FIRST NATIONS
DIGITAL INCLUSION
ADVISORY GROUP

Telecommunications Performance and Regulation Section
Australian Communications and Media Authority
PO Box Q500
Queen Victoria Building NSW 1230

22/10/2025

To whom it may concern,

Thank you for the opportunity to provide feedback on the proposal to amend the Prepaid Determination (the proposal). We are writing to you as co-chairs of the First Nations Digital Inclusion Advisory Group (the Advisory Group).

The Advisory Group was established in January 2023 by the Minister for Communications to provide advice on Target 17 of the National Agreement on Closing the Gap: that First Nations Australians have equal levels of digital inclusion by 2026. Target 17 underpins Outcome 17 of the National Agreement, which is focused on ensuring First Nations Australians have access to information and services to enable informed decision-making regarding their own lives and communities.

In developing our advice, including the *First Nations Digital Inclusion Roadmap: 2026 and beyond* which we launched in December 2024, we have considered the links between First Nations digital inclusion and Digital ID, including how to ensure the introduction of Digital ID does not negatively impact on the ability of First Nations Australians to access information and services online. We recommend the ACMA consider First Nations digital inclusion as a guiding principle in the amendment to the Prepaid Determination, to help mitigate any potential impact.

While we recognise that the use of Digital ID for activating prepaid mobile services may provide savings for telecommunications providers and improved convenience for digitally included Australians, the Advisory Group is concerned about the potential impact on vulnerable groups, including First Nations people, many of whom lack access to traditional identification documents.

We understand that Digital ID may not be mandatory at this stage, however, we believe there is a risk that traditional or alternative methods of ID may be phased out by providers over time, with the result that Digital ID will become the default option for access. This is a particularly critical issue given the reliance on prepaid mobile services across First Nations communities. This highlights the need for flexibility, education and on the ground face to face work needed as wrap around support for our communities to fully engage with and participate in Digital ID. The Advisory Group recommends the Prepaid Determination – and any related guidance to providers – explicitly outline their ongoing responsibility to continue to provide these traditional or alternative methods.

The Advisory Group has also heard that government and industry websites can be difficult to navigate, and use overly bureaucratic language that is not appropriate in a First Nations community context. The Advisory Group recommends the ACMA consider including a requirement on providers to ensure information about prepaid access and services is culturally appropriate, including translation of materials into First Nations languages, where needed.

We have also heard from First Nations communities that redress mechanisms for outages of prepaid contracts are often difficult to pursue, requiring affected consumers to gather evidence and lodge manual complaints via industry websites. Conversely, consumers who operate on post-paid contracts are offered greater protections, including credit and data-rollovers in the case of service outages. These issues have a

significant impact on access and affordability for many First Nations consumers. The Advisory Group recommends that any proposed amendments to the Prepaid Determination consider expanding consumer protections for prepaid customers, noting the disparity in protections for those on post-paid contracts.

Thank you for this opportunity to provide feedback, and we would be happy to meet with you to discuss the issues outlined above further. If you would like to discuss our submission, please contact our secretariat at firstnationsdigitalinclusion@infrastructure.gov.au

Yours sincerely





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