely to handle increased loads in the future. Comparable fixed wireless or 4g services could assist in easing congestion by spreading the load across more providers.

If the decision is to excludes funding solutions for NBN and 4g areas than it should also be required to adhere the same methodology to service coverage areas of smaller Wireless Internet service providers (WISP's) as well. If the proposed solution is a like for like solution within the service areas of the WISP it must be taken into account and treated like an ineligible area for other projects or the improvement project offered to that WISP to facilitate.

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?

This timeframe is acceptable but would note that if significant technological improvements make the infrastructure outdated or change its purpose, the asset life of 10 years might need to be assessed or the asset relocated for better use.

Question 8

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

Ineligible areas – I would like to clarify that all NBN -Fixed wireless coverage areas are not classified as ineligible areas only areas that have FTTN , FTTC, FTTB etc

Question 9

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

Question 10

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

Ongoing operating expenses should be considered in areas that average costs of wholesale services are well above the typically market rate for rural populated areas. If retail services are to be delivered at comparable markets service rates to consumers, then wholesale costs also need to be comparable.

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)?

Yes, highly localised solutions should be treated in their own category so that they are not lost in the mix for larger submissions. These submissions would typically be for challenging landscapes and small communities that are no less important than larger submissions.

Question 12

Are there any other design principles that should be considered?

- Short to medium term connectivity solutions can be implemented for regional communities whilst the long-term projects are undertaken.
- Perhaps projects and design on the its principles can be targeted for short / Medium term solutions and combined with a long-term approach each year for fibre wholesale access points.

Question 13

Do you have any comments on the proposed assessment?

- When taking into account the economic and social benefits will there be a clear criterion of assessment?
- What methodology of assessment will be used? What benchmarks will be targeted?
- Will other criteria for project delivery, financial contribution and value for money be equally weighted to social and economic benefits?