

Submission

27 July 2023

Department of Infrastructure, Transport, Regional Development, Communications and the Arts
Via email: PUMP@infrastructure.gov.au.

Re: Consultation on PUMP Round 2 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 Peri-Urban Mobile Program (**PUMP**) Round 2 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.

ACCAN supports the PUMP as integral to improving Australia's telecommunications infrastructure and mitigating the impact of natural disasters on peri-urban communities. To further strengthen the draft guidelines, ACCAN recommends the Department:

- Amend clause 3.4.3 to make it mandatory to recognise the in-kind funding co-contributions of third parties.
- Promote a data-driven approach to site selection through service reliability.
- Publish the PUMP outcomes, including successful locations, community benefit, and the success rate of the initiative.

Third party funding in-kind co-contributions

ACCAN recommends amending the optional requirement to recognise third party funding in-kind co-contributions as part of clause 3.4.3. As previously noted in ACCAN's submission to Round 1 of the Peri-Urban Mobile Programs draft guidelines:

If this requirement remains optional, it may create an opportunity for the applicant to be eligible for funding, including the value of the in-kind contribution, where the applicant is able to retain the difference in value.¹

Ensuring this requirement is made mandatory creates accountability and support transparency in the PUMP regarding the relationship between the third party and the applicant.

¹ ACCAN, 'Consultation on the Peri-Urban Mobile Program – Grant Opportunity Guidelines'. (Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2021). 1. Available at: <https://accan.org.au/accans-work/submissions/1912-pump-consultation>.

Promote a data-driven approach to site selection through service reliability

ACCAN suggests the Department develops a data-driven approach to better support the selection of sites as part of the PUMP. We suggest the draft guidelines request applicants to provide service reliability data to inform an assessment of the relative merits of individual projects. This would align the telecommunications sector with the approach of other essential services, such as the Energy sector, which draws on the System Average Interruption Frequency Index (**SAIFI**) and the System Average Interruption Duration Index (**SAIDI**) to undertake a system wide approach to assessing reliability.² A data-driven approach to the PUMP will further support transparency in how the Department is building the economic and core resilience of Australia's telecommunications infrastructure.

Make the PUMP's outcomes publicly available

To further support the PUMP's alignment with the *Commonwealth Grant Rules and Guidelines'* key principles of accountability and transparency, ACCAN recommends the Department make the outcomes publicly available.³ In particular, ACCAN suggests the Department publishes a summary report that includes information on successful locations, how communities will directly benefit from the PUMP, and the success rate of the initiative. Making the PUMP outcomes available will further strengthen public confidence in the Department.⁴

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,

Dr Amelia Radke
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.

ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP](#)

² See ACCAN, 'ACCAN submission to Mobile Network Hardening Program Round 2 Draft Grant Opportunity Guidelines'. (Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2023) 2. Available at: <https://accan.org.au/accans-work/submissions/2138-mobile-hardening-network-program>.

³ 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. Available at: <https://accan.org.au/accans-work/submissions/2041-mbsp-grant-opportunity-guidelines>.

⁴ Ibid 3.