Pre-Budget Submission 2023-2024

Submission by the Australian Communications Consumer Action
Network to the Australian Treasury

27 January 2023

About ACCAN

The Australian Communications Consumer Action Network (ACCAN) is the peak body that represents all consumers on communications issues including telecommunications, broadband and emerging new services. ACCAN provides a strong unified voice to industry and government as consumers work towards communications services that are trusted, inclusive and available for all.

Consumers need ACCAN to promote better consumer protection outcomes ensuring speedy responses to complaints and issues. ACCAN aims to empower consumers so that they are well informed and can make good choices about products and services. As a peak body, ACCAN will represent the views of its broad and diverse membership base to policy makers, government and industry to get better outcomes for all communications consumers.

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Introduction

The Australian Communications Consumer Action Network (ACCAN) thanks the Australian Treasury (the Treasury) for the opportunity to submit to the pre-budget consultation and provide our views on priorities for the 2023-2024 Australian Budget. ACCAN's response to this consultation is structured around our 2022-2023 policy priorities,[1] which have been developed in close consultation with our members and our understanding of the needs of communications consumers around Australia.

Digital inclusion and accessibility are essential towards enabling all people, including those with disability to achieve economic and social inclusion. Economic participation is predicated on access to affordable and reliable communications services. Digital inclusion enables people to have improved financial capacity, greater access to core services and increased digital skills.[2]

Promoting digital inclusion is key to achieving the Australian Government's Digital Economy Strategy and to boosting productivity and living standards for Australians.[3] However, 11 per cent of Australia's population remain 'highly digitally excluded', while 14 per cent of all Australians need to pay more than 10 per cent of their household income to gain quality, reliable connectivity.[4]

Greater consumer choice and engagement with telecommunication services can be facilitated through a fair and competitive telecommunications market. The telecommunications market must protect and uphold the rights of consumers, while also promoting fair and equal competition between telecommunications service providers. Our submission calls on the Australian Government to address these areas in the 2023-2024 Australian Budget by:

- Allocating funding to make essential communications goods and services more affordable and accessible for consumers.
- Allocating funding to make the communications market fairer, including by establishing an independent plan comparison tool.
- Financially supporting digital inclusion initiatives, including coordinated and targeted efforts to improve First Nations' digital inclusion.
- Allocating funding to support consumer representation in digital platforms policy.
- Guaranteeing long-term funding for ACCAN's Accessible Telecoms project and supporting other efforts to promote communications accessibility, including the ongoing funding of audio described content on free-to-air commercial television.

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[1] ACCAN, *Policy priorities 2022-23*, June 2022 https://accan.org.au/files/Policyper cent20Positions/PPper cent202022-23/ACCANper cent20Policyper cent20Prioritiesper cent202022-23.pdf.

[2] Lloyds Bank, *2022 consumer digital index,* pp. 4-6, November 2022 https://www.lloydsbank.com/assets/media/pdfs/banking_with_us/whats-happening/221103-lloyds-consumer-digital-index-2022-report.pdf.

[3] Commonwealth of Australia, Department of Prime Minister and Cabinet, *Digital Economy Strategy 2030*, May 2021 https://apo.org.au/sites/default/files/resource-files/2021-05/apo-nid312247.pdf.

[4] J Thomas, J Barraket, J, S Parkinson, C Wilson, I Holcombe-James, J Kennedy, K Mannell and A Brydon, *Measuring Australia's digital divide: Australian Digital Inclusion Index: 2021,* Melbourne RMIT, Swinburne University of Technology, and Telstra, October 2021, p. 6, DOI: 10.25916/phgw-b725 https://h3e6r2c4.rocketcdn.me/wp-content/uploads/2021/10/ADII_2021_Summary-report_V1.pdf.

List of recommendations

Recommendation 1: That the Australian Government allocates funding to NBN Co to offer a 50mbps service at a concession of $20 per month to households receiving Commonwealth financial support.

Recommendation 2: That the Australian Government invests in a trusted, independent online plan comparison tool for phone and internet services, to give greater choice to consumers.

Recommendation 3: That the Australian Government funds and allocates accessible and affordable devices to people on low incomes without devices.

Recommendation 4: That the Australian Government provides funding to the Australian Communications and Media Authority to investigate and monitor mobile outages and identify initiatives to improve mobile reliability across Australia.

Recommendation 5: That the Australian Government continues to fund the Australian Competition and Consumer Commission Measuring Broadband Australia Program, including its expansion to NBN Sky Muster services and continued monitoring of Fixed Wireless services.

Recommendation 6: That the Australian Government commits to ongoing investment of the Mobile Black Spot Program, and the Regional Connectivity Program.

Recommendation 7: That the Australian Government allocates funding to the Mobile Black Spot Program to:

- Promote access to 24-hours of auxiliary back-up power in isolated areas.
- Provide additional support to enable local communities to broker partnerships through facilitators and resources.

Recommendation 8: That the Australian Government co-invests with the digital platforms industry to support a consumer organisation to represent the interests of the Australian community in decision making for digital platform policy.

Recommendation 9: That the Australian Government provides ongoing funding that invests in and develops local-level, place-based and co-designed solutions to support the digital inclusion of First Nations communities.

Recommendation 10: That the Australian Government commits, in the 2023-2024 Australian Budget, to provide ongoing funding of the Accessible Telecoms service.

Recommendation 11: That the Australian Government allocates funding to ensure government websites are compliant with the Web Content Accessibility Guidelines (WCAG) 2.1 AA and successor standards.

Recommendation 12: That the Australian Government allocates funding to ensure online government services are presented in a variety of accessible formats, including Auslan, Braille, Plain Language, Easy-English and different community languages.

Recommendation 13: That the Australian Government provides funding to deliver co-designed digital education and training programs to people with disability, including older Australians and children with disability.

Recommendation 14: That the Australian Government commits to annual funding of a minimum of 14 hours of audio-described content on all free-to-air commercial television channels, including SBS and ABC.

Affordable telecommunications for all

Affordable communications services play an essential part in increasing social, economic and educational opportunities for all Australians. For many low-income households however, the cost of telecommunication services can represent a significant proportion of their total income.

Research conducted by ACCAN in April 2022 on consumers views about the affordability of phone and internet services, identified the following:

- 90 per cent thought that telcos should provide an affordable internet plan as standard so that everyone can remain connected.
- 82 per cent viewed a home internet connection as essential.
- 27 per cent said their phone and internet services were unaffordable.[5]

These findings align with previous research identifying significant affordability challenges for low-income households. A research report prepared for ACCAN by Action Market Research in September 2021, surveyed 807 respondents from low-income households.[6] The survey identified the following:

- More than 50 per cent of all respondents experienced some form of difficulty in affording to pay for the phone and internet services they were currently connected to.
- Of those respondents who wanted to connect to the NBN or another broadband service, the main reasons for not connecting related to having other more important expenses that take priority (23 per cent), followed by simply not being able to afford the service at all (23 per cent).
- 42 per cent of those who have not connected to NBN have not done so due to affordability issues.[7]

Low-income earners have also faced ongoing difficulties in accessing affordable devices, particularly those provided through telephone, landline and internet services.[8] The latest Australian Digital Inclusion Index in 2021, revealed that low-income householders found it challenging to access affordable devices for employment and education purposes, particularly during the ongoing Covid-19 pandemic.[9]

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[5] ACCAN, *90 per cent of Australians think telcos should offer affordable internet plans,* July 2022 https://accan.org.au/media-centre/media-releases/2004-90-of-australians-think-telcos-should-offer-affordable-internet-plans.

[6] Action Market Research, *Addressing telecommunications affordability: Evaluating support for low income consumers,* September 2021, p.50 https://accan.org.au/files/Reports/Addressingper cent20Telecommunicationsper cent20Affordabilityper cent20Evaluatingper cent20Supportper cent20forper cent20Lowper cent20Incomeper cent20Consumers.pdf.

[7] Ibid, p. 89.

[8] Ibid, p. 9.

[9] J Thomas, J Barraket, J, S Parkinson, C Wilson, I Holcombe-James, J Kennedy, K Mannell and A Brydon, *Measuring Australia's digital divide: Australian Digital Inclusion Index: 2021,* , Melbourne RMIT, Swinburne University of Technology, and Telstra, October 2021, p. 3, DOI: 10.25916/phgw-b725 https://h3e6r2c4.rocketcdn.me/wp-content/uploads/2021/10/ADII_2021_Summary-report_V1.pdf.

These findings speak to the difficulties consumers face in affording phone and internet services and the need for urgent government action. ACCAN has welcomed the measures announced in the 2022-2023 Australian Budget to improve access to internet affordability, including:

- The provision of a free NBN service for 12 months to 30,000 families that have gone without in-home internet.
- The commitment to expanding full-fibre access for an additional 1.5 million premises, including 600,000 premises in regional Australia.[10]

While ACCAN is supportive of the initiatives introduce to date, further action is required to address the affordability of NBN services. For example, access to NBN services for low-income households, can also be achieved by NBN Co offering a 50mbps service at a concession of $20 per month available to households receiving financial support from the Australian Government.[11]

ACCAN recommends that a potential concession should be considered by the Australian Government in the upcoming budget. Providing this support to low-income households will significantly improve their access to NBN services and their capacity to contribute to positive social and economic outcomes under the Australian Government's Digital Economy Strategy.

Improving affordability can also be supported by making it easier for consumers to navigate the telecommunications market. Consumers are often at a disadvantage when finding suitable telecommunications services and products, due to their lack of knowledge about available offers. Consumers overwhelmingly agree (88 per cent) that it should be easier to find and compare information about phone and internet plans.[12] To facilitate this, an Independent plan comparison tool (IPCT) for the telecommunications sector should be introduced to provide independent and complete information about voice, data, and broadband products and services. The IPCT should be free, accessible, and easy to use.[13] The establishment of an IPCT will provide consumers with key product and price information for telecommunications services, allowing them to select a service offering that best meets their needs.

The affordability of devices also continues to be a challenge for many consumers. Research undertaken by Action Market Research found that 16 per cent of respondents struggled to afford a device such as a mobile, tablet or laptop.[14] Respondents from this research rated hardware or device affordability supports as the second highest type of support that would help them with phone and internet affordability.[15] These findings reinforce the essentiality of affordable devices to enable low-income earners to access social, economic and educational opportunities, and to engage with phone and internet services.

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[10] ACCAN, *Affordability and digital inclusion measures welcomed by advocates,* October 2022 https://accan.org.au/media-centre/media-releases/2027-aaffordability-and-digital-inclusion-measures-welcomed-by-advocates.

[11] ACCAN, *No Australian Left Offline: Affordable Broadband for All* https://accan.org.au/files/Affordability/No%20Australian%20Left%20Offline-1.pdf.

[12] ACCAN, ACCAN research snapshot: *Consumer expectations – reliability and fairness,* August 2022, p. 16 https://accan.org.au/files/Reports/ACCANper cent202022per cent20Researchper cent20Snapshotper cent20Reliabilityper cent20andper cent20Fairness.pdf.

[13] Ibid.

[14] Action Market Research, *Addressing telecommunications affordability: Evaluating support for low income consumers,* September 2021, p. 80 https://accan.org.au/files/Reports/Addressingper cent20Telecommunicationsper cent20Affordabilityper cent20Evaluatingper cent20Supportper cent20forper cent20Lowper cent20Incomeper cent20Consumers.pdf.

[15] Ibid.

> **Recommendation 1:** That the Australian Government allocates funding to NBN Co to offer a 50mbps service at a concession of $20 per month to households receiving Commonwealth financial support.
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Increased reliability and better infrastructure

Reliable communications services are necessary for all people, including people with disability to complete everyday tasks and access services and information.

Safeguards and standards are required to monitor and regulate the quality and reliability of broadband services, including the NBN, as well as mobile services. This is important because mobile outages restrict access to secure and efficient phone and broadband services, including in regional and remote communities. As such, the Australian Communications and Media Authority should be given funding to investigate, monitor and respond to mobile outages across Australia.

Localised and place-based solutions are required to address black-spot, reliability and connectivity issues in specific areas, including rural, regional and remote communities. In the 2022-2023 Australian Budget, the Australian Government committed to the following under their Better Connectivity Plan for Regional and Rural Australia:

- $400 million to boost multi-carrier mobile coverage on regional roads, improve mobile coverage in under-served regional and remote communities, and increase the resilience of communications services and public safety communications facilities.[16]
- $200 million for two further rounds of the Regional Connectivity Program to improve connectivity in regional, rural and First Nations communities.[17]
- Additional rounds of the Mobile Black Spot Program, including $50 million for Mobile Black Spot Solutions to deliver New Handheld Coverage to regional, rural and remote Australia.[18]

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[16] Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *Regional Connectivity Program (including Mobile Black Spot opportunities)* https://www.infrastructure.gov.au/media-communications-arts/internet/regional-connectivity-program-including-mobile-black-spot-opportunities.
[17] Ibid.
[18] Australian Government, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, *Regional Connectivity Program Round 3 (including Mobile Black Spot opportunities) grant opportunity draft guidelines,* December 2022, p. 6. https://www.infrastructure.gov.au/sites/default/files/documents/regional-connectivity-program-round-3-including-mobile-black-spot-opportunities-grant-opportunity-draft-guidelines.pdf.

ACCAN supports the above commitments and recognises the importance of providing ongoing investment to expand these programs and improve connectivity in regional and remote communities. To enhance connectivity in regional and remote communities, funding could also be allocated to the Mobile Black Spot Program to:

- Promote access to 24-hours of auxiliary back-up power in isolated areas.[19]
- Provide additional support to enable local communities to broker partnerships through facilitators and resources.[20]

Adopting these commitments in the 2023-2024 Australian Budget, will play a significant role in ensuring all Australians have access to reliable communications services.

> **Recommendation 4:** That the Australian Government provides funding to the Australian Communications and Media Authority to investigate and monitor mobile outages and identify initiatives to improve mobile reliability across Australia.
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> **Recommendation 5:** That the Australian Government continues to fund the Australian Competition and Consumer Commission Measuring Broadband Australia Program, including its expansion to NBN Sky Muster services and continued monitoring of Fixed Wireless services.
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Growing consumer confidence

Consumers feel confident when they are protected from unwanted or anticipated harms, scams and misinformation online. Consumer confidence, however, has been detrimentally impacted by a rise in digital scams perpetuated through digital platforms. The Australian Competition and Consumer Commission (ACCC) reports that losses from social networking and mobile app scams, almost doubled between 2020 ($49 million) and 2021 ($92 million).[21] Additionally, the ACCC estimates that only 13 per cent of victims report their scam and the actual sum of money lost to scams is likely

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[19] For further detail see ACCAN*, ACCAN submission to the Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines,* November 2022, p. 1 https://accan.org.au/files/Submissions/2022/DITRDCAper cent20MBSPper cent20IMCRper cent20Grantper cent20Opportunityper cent20Guidelinesper cent20FINALper cent202022.pdf.

[20] Ibid.

[21] Australian Competition and Consumer Commission, *Digital platform services inquiry: Interim report No. 5 – regulatory reform*, November 2022, p. 9, www.accc.gov.au/publications/serial-publications/digital-platform-services-inquiry-2020-2025/digital-platform-services-inquiry-september-2022-interim-report-regulatory-reform.

much higher. Fake reviews are also a high cause for concern for the ACCC, impacting on 900 million dollars of spending in 2021.[22]

A central focus of the 2023-2024 Australian Budget therefore, should be increasing consumer confidence online. This involves providing greater protection and representation of consumers interests and creating a safer online environment. The Treasury is currently in consultations to introduce new regulations for digital platforms.[23]

Ensuring that the regulation of digital platforms reflects consumer interests requires extensive consultation with consumers and consumer representatives. However, at present, there is no funded consumer voice in the digital platforms space, making it difficult to protect and represent the interests of consumers. To protect and represent the interests of consumers, it is necessary for the Australian Government to provide funding to support a consumer body to engage on matters of digital platform regulation.

> **Recommendation 8:** That the Australian Government co-invests with the digital platforms industry to support a consumer organisation to represent the interests of the Australian community in decision making for digital platform policy.

First Nations communities and digital inclusion

Closing the digital divide for First Nations communities is critical for Australia to become a leading digital economy by 2030.[24] According to the National Agreement on Closing the Gap, by 2026, First Nations peoples should have equal levels of digital inclusion compared to other Australians (see Target 17).

Despite these aspirations, in 2023, one in four First Nations households still need access to the internet in Australia. The digital divide for First Nations peoples and communities also increases with remoteness, with only 49.9 per cent of First Nations peoples living in very remote areas have access to the internet.[25]

As illustrated in the First Nations communities of Ali Curung in the Northern Territory and Pormpuraaw in far north Queensland, due to a lack of internet access there is a heavy reliance on mobile connectivity.[26] The report also highlighted a major barrier to ensuring equal levels of digital inclusion for First Nations peoples was the cost of telecommunications in regional, rural, and remote Australia.[27]

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[22] World Economic Forum, *Fake online reviews cost $152 billion a year. Here's how e-commerce sites can stop them*, August 2021, www.weforum.org/agenda/2021/08/fake-online-reviews-are-a-152-billion-problem-heres-how-to-silence-them/.

[23] See, Commonwealth of Australia, The Treasury, *Digital platforms- consultation on regulatory reform*, December 2022 https://treasury.gov.au/consultation/c2022-341745.

[24] Commonwealth of Australia, Department of Prime Minister and Cabinet, *Digital Economy Strategy 2030*, May 2021 https://apo.org.au/sites/default/files/resource-files/2021-05/apo-nid312247.pdf.

[25] World Vision Australia and Australian Literacy and Numeracy Foundation, *Connecting on Country: Closing the digital divide for First Nations students in the age of COVID-19,* March 2021, pp. 5-6, https://www.worldvision.com.au/docs/default-source/publications/government-submissions/connecting-on-country.pdf.

[26] Australia Digital Inclusion Index, *First Nations,* https://www.digitalinclusionindex.org.au/first-nations/.

[27] Ibid.

In response to these findings, in 2020, ACCAN commissioned an independent review of remote First Nations communications, which identified several key issues that required more targeted and placed-based solutions, including:

- Affordability, quality and reliability of services.
- Last mile access, such as WiFi services, and community access facilities.
- Free access to government and online services.
- Digital skills and cyber-security issues.
- Accessibility of online services for people with limited English, text literacy or disabilities.
- Cultural and contextual awareness of service providers working with remote communities.[28]

Since commissioning this research, ACCAN's Indigenous Steering Committee has called for the Australian Government's Indigenous Digital Inclusion Plan, to be led by First Nations communities to better support their experiences of digital inclusion.[29] This aligns with our policy recommendations that the Australian Government:

> Invest in local-level, place-based, and co-designed solutions to resolve mobile connectivity gaps and promote digital inclusion in First Nations communities.[30]

ACCAN welcomes the Australian Government's recent announcements of the First Nations Digital Inclusion Advisory Group to help accelerate closing the digital inclusion gap of First Nations peoples.[31] ACCAN continues to support the Australian Government's Indigenous Digital Inclusion Plan, which must be comprehensive, use place-based solutions, and led by First Nations peoples and community-controlled organisations.

Recommendation 9: That the Australian Government provides ongoing funding that invests in and develops local-level, place-based and co-designed solutions to support the digital inclusion of First Nations communities.

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[28] D Featherstone, *Remote Indigenous Communications Review: Telecommunications Programs and Current Needs for Remote Indigenous Communities*, ACCAN, October 2020, p. 10. https://accan.org.au/files/Reports/ACCAN_Remote%20Indigenous%20Communications%20Review_.pdf.

[29] ACCAN, *ACCAN Indigenous Steering Committee submission to the Indigenous Digital Inclusion Plan,* November 2021, p, 5 https://accan.org.au/files/Submissions/2021/ACCANper cent20ISCper cent20-per cent20Indigenousper cent20Digitalper cent20Inclusionper cent20Planper cent20submission.pdf;

[30] Ibid, see recommendation 10; The Indigenous Steering Committee also called for "investments in First Nations co-designed local solutions and dedicated funding for more digital skills training." See ACCAN, *Indigenous digital inclusion efforts must be First Nations led and adequately funded,* December 2021 https://accan.org.au/files/Mediaper cent20Releases/01.12.21per cent20-Indigenousper cent20Digitalper cent20Inclusionper cent20Effortsper cent20Mustper cent20Beper cent20Firstper cent20Nationsper cent20Ledper cent20andper cent20Adequatelyper cent20Funded.pdf.

[31] Commonwealth of Australia, Minister for Communications, *Albanese Government establishes First Nations Digital Inclusion Advisory Group,* January 2023, https://minister.infrastructure.gov.au/rowland/media-release/albanese-government-establishes-first-nations-digital-inclusion-advisory-group.

Improved accessibility

Many people with disability, continue to be digitally excluded and experience poor outcomes due to the 'prohibitive costs of digital technologies, the limitations of current technologies and a lack of digital education and training.'[32] Available, affordable and accessible communications goods and services are essential for people with disability to be able to participate equally in society. The 2023-2024 Australian Budget should support programs and initiatives aimed at increasing the accessibility of communications goods and services.

ACCAN strongly believes that access to digital communications technology is a basic human right, that enables the enjoyment of other human rights for people with disability, which are enshrined in the United Nations Convention on the Rights of Persons with Disabilities (CRPD).[33] Therefore, the Australian Government should commit to funding affordable, accessible and reliable digital communications technologies and services for people with disability.

Accessible Telecoms service

Accessible Telecoms is a free, nationwide service which provides up-to-date and independently verified information about the accessibility features of digital communication equipment and services in accessible formats, as well as training resources available to people with disability.[34] ACCAN developed and implemented the Accessible Telecoms service in 2018 with funding from a two-year National Disability Insurance Agency (NDIA) grant. To continue to provide this essential information service, an ongoing funding commitment is required. It is crucial that this service be provided with long-term funding to ensure that all people with disability have access to the communications services they want and need.

> **Recommendation 10:** That the Australian Government commits, in the 2023-2024 Australian Budget, to provide ongoing funding of the Accessible Telecoms service.

Access to online services, information and digital education

Many people with disability in Australia do not currently have equal access to online, digital or non-digital information. This creates a barrier to accessing websites, online content and services. Online information and services, especially those provided by government agencies, need to be presented in a variety of accessible formats (Auslan, Braille, Plain Language, Easy-English, different community languages). They must also be compliant with the highest Web Content Accessibility Guidelines (WCAG).

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[32] For further detail see ACCAN, *ACCAN submission to Australia's Disability Strategy 2021-2031 Guiding Principles Consultation*, November 2022, p. 4 https://accan.org.au/files/Submissions/2022/ACCANper cent20Australiasper cent202021-2031per cent20Disabilityper cent20Strategyper cent20Submissionper cent20Novper cent202022.pdf.

[33] Ibid.

[34] ACCAN, *Accessible Telecoms* https://www.accessibletelecoms.org.au/

> **Recommendation 11:** That the Australian Government allocates funding to ensure government websites are compliant with the Web Content Accessibility Guidelines (WCAG) 2.1 AA and successor standards.
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Digital capacity

For people with disability to benefit from the economic and social opportunities supported by increased digital inclusion, they must first have access to digital capacity training programs that meet their needs. The Australian Government should invest in and deliver in co-designed training and digital education programs, to build the digital capacity of people with disability, including older Australians and children with disability.

> **Recommendation 13:** That the Australian Government provides funding to deliver co-designed digital education and training programs to people with disability, including older Australians and children with disability.

Audio-description

Audio-description is an essential accessibility feature for enabling people who are blind or who have vision impairment to enjoy television. Access to free-to-air television has multiple benefits including, access to news, media and entertainment as well as the development of a national identity. The Australian Government has been providing funding to SBS and ABC to provide 14 hours of audio-description per week on their main channels from July 2020. However, inequity still exists in access to television for the blindness community with audio-description not yet available on all free-to-air commercial television.

Australian Government funding for audio description is required to ensure that people who are blind or vision impaired have equitable access to television in Australia. ACCAN urges the Australian Government to amend the *Broadcasting Services Act 1992* (Cth) to mandate that all Australian television broadcasters provide a minimum of 14 hours per week of audio described content on each of their channels.

> **Recommendation 14:** The Australian Government commits to annual funding of a minimum of 14 hours of audio-described content on all free-to-air commercial television channels, including SBS and ABC.