
Submission

6th February 2023

Director, Regional Connectivity
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

Re: Regional Connectivity Program Round 3 (including Mobile Black Spot opportunities) Grant Opportunity Draft Guidelines

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**the Department**) for the opportunity to comment on the Regional Connectivity Program Round 3 (including Mobile Black Spot opportunities) Grant Opportunity Draft Guidelines (**the draft Guidelines**).

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

The draft Guidelines are vital to improving telecommunications connectivity for regional, rural, and First Nations communities. By investing in new or upgraded telecommunications infrastructure, Round 3 of the Regional Connectivity Program (**the Program**) supports digital inclusion, strengthening regional communities' social and economic opportunities.¹ In response to the draft Guidelines, ACCAN recommends the Department should:

- Adopt a forward-looking approach to new and emerging telecommunication technologies that support enduring community benefits and equitable access.
- Include mobile coverage extension equipment.
- Promote access to 24-hours of auxiliary back-up power in isolated areas.
- Provide additional support for applicants to broker meaningful and ongoing partnerships with local communities through facilitators and resources.
- Make publicly available the Program's outcomes.

Adopt a forward-looking approach to new and emerging telecommunication technologies

ACCAN recommends the Department further clarify and expands the Program's objectives to ensure the best outcomes for consumers by using a forward-looking approach to the uptake of telecommunication technologies (as per clause 2.2). There is currently a significant amount of technological change in telecommunications occurring on a global scale, such as low-earth orbit satellites (**LEOs**) and 6G. ACCAN supports the Department's approach, which is place-based and

¹ Round 3 of the Program comprises of two funding streams: 1) Regional Connectivity Solutions (\$100 Million); and 2) Mobile Black Spot Solutions (\$50 Million): Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Regional Connectivity Program Round 3 (including Mobile Black Spot opportunity) Grant Opportunity Draft Guidelines' (2022) 6.

takes a technology neutral approach to improving connectivity in Australia. Furthermore, we suggest the Department collaborates closely and considers the outcomes of the Low Earth Orbit working group to help prioritise technological solutions that support enduring community benefits and equitable access.²

Promoting multi-Mobile Network Operators (MNOs) solutions and mobile coverage extension equipment

ACCAN supports the draft Guidelines' emphasis on developing multi-MNO approaches to Mobile Black Spot Solutions and the Department's requirement for evidence if a Proposed Solution cannot support an additional MNO (as per clause 4.2).

We are pleased that the draft Guidelines support the cost of backhaul as an eligible expense for both Mobile Black Spot Solutions and Regional Connectivity Solutions, regardless of backhaul technology (as per clause 5.3.1). In addition to the provision that the Grantee must offer backhaul access to Co-locating MNOs at a price that is more favourable than the regulated prices set under the Australian Competition and Consumer Commission Domestic Transmission Capacity Service Final Access Determination (as per clause A2).

ACCAN further recommends expanding the draft Guidelines to subsidise mobile coverage extension equipment. This approach would further support the Australian Government's *Better Connectivity Plan for Regional and Rural Australia* by maximising investment and enabling further connectivity in areas of high risk of natural disasters.³

Access to 24-hours of auxiliary back-up power in isolated areas

ACCAN recommends that communities in remote and isolated regions prone to natural disasters should have access to 24-hours auxiliary back-up power. As reflected in previous ACCAN submissions on improving mobile coverage, during natural disasters, energy services may require longer than 12-hours to gain access to isolated sites. To further support communities in rural and remote regions, ACCAN recommends that 24-hours of auxiliary back-up power should be available for isolated areas.⁴

To support access to 24-hours of auxiliary back-up power in isolated areas, ACCAN further recommends the draft Guidelines include provisions for the use of Stand Alone Power Systems for communities in remote and very remote Australia.⁵ These recommendations would enable the achievement of the Australian Government's commitment to natural disaster resilience discussed during the Kimberley region's record-breaking floods of January 2023.⁶

² Minister Michelle Rowland, 'Address to RadComms 2022 Conference'. (Speech, RadComms 2022, 15 November 2022).

³ See Australian Communications Consumer Action Network (ACCAN), 'ACCAN submission to Regional Telecommunications Review 2021'. (Regional Telecommunications Independent Review Committee, 2021) 19; ACCAN, 'ACCAN submission Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines'. (Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2022) 1-2.

⁴ See ACCAN, 'ACCAN submission Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines'. (Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2022) 2.

⁵ Ibid 2.

⁶ See Prime Minister of Australia, 'Disaster Assistance for Kimberley Shire's Affected by Record-Breaking Flooding'. (Media Release, 9 January 2023).

Support to broker meaningful and ongoing partnerships with local communities

ACCAN supports the draft Guidelines' emphasis on developing place-based solutions to regional digital connectivity issues as part of the Program (as per clause 2.2). We recommend that the draft Guidelines provide specific funding for a facilitator to help work with the local community on providing evidence around a Proposed Solution's social and economic benefits (as per clause 2.2.2). Facilitators should be from the local community for Proposed Solutions in First Nations communities to assist with brokering meaningful and ongoing partnerships with the Department.

Make publicly available the Program's outcomes

ACCAN further recommends the Department publish information on the success rate of the Program. This recommendation aligns with the *Commonwealth Grant Rules and Guidelines'* key principles of transparency and accountability by strengthening public confidence in the Program.⁷ Furthermore, we suggest the Department provide written reasons for the Program's outcomes to support unsuccessful communities in making informed decisions on future applications.⁸ As previously noted in ACCAN's submission to the Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines:

Communities that the Department ranks low priority may therefore choose to redirect their efforts and limited resources towards alternative options, such as the Regional Connectivity Program (RCP), instead of re-submitting funding applications. Alternatively, communities who just missed out or failed to be considered [...] due to technical reasons may see value in advocating for their community to be included in future [Programs].⁹

We thank the Department for the opportunity to comment on the draft Guidelines. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at amelia.radke@accan.org.au.

Yours sincerely,

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Senior Policy Adviser

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.

⁷ See ACCAN, 'ACCAN submission Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines'. (Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2022) 2-3.

⁸ Ibid 3.

⁹ Ibid 3.