



Ms Deena Shiff
Chair
Australian Broadband Advisory Council (ABAC)

By email: ABAC@communications.gov.au

Dear Ms Shiff

RE: Feedback on *Riding the Digital Wave: Report on COVID-19 Trends and Forward Work Program*

ACCAN thanks the Australian Broadband Advisory Council (ABAC) for the opportunity to provide comments on its recent publication, *Riding the Digital Wave: Report on COVID-19 Trends and Forward Work Program*.

ACCAN strongly supports the work of the ABAC in considering the impact of COVID-19 on internet use by Australian consumers and businesses, and exploring how connectivity can be leveraged to deliver broad and long-term benefits to the Australian economic context.

Based on our learnings from the COVID-19 pandemic, our comments focus on the areas that must not be overlooked when considering the future of broadband in Australia, especially in relation to economic recovery and renewal. The 2019 Australian Infrastructure Audit highlights the centrality of phone and internet services to Australians' lives, and describes the need to improve access and uptake of these services by digitally disadvantaged groups.¹ We understand that the ABAC's Forward Work Program will examine digital skills pathways, affordability and opportunities in education in the coming quarters; however, we feel it is important to acknowledge and raise the needs of digitally disadvantaged individuals at this early stage, so that their interests are fully taken into consideration across future work areas.

¹ Infrastructure Australia 2019, *Australian Infrastructure Audit – Telecommunications*, <https://www.infrastructureaustralia.gov.au/australian-infrastructure-audit-2019-telecommunications>

Australian Communications Consumer Action Network (ACCAN)
Australia's peak body representing communications consumers

List of recommendations

- **Recommendation 1:** The ABAC should consider essential small business supports when planning for the future digitisation of business sectors, especially those based in the regions like agriculture.
- **Recommendation 2:** When looking into telecommunications affordability, we encourage the ABAC to examine the effectiveness of NBN Co's COVID-19 assistance packages, the nature and challenges of the wholesaler-retailer relationship, and the need for an affordable home broadband product for households on limited incomes as advocated by ACCAN and the 2020 Australian Digital Inclusion Index report.
- **Recommendation 3:** The ABAC's Q1 and post-Q1 2021 work program must address the need for a consistent and well-established approach to devices and internet services for online learning, in order to effectively address and respond to the digitisation of education.
- **Recommendation 4:** The ABAC should extend its focus on digital skills beyond SME and tertiary sectors to include emphasis on the needs of recently-arrived migrants and CALD communities.
- **Recommendation 5:** The ABAC should consider the need for an online information service to assist in reducing persistent information asymmetries experienced by communications consumers, and to promote better choice of market offers.
- **Recommendation 6:** The ABAC should consider strategies to support digital participation in remote Indigenous communities to ensure that these communities do not miss out on the economic benefits associated with full connectivity.

Essential supports for small businesses

The COVID-19 pandemic poses unprecedented challenges to Australian small businesses, the impacts of which continue to be felt across Australian communities. Business NSW's December 2020 Telecommunications Survey reported that service speeds and reliability remain the primary concern for NSW businesses, and that a lack of publicity and business owners' competing priorities meant that any telecommunications support that became available to them during the pandemic has been under-utilised.² In fact, in an October survey of small to medium sized enterprises (SMEs), ACCAN found that a third of respondents were not aware that financial hardship assistance was available to them from their telco provider.³

² Business NSW 2020, *Telecommunications Survey*, <https://www.businessnsw.com/content/dam/nswbc/businessnsw/pdf/Telecommunications%20Survey;%20December%202020.pdf>

³ ACCAN 2020, *Telco service essential to small business*, media release, <https://accan.org.au/media-centre/hot-issues/1819-telco-service-essential-to-small-business>

Through consultation with our members and Small Business Advisory Forum, ACCAN has identified the following priorities to ameliorate the impact of COVID-19 on small business' communications, and ensure they get the most of their essential phone and internet connections:

- Extending financial hardship relief measures by NBN Co and telecommunications retailers,
- Reviewing and strengthening the Telecommunications Hardship Principles, which are an agreement between the Australian Government and the telco industry to provide additional support to customers during the COVID-19 pandemic,
- A slow, staged, transition as NBN's 40 per cent CVC boost is withdrawn,⁴
- Funding to support small businesses' digital transformation,
- Implementation of arrangements to support greater network reliability, including wholesale level service standards,
- Improved information resources to guide better service choice,
- Consideration of an automatically applied small business internet subsidy.

ACCAN understands that the NBN COVID-19 small business support package⁵ announced in April has not been taken up by RSPs. Opportunities to improve the wholesaler-retailer relationship must be addressed to ensure that wholesale benefits such as this are passed on to the community. We acknowledge the operational challenges faced by RSPs at the onset of the COVID-19 pandemic; however, ACCAN is disappointed that the small business community has not been able to access NBN's offers over the past 9 months.

Recommendation 1: The ABAC should consider essential small business supports when planning for the future digitisation of business sectors, especially those based in the regions like agriculture.

Affordability and access to devices and services

We are pleased to see that digital inclusion and affordability is of particular interest to the ABAC, and that it plans to investigate a co-ordinated mechanism to assist vulnerable groups become digitally included. It is important to note that the COVID-19 has not created new challenges in the realm of affordability and access; rather, it has exposed and aggravated the severity of an existing digital divide.

ACCAN has developed an affordable broadband proposal to ensure that *No Australian is Left Offline*.⁶ ACCAN is calling for the introduction of a 50 Mbps unlimited broadband service offered at a wholesale price of \$20 per month by NBN Co to households receiving government financial support.

⁴ The CVC, or Connectivity Virtual Circuit, is the amount bandwidth purchased by a retail service provider. NBN Co announced it would allocate additional CVC to providers to assist them cope with heavy traffic due to increasing numbers of people working from home.

⁵ NBNCo 2020, *NBN Co creates \$150 million COVID-19 relief and assistance package*, media release, <https://www.nbnco.com.au/corporate-information/media-centre/media-statements/nbn-co-creates-covid-19-relief-and-assistance-package>

⁶ ACCAN 2019, *No Australian Left Offline*, <http://accan.org.au/no-australian-left-offline>

Under this arrangement, eligible households would pay approximately \$30 per month for unlimited broadband – almost halving the current average cost.

At the onset of the COVID-19 pandemic, ACCAN was pleased to see NBN Co's \$150m suite of support packages, which included an NBN Education Assistance package that waived new NBN connection charges for households with school-aged children,⁷ and residential and small business financial hardship packages to support customers in financial stress during the pandemic.⁸

However, there were challenges in the delivery of these support packages due to:

- Low publicity of the offers from some RSPs,
- Other RSPs' failure to take up the offers,
- Inconsistent or complex eligibility criteria which created some confusion for consumers and RSPs.

Feedback received by ACCAN through community sector roundtables suggested that the short-term nature of the Education Assistance Package would be a likely disincentive for households in financial stress to take it up, due to uncertainty surrounding the offer's end date. Another factor has been the cost of modems, which involved a significant upfront investment for households on low fixed incomes, and represented a cost barrier. Initiatives such as those offered by WorkVentures⁹ in upgrading and remodelling used modems should be brought into the mix to help overcome this problem in future targeted programs.

As indicated in the previous section, challenges in the wholesaler-retailer relationship have undermined the effectiveness of NBN Co's support measures. ACCAN was especially disappointed that on the whole, RSPs did not appear to take up NBN Co's financial hardship assistance.

Recommendation 2: When looking into telecommunications affordability, we encourage the ABAC to examine the effectiveness of NBN Co's COVID-19 assistance packages, the nature and challenges of the wholesaler-retailer relationship, and the need for an affordable home broadband product for households on limited incomes as advocated by ACCAN and the 2020 Australian Digital Inclusion Index report.¹⁰

The challenge of telecommunications affordability extends to access to devices, especially for school-aged children. While the efforts of the telco industry, governments and schools to keep students connected are commendable, over the past year ACCAN has received extensive feedback from local community workers and educators regarding the significant volumes of students who did not have access to devices during the learning-from-home period, due to cost barriers.

⁷ NBN Co 2020, *COVID-19 Education Assistance Package*, <https://www.nbnco.com.au/campaigns/covid-19/education-assistance-package>

⁸ NBN Co 2020, *Our response to COVID-19*, <https://www.nbnco.com.au/campaigns/covid-19>

⁹ <https://workventures.com.au/>

¹⁰ Thomas et al 2020, *Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2020*, RMIT and Swinburne University of Technology, for Telstra, https://digitalinclusionindex.org.au/wp-content/uploads/2020/10/TLS_ADII_Report-2020_WebU.pdf, p. 46

After undertaking desktop research, ACCAN found that there is a highly inconsistent approach across states and territories regarding provision of devices and internet services to students in need of them.¹¹ For example, NSW and Victoria have established device loan programs in place, where schools are able to order subsidised computer equipment. Other states like WA and NT do not, meaning that students in those states who required devices or an internet connection have had to rely on their school for support. ACCAN has advocated to the Minister for Communications, and the Department of Infrastructure, Transport, Regional Development and Communications, for a work program to co-ordinate a national strategy on access to devices and internet services in the context of online learning.

Recommendation 3: The ABAC's Q1 and post-Q1 2021 work program must address the need for a consistent and well-established approach to devices and internet services for online learning, in order to effectively address and respond to the digitisation of education.

Digital capability and informed consumer decision-making

ACCAN supports the Government's funding initiatives for digital skills training and recognises its important commitment to the work of the Digital Skills Organisation and also to Be Connected,¹² focusing on capacity building for older Australians.

We have concerns about the narrow scope of ABAC's approach to digital skills, which primarily focuses on tertiary learning and SMEs. ACCAN routinely receives feedback from its members about the dire and urgent need for digital skills support for newly-arrived migrants and people from culturally and linguistically diverse (CALD) communities, groups that are largely overlooked in current government programs for digital skills training. Local community organisations generally take on the role of digital mentors for clients as best they can, though they are rarely resourced to do so. It is important to note that the economic benefits driven by digital skills are not limited to specific sectors or groups – the more people that are able to use ICT with confidence, the greater the net economic benefit.¹³

Recommendation 4: The ABAC should extend its focus on digital skills beyond SME and tertiary sectors to include emphasis on the needs of recently-arrived migrants and CALD communities.

While digital skills are exceedingly important for meaningful use of digital technologies, consumers – both residential and small business – must be able to understand the services they receive and make informed and appropriate decisions when choosing internet services. This is fundamental to a

¹¹ ACCAN 2020, *Online Learning and Access to Devices*, <https://accan.org.au/media-centre/covid19-telco-services-and-technology/1708-covid-19-supporting-families-and-households#OnlineLearning>

¹² <https://beconnected.esafety.gov.au/>

¹³ Deloitte Access Economics 2015, *Digital government transformation*, <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-economics-digital-governmenttransformation-230715.pdf>

consumer receiving the services that are suitable to their usage and needs so they can effectively access the Internet.

There is extensive evidence of the information asymmetries that exist between telco customers and their retail provided; these are detailed in our submission to Consumer Safeguards Review Part C: Choice and Fairness.¹⁴ To help overcome this problem, there is a need for an unbiased and independent information and plan comparison tool for phone and internet products and services, similar to *Energy Made Easy* in the energy sector.¹⁵

Recommendation 5: The ABAC should consider the need for an online information service to assist in reducing persistent information asymmetries experienced by communications consumers, and promote better choice of market offers.

Remote Indigenous communications

ACCAN is deeply concerned that remote Indigenous communities (RICS) are being left behind when it comes to investment in telecommunications infrastructure and last-mile access.¹⁶ As some of the most deeply disadvantaged parts of Australia, the true extent of digital exclusion facing RICs is unclear due to significant data and knowledge gaps, and a patchwork of piecemeal policy responses from successive state, territory and Federal governments.

ACCAN commissioned the *Remote Indigenous Communications Review*, which found that there are pervasive and complex barriers that prevent many Indigenous people living in RICs from full or even partial digital engagement.¹⁷ These barriers include:

- Last-mile delivery to enable household or individual access,
- Affordability of services,
- Improved quality and reliability of services,
- Demand for increased broadband speeds and data limits, especially to enable use of streaming services and high-bandwidth applications,
- Providing community access facilities for those without personal devices,
- Timely technical support and effective response times for installation and repair of equipment,
- Appropriate IT systems to address congestion and latency for remote servers and two-way high bandwidth applications such as telehealth,
- Digital skills and cyber-security issues,

¹⁴ ACCAN 2020, ACCAN response to Consumer Safeguards Review Part C / Choice and Fairness, <https://accan.org.au/files/Submissions/2020/ACCAN%20Submission%20to%20Consumer%20Safeguards%20Review%20Part%20C%20V.1.1.pdf>

¹⁵ <https://www.energymadeeasy.gov.au/>

¹⁶ Last-mile access involves the infrastructure in and around a premises that is needed to physically connect an internet user.

¹⁷ Featherstone D 2020, *Remote Indigenous Communications Review: Telecommunications Programs and Current Needs for Remote Indigenous Communities*, for ACCAN, <https://accan.org.au/our-work/research/1821-remote-indigenous-communications-review-telecommunications-programs-and-current-needs-for-remote-indigenous-communities>

- Accessibility of online services for people with limited English/text literacy or disabilities, and
- Cultural and contextual awareness of service providers working with remote communities.

Recommendation 6: The ABAC should consider strategies to support digital participation in remote Indigenous communities to ensure that these communities do not miss out on the economic benefits associated with full connectivity.

Closing comments

The ABAC has been tasked with exploring and promoting the ways in which high-speed broadband networks can lift Australia's economic productivity and the welfare of its people, and supporting Australians to adopt connectivity.^{18 19} Essential to this task is addressing the many barriers that prevent digital participation and curb the potential economic benefits of connectivity. ACCAN believes that by incorporating our recommendations, the ABAC's Future Work Program will effectively support increased digital participation and enhance economic output through the COVID-19 recovery and beyond.

Please get in touch on 02 9288 4000 or at Rebekah.Sarkoezy@accan.org.au if you wish to discuss our feedback further with us.

Sincerely,

Rebekah Sarkoezy
Policy Officer

¹⁸ Department of Infrastructure, Transport, Regional Development and Communications 2020, *Australian Broadband Advisory Council*, <https://www.communications.gov.au/what-we-do/internet/australian-broadband-advisory-council>;

¹⁹ Australian Broadband Advisory Council 2020, *Riding The Digital Wave: Report on COVID-19 Trends and Forward Work Program*, <https://www.communications.gov.au/documents/riding-digital-wave-report-covid-19-trends-and-forward-work-program>