

CommsDay Congress Speech - 9<sup>th</sup> October 2019

Before I begin I would like to take this opportunity to acknowledge the traditional custodians of this land, the Boon Wurrung and Woiwurrung (Wurundjeri) peoples of the Kulin Nation, and pay my respects to the Elders past, present and emerging.

Thank you to Grahame and the Comms Day team for having me at this year's Comms Day Congress. It's always exciting to see what a stellar line-up you produce year after year.

With the end of 2019 now in sight, Australia is at a cross-road when it comes to our communications services. The completion of the NBN roll-out is just around the corner and it is time to discuss what is next in telecommunications, and what it means for consumers. This afternoon, I want to speak to three main points:

- The future of NBN pricing
- The importance of reliability in telco services
- And why we need to do more to promote accessible telecoms

I'll also provide a brief update on the Regional, Rural and Remote Communications Coalition.

As of the end of August, just over half (57%) of Australian households and businesses that can take-up the NBN have chosen to do so. This begs the question: what is the barrier for the remaining 4.3 million that have not made the switch? While there is no one-size-fits-all answer, we know that the affordability of NBN services is a serious hurdle for many Australians.

We're not alone in acknowledging this fact. Since launching our call for affordable broadband in February, our message has echoed far and wide.

More than 35 advocacy groups have joined us in highlighting the need to take action to ensure that no Australian is left offline, including The Smith Family, National Farmers' Federation and National Seniors. Importantly, we've also seen increasing support across the telco industry; from various RSPs to NBN Co whose latest consultation paper recognises that broadband affordability remains an important issue for many across the country.

It will come as no surprise to you all that ACCAN will be supporting the concept of targeted solutions for low income households as proposed in NBN Co's second pricing review consultation paper. While broadband affordability is undoubtedly a national issue, we know that Australia's poorest households pay three times more of their income to stay online than their more fortunate counterparts. If NBN prices remain as they are, these households will eventually be forced to make a difficult decision: do they cut the cord and miss out on access to education, employment and government services? Or do they try and adjust their limited budgets to ensure that they stay connected? With government statistics showing that over 15% of Australia's most-vulnerable people have struggled to pay a utility bill on time, many will simply not have this option.

I want to quickly share a story with you. Just the other week we had a consumer call up to share her experience with broadband affordability. We'll call her Wendy. Wendy is a pensioner from North Sydney. She's an

active member of her local seniors' computer club, uses social media to engage with local community events and video chats with her family members who live overseas. Access to a home broadband service has opened up Wendy's life in many ways. But come the end of the month, when her combined home phone and internet bill arrives in the post, she doesn't always know where she will find the \$95 she pays to stay connected. Often, there is a juggling act, a re-prioritising of costs. Because no matter what, Wendy needs to stay online. Not only for her social connection, but to access vital government services. Wendy's story is sadly not unique. We have heard countless stories of the struggles of affordable home broadband and the impacts that going without has, such as families with young children who are forced to do their homework from their car in the school parking lot to use the school's Wi-Fi. A targeted concessional NBN product could be game-changing for these Australians. When taken up by households, it also has the potential to unlock the economic potential of the NBN: increasing average incomes, creating new businesses, and increasing tax revenues through higher economic activity, and reduced unemployment. This is a key opportunity to make a difference to everyday Australians and we look forward to working closely with the industry and NBN Co to move forward with a timely and productive consultation process on these targeted concessional products.

The second element of the NBN pricing review that I'll quickly touch on is the proposed changes to the current structure of the entry level 12Mbps service. As both ACCAN and the ACCC have highlighted, 12Mbps

broadband plans still play an important role in the market, especially for the nearly 1.2 million consumers on low and fixed incomes who really only want an ADSL equivalent service. Although we're supportive of the proposed revised pricing, the fact remains that the 12Mbps broadband plan is an expensive service for what you get. For around \$41.00 wholesale, consumers are given a service with limited speeds that don't even meet the minimum speed requirements of the Government's own proposed Telecommunication Reform Package.

The next issue that must be addressed is the reliability of our telco services.

Now, I will take this opportunity to acknowledge that the latest TIO Annual Report showed that telco consumer complaints have fallen over 21 per cent year-on-year. This is good news. But, as consumer advocates we do still have to point out that over 132,000 Australians had such issues with their service or provider that they had to escalate a complaint to the Ombudsman. We also saw complaints about internet services overtake complaints about mobile services as the most complained about service type during this latest reporting period. With internet services now a necessity in the day-to-day lives of Australians, it is fair to say that this is a disappointing result.

So, what needs to change? One key part of the puzzle is bringing reliability consumer protections into the 21<sup>st</sup> century. Currently, the Customer Service Guarantee only applies to fixed-voice phone services. This is dramatically out of touch with how most of us now communicate.

The ACMA's latest communications report shows that calls and texts from mobile phones, email, social networking and messaging and calling apps have all surpassed the traditional landline as Australians' preferred methods of communication. This has been the trend for nearly three years now, yet our regulation is still lagging behind. While safeguards are enshrined for connection and repair times for traditional landline phones, it is time for both voice-only services over the NBN and fixed-line broadband services to be guaranteed the same protections. As the ACMA's first complaints-handling report showed, telcos received 490 complaints per 10,000 NBN voice-only services in operation, and 331 complaints per 10,000 non-NBN fixed broadband services in operation. As the top two reasons for consumer complaints, it is clear that action needs to be taken.

ACCAN would like to see connection and repair times for broadband services to be at least the same as those in the existing Customer Service Guarantee, and for them to be defined in terms of days, rather than working days. This is important as mandatory connection and repair timeframes are longer over weekends and public holidays. However, the real need to be connected to these essential services doesn't change whether it is a working day or not. Individual and small business consumers rely on continuous access to voice and data services and so it is vital that mandatory connection and repair timeframes reflect that.

In addition to these reliability safeguards, we were pleased to see last week that the ACCC had adopted a number of ACCAN's recommendations in their draft decision as part of the NBN wholesale service standards

inquiry. These included applying rebates for delayed connections and fault repair on a daily basis rather than on a one off basis, and ensuring that these payments go directly to consumers. This is important because the consumer harm of unreliable broadband services goes beyond the frustration of not being connected or the loss of productivity to businesses; a service disconnection brings with it the often painful experience of having the issue corrected. The ACCC's draft decision acknowledges that consumers' time is valuable. When people take time off of work to wait for an NBN contractor who doesn't arrive, it is only fair that they receive some compensation for the inconvenience. The question that remains is how this will be enforced. We know that the ACCC has proposed that NBN Co's wholesale contracts require retail service providers to provide missed appointment rebates to be passed on to consumers but there has been no mention of how these compensations would be enforced for late connections and faults. We need regulation to ensure RSPs act in the interest of consumers and pass on all appropriate compensation.

In discussing the reliability of telco services, we of course must mention the Federal Government's Consumer Safeguards Review – specifically, Part B: Reliability of Services. Submissions into this part of the Review closed in January and we are yet to hear any word as to when the Government will release their response. The Government has created a positive opportunity to evaluate the consumer protections in place for telco reliability and how they can be improved. In the interest of Australians, the Government must respond to the Review and soon.

Reliability is also a theme of the revised asks of the Regional, Rural and Remote Communications Coalition.

These updated asks were launch by representatives from the RRRRCC's 21 member organisations who travelled to Canberra to meet Members and Senators of the new Parliament with the aim to highlight the opportunities that connectivity presents for regional Australia and the ongoing limitations that regional consumers face.

As you can see behind me, the key asks of this group are for:

1. Guaranteed access to voice and data services
2. Equitable voice and data services that meet minimum standards and reliability
3. A 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

While meeting with dozens of politicians from all sides of politics, a clear theme emerged: without affordable, reliable communications, the digital divide between city and country will deepen. The latest Digital Inclusion Index also supports this point – while progress has been made, there is ongoing inequity in the access to telecommunications experienced by Australians living in regional, rural and remote areas, compared to their urban counterparts. If we are to make the most of the opportunities

telecommunications can provide, we need to make sure that those in our regions have guaranteed access to equitable voice and data services that meet minimum standards and reliability.

Finally this afternoon, I'd like to discuss ACCAN's Accessible Telecoms project. For those of you who are unfamiliar with Accessible Telecoms, it is an interactive website and call centre that provides up-to-date, appropriate and independent information about telecommunications equipment and services available for Australians with disability.

Accessible Telecoms was born out of a clear community need for information on the accessibility features of both mainstream and assistive telecommunications products that are suitable for people with disability. While many of us simply look for the phone with the latest and greatest camera or biggest amount of storage, there are countless other considerations for people with disability when exploring buying telecommunications equipment. For people with vision-impairment, having a device that can act as a screen reader may be especially important, while for someone who is Deaf or has a hearing impairment, having a front-facing camera that has sufficient resolution to communicate through sign language can be a game-changer. Having the appropriate tools for communication can open up a wide array of opportunities for people with disability, from socialising with family and friends, to accessing emergency services.

Since launching in December last year, we have had tremendous feedback on Accessible Telecoms from a wide array of consumers. The

website has received over 17,000 unique page views, and our call centre, operated in partnership with IDEAS, has helped many Australians find the right communication tool for them.

The success of Accessible Telecoms is also due in part to the strong industry support that we have received over the past year: thank you to Telstra, Optus, Vodafone and AMTA for including links to the Accessible Telecoms project on your websites. We also look forward to working with telcos to further to roll-out information about Accessible Telecoms through their storefronts.

We believe that by working together with industry, we can bridge the knowledge gap of telecommunications equipment and services available for Australians with disability.

Telecommunications can be a paradoxical space. While the world of new telco technology development seems to leap ahead year after year, the realm of regulations and safeguards can often lag far behind. As the voice for Australia's phone and internet consumers, ACCAN has the proud role of advocating on behalf of everyday Australians to bring these two often divergent worlds together. Though there will always be more work to be done, we're pleased to have worked together with many of you in this room to ensure that the rights and protections of telco consumers are at the forefront of the conversation in the ever-changing telco space.

Looking forward to 2020, we will have new challenges to face as the NBN roll-out finishes and the 5G roll-out accelerates. The industry has a strong responsibility to ensure that consumers are not mis-sold these new

technologies (that includes clearly advising if 5G capability on a network's phone does not work indoors, as any layperson would rightly expect). We also know that there is an increasing amount of consumer concern around 5G and its health impacts. This is an important community anxiety that can't be pushed aside as the worry tin-foil hatters. You need to hear their concerns and undertake proper community engagement to assuage these fears.

We look forward to continuing to work with our industry counterparts in this exciting new decade. Thank you.