



Submission to the Funding of Universal Telecommunications Services Review

The First Nations Digital Inclusion Advisory Group (Advisory Group) welcomes the opportunity to provide an additional submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) Funding of the universal telecommunications services discussion paper. This submission builds on our previous submission which can be found here: [Submission to the Better Delivery of Universal Services Review](#).

Although the matter of funding arrangements is usually the concern of government and telecommunication providers, it is clear that these arrangements can have a flow on effect on First Nations consumers who rely on the Regional Broadband Scheme (RBS) and Telecommunications Industry Levy (TIL) to provide a safety net.

At a high level the Advisory Group agrees on the principles outlined in the discussion paper, specifically sustainability, transparency, certainty and flexibility for First Nations communities.

Transparency and Certainty

What characteristics would provide adequate certainty to those parties from whom funds would be collected?

- Specific allocation of funding for First Nations communities who are unconnected or underserved

The Advisory Group recommends that a portion of any funding for Universal Telecommunications Services be allocated for First Nations communities who have often missed out on funding opportunities due to the competitive and bureaucratic nature of grants and other initiatives that may assist in meeting their connectivity needs. Specific allocated funding provides certainty for both First Nations communities and providers to work in partnership and develop appropriate place-based solutions.

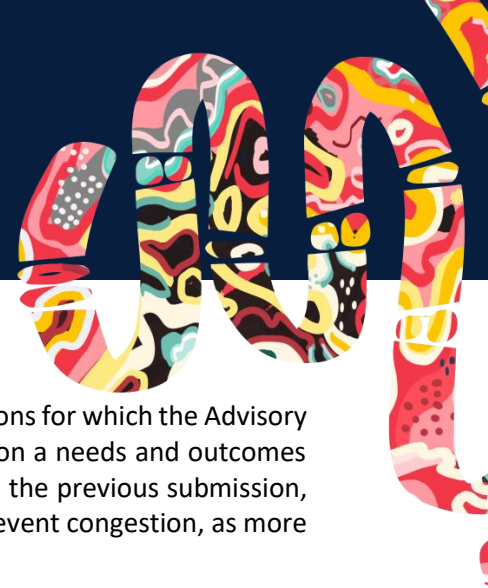
Although we should caution against using too restrictive characteristics which could result in arbitrary exclusion for communities. Basic parameters in determination of funds could include: regional, rural and remote communities where the majority of the population identify as First Nations and are currently underserved in regards to basic phone call and internet connectivity.

Flexibility

How can the funding arrangements best support provision of non-commercial services but also support flexibility in adapting to market changes and the types of services supported?

- Funding needs to be linked on the needs and desired outcomes of unconnected/poorly serviced First Nations communities

As outlined in our previous submission, Universal Telecommunications Services need to be flexible for the unique cultural and geographical considerations of First Nations communities and to enable take up



of emerging technologies at scale. This goes to the heart of place-based solutions for which the Advisory Group has strongly advocated. For this reason, funding should be allocated on a needs and outcomes basis instead of being tied to a specific provider or technology. Also noted in the previous submission, quality of service needs to be an important factor and funding adjusted to prevent congestion, as more people go online and data demand increases.

Although the Advisory Group is aware this may hinder the certainty required for providers to commit to investing in the infrastructure required to deliver services in otherwise non-commercial areas. It may just as equally promote competition, innovation and encourage the involvement of more local and smaller providers. Flexibility can also encourage providers to take advantage of newer technologies and service First Nations communities which have been previously economically unviable due to being constrained by current funding arrangements or older technologies.

Services that should be subsidised

What are the characteristics of services that should be receiving subsidies? How should these be determined on an ongoing basis?

- Services that are required in accessing emergency calls and social services should be considered for subsidies
- Funding can also be linked to maintain government initiatives/programs that provide positive outcomes for First Nation communities

Services that should be subsidised include ensuring connectivity for all First Nations households is affordable and meets the need of the community. This also includes the provision of older technologies such as community payphones which can also act as a Wi-Fi hub or newer technologies such as LEOsats.

However, this can go beyond the infrastructure itself and include the sale of subsidised device handsets as mechanisms which can provide a safety net for connectivity for First Nations people, their households and communities. With LEOsats becoming more prominent, this may also mean Direct-to-Device (also known as D2D) could potentially reduce the need for more expensive and difficult to maintain infrastructure.

Both Commonwealth, State and Territory governments often implement digital access solutions that receive large amounts of initial funding or capital investment but are short lived due to the lack of ongoing maintenance. A modern universal services framework should be able to maximise and prolong these investments where the program achieves basic core principles such as ensuring users have basic access, providing resilience/redundancy to the core communications network and allowing individuals to contact emergency and essential services.

This also ensures that programs and investments are regularly reviewed after implementation, with successful programs sustained for the long-term and capacity increased as more people go online to maintain a consistent quality of service, while others can be revised and lessons learnt to ensure greater success in the future.

There is ongoing interest in network resilience particularly in relation to service availability after natural disasters. Is this something that should be supported through funding for non-commercial



services or should all network providers be equally required to provide a specified level of resilience in their own networks?

- Emergency calls (000) must work at all times regardless of flooding, power outage and network outages.
- Regardless of solution, there needs to be a backup/alternative if disconnection occurs due to natural disasters or even power outages

With the impacts of climate change and increasing natural disasters, there is a need to ensure that all Australians, regardless of their location are able to access emergency calls.

Depending on the type of solution/infrastructure in place this could mean routing to satellite if cables are damaged. Mobile roaming for emergency services must be a consideration and basic reliable power supply with solar backup and 12-hour minimum battery life throughout the network.

Conclusion

While we recognise that the specific funding mechanisms related to the Universal Service Framework are generally a concern for government and providers, it is still critical to consider the impact that these mechanisms can have on First Nations communities.

This means ensuring those mechanisms are centred on the needs and interests of First Nations people (who remain one of the most digitally excluded cohorts in Australia) and that they ensure all Australians have access to essential telecommunications services regardless of where they live and their current circumstances.

The co-chairs of the Advisory Group, Ms Dot West OAM and Associate Professor Lyndon Ormond-Parker would welcome a meeting with Departmental representatives to discuss the issues raised in this submission or previous submissions.

The co-chairs can be contacted via FirstNationsDigitalInclusion@infrastructure.gov.au