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**Submission**

**25 January 2024**

## Pre-Budget Submission 2024-2025

Submission by the Australian Communications Consumer Action  
Network (ACCAN) to the Australian Treasury

**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

ACCAN thanks the Treasury for the opportunity to submit to the pre-budget consultation and provide our views on the priorities for the 2024-2025 Federal Budget. ACCAN's response to this consultation is structured around our 2023-24 policy priorities which have been developed in close consultation with our members and our understanding of the needs of communications consumers around Australia.<sup>1</sup>

Communications consumers face a number of barriers to accessing affordable, quality and reliable connectivity. For many Australians, including First Nations telecommunications consumers living in regional, rural, and remote areas, telecommunications connectivity continues to be a daily challenge. Some Australians are having difficulties affording and accessing internet devices and are finding it difficult to repair their devices when they break. Australian telecommunications consumers should be facilitated to engage in a fair and competitive telecommunications market which caters to their needs.

Our submission calls on the Federal Government to address these issues in the 2024-2025 Australian Budget by:

- Allocating funding to establishing a concessional broadband service to improve the affordability of NBN services for consumers receiving government assistance.
- Allocating funding to establish an independent comparison tool for the telecommunications market to assist consumers in finding a more affordable telecommunications service.
- Establishing a formalized pathway to ensure that internet devices are refurbished and passed down to consumers through community groups, assisting low-income consumers in obtaining internet devices.
- Establishing a legislated right to repair to facilitate the competitiveness of the internet device repair market, allowing consumers to access affordable, local, and timely repair solutions for the internet devices they use daily.
- Continuing the funding of the Mobile Black Spot Program and Regional Connectivity Program to assist consumers, including First Nations consumers, to gain suitable telecommunications connectivity.
- Allocating funding to support consumer representation in digital platforms policy.
- Allocating funding to improve access to accessible telecommunications goods and services to ensure that people with disability are able to equally participate in society.

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<sup>1</sup> ACCAN. 2023. *Policy Priorities 2023-2024*. Available at: <https://accan.org.au/accans-work/policy-positions/2171-policy-priorities-2023-24>.

## List of Recommendations

**Recommendation 1:** That the Federal Government allocates funding to NBN Co to offer a broadband concession service to households receiving Commonwealth financial support.

**Recommendation 2:** That the Federal Government invests in a trusted, independent online plan comparison tool for phone and internet services, to give greater choice to consumers. Existing government comparison tools should be analysed to establish the most effective methods to develop, fund and promote the IPCT.

**Recommendation 3:** That the Federal Government funds and allocates accessible and affordable devices to people on low incomes without consistent access to internet devices. This should take the form of a formalised pathway which ensures that large purchasers of internet devices cooperate with government to achieve this aim.

**Recommendation 4:** That the Federal Government and telecommunications providers take steps to address the device availability and repairability concerns of consumers in First Nations communities, noting the criticality of internet device access and connectivity in these communities.

**Recommendation 5:** That the Federal Government should allocate funding to establish a legislated right to repair following the recommendations of the Productivity Commission's inquiry report into the right to repair.

**Recommendation 6:** That the Federal Government should allocate funding to establish an independent device repairability index following Recommendation 6.1 of the Productivity Commission's inquiry report into the right to repair. This independently reviewed index would provide consumers with valuable product information to inform their purchasing decisions.

**Recommendation 7:** That the Federal Government should allocate funding to provide an affordable voice concession service to support Age Pension and Disability Support Pension recipients to access home phone services.

**Recommendation 8:** That the Federal Government continue funding the Mobile Black Spot Program and Regional Connectivity Program to assist in improving Australia's connectivity outcomes in line with its Better Connectivity Plan for Rural and Regional Australia.

**Recommendation 9:** That the Federal Government should take account the recommendations of the First Nations Digital Inclusion Advisory Group's initial report, especially regarding the ability of First Nations communities to interact with existing government grant programs.

**Recommendation 10:** That the Federal Government should act on the recommendations of the First Nations Digital Advisory Group's initial report and ensure genuine engagement and collaboration with First Nations people and communities.

**Recommendation 11:** That the Federal Government should allocate funding to undertake further research to determine the effectiveness of satellite phone

communications, in particular LEOSats as a form of communications redundancy during natural disasters.

**Recommendation 12:** That the Federal Government re-establishes the Communications Fund with a mandate to invest its assets commercially and uses the proceedings for funding essential communications programs.

**Recommendation 13:** That the Federal Government invest in initiatives aimed at improving broadband reliability, including prioritising progress on the draft standards, rules, and benchmarks for Statutory Infrastructure Providers.

**Recommendation 14:** That the Federal Government allocates funding from general revenue for the ACMA to investigate and monitor mobile outages and the reliability of mobile infrastructure across Australia, to identify if measures are needed to increase mobile reliability.

**Recommendation 15:** That the Federal 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 16:** That the Federal Government allocates funding to the Mobile Black Spot Program to promote access to 24-hours of auxiliary back-up power in isolated areas and provide additional support to enable local communities to broker partnerships through facilitators and resources.

**Recommendation 17:** That the Federal Government should establish clear communications guidelines for telecommunications companies to follow in response to unplanned outages.

**Recommendation 18:** Accept the recommendations made by the inquiry into co-investment in multi-carrier regional mobile infrastructure to improve telecommunications connectivity and reliability.

**Recommendation 19:** That the Federal Government immediately consider what steps may facilitate the adoption of 'Next Generation Triple Zero' services, including direct text to Triple Zero, as well as guaranteed NRS access to the emergency call service.

**Recommendation 20:** That the Federal Government allocate funding to support consumer representation in digital platforms policy.

**Recommendation 21:** That the DITRDCA develop a long-term funding arrangement for the Accessible Telecoms service to reflect the digital transformation strategies of State and Federal Governments.

**Recommendation 22:** That the Federal Government allocates funding to ensure government websites are compliant with the Web Content Accessibility Guidelines (WCAG) 2.1 AA and successor standards.

**Recommendation 23:** That the Federal 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 24:** That the Federal Government allocate funding towards the development of a national plan to promote accessible information and communications.

**Recommendation 25:** That the Federal 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 26:** The Federal 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 the ABC.

# Telecommunications Affordability and Digital Inclusion

## The state of telecommunications affordability in Australia

Affordable communications products and services remain a challenge for many Australian consumers. Research by the Department of Transport, Regional Development, Communications and the Arts (**DITRDCA**) found ‘a higher spend on telecommunications relative to their disposable income in households where members: work from home, are financially stressed, are younger or middle-aged, where children are present, or if the household is located either in a rural area, or in a more prosperous area’.<sup>2</sup> Additionally, the Australian Competition and Consumer Commission (**ACCC**) noted broad price increases in medium and premium NBN services in the 2022-2023 period.<sup>3</sup> ACCAN research indicated that ‘26% of consumers did not find phone and internet costs affordable’.<sup>4</sup> ACCAN’s affordability research noted that:

- 20% of consumers missed phone and internet bill payments because they couldn’t afford it.<sup>5</sup>
- 22% of consumers paid a bill late because they couldn’t afford it.<sup>6</sup>
- 21% of consumers went without other essentials such as food or medicine to pay a phone and internet bill.<sup>7</sup>
- 20% of consumers used their phone and/or internet less than they needed to help save money.<sup>8</sup>

The 2023 Australian Digital Inclusion Index (**ADII**) indicated that ‘while affordability has improved at a national level, some groups continue to experience high levels of affordability stress’.<sup>9</sup> The ADII noted that:

- ‘4.3% of Australians would need to pay more than 10% of their household income to gain quality, uninterrupted connectivity’.<sup>10</sup>
- ‘27.6% of Australians experience affordability stress, meaning that accessing a quality internet connection and necessary devices would compromise their capacity to pay for other essential household items’.<sup>11</sup>

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<sup>2</sup> DITRDCA. 2023. *Australian households and the affordability of telecommunications*. p.5. Available at: <https://www.infrastructure.gov.au/sites/default/files/documents/australian-households-affordability-telecommunications-evidence-household-income-labour-dynamics-australia-hilda-data-working-paper-november2023.pdf>.

<sup>3</sup> ACCC. 2023. *Communications Market Report 2022-2023*. viii. Available at: <https://www.accc.gov.au/about-us/publications/serial-publications/accc-communications-market-report/accc-communications-market-report-2022-23>.

<sup>4</sup> ACCAN. 2023. *ACCAN 2023 Affordability Snapshot*. p.1. Available at: <https://accan.org.au/accans-work/research/2251-affordability-snapshot-2023>.

<sup>5</sup> Ibid p.2.

<sup>6</sup> Ibid p.2.

<sup>7</sup> Ibid p.2.

<sup>8</sup> Ibid p.2.

<sup>9</sup> Australia Digital Inclusion Index. 2023. *Australian Digital Inclusion Index 2023*. p.19. 2023. Available at: <https://www.digitalinclusionindex.org.au/digital-inclusion-the-australian-context-in-2023/>.

<sup>10</sup> Ibid.

<sup>11</sup> Ibid.



- ‘All Australians in the lowest income quintile, and 48.3% of those in the second lowest, would have to pay more than 5% of their household income to gain quality, uninterrupted connectivity’.<sup>12</sup>

Critically, the ADII noted the impacts of the cost of telecommunications products and services on internet access and use. These include:

- ‘18.6% of First Nations respondents reported cost as a reason for limiting internet use, compared to 5.7% of other Australians’.<sup>13</sup>
- ‘15.3% of unemployed respondents reported the cost of internet access as inhibiting use, compared to 4.9% of employed respondents’.<sup>14</sup>
- ‘27.1% of respondents in very remote areas reported the cost of internet access as inhibiting use, compared with 5.7% of respondents in major cities, 4.2% in inner regional Australia, 11.7% in outer regional Australia, and 7.1% in remote Australia’.<sup>15</sup>

Some consumer cohorts are particularly sensitive to affordability stress including consumers living with a disability, living in public housing and currently unemployed.<sup>16</sup> Addressing telecommunications affordability is critical for improving the uptake of telecommunications services and the benefits associated with quality telecommunications connectivity.

To this end, ACCAN supports the extension of the School Student Broadband Initiative until 31 December 2024 and the extension of the duration of free services to 31 December 2025.<sup>17</sup> We maintain that, in accordance with telecommunications’ status as an essential service, additional measures should be considered by the Treasury to assist telecommunications consumers in accessing affordable and reliable connectivity.

## Affordable broadband – Establishing a concessional service for vulnerable consumers

A broadband connection can be transformative. Consumers accessing affordable broadband experience significant economic and social benefits, enabling them to increase their average income, create new employment opportunities and more effectively engage with their communities.<sup>18</sup> Ensuring that an essential service is accompanied by the provision of a subsidised, concessional service for its most vulnerable users is essential to ensuring equitable service access and improving the utilisation of the service.

ACCAN’s priority for this space has centred around our ‘No Australian Left Offline’ policy position, which aims to ensure that all Australians, especially those experiencing vulnerability, are able to

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<sup>12</sup> Australia Digital Inclusion Index. 2023. *Australian Digital Inclusion Index 2023*. p.19. 2023. Available at: <https://www.digitalinclusionindex.org.au/digital-inclusion-the-australian-context-in-2023/>.

<sup>13</sup> Ibid. p.20.

<sup>14</sup> Ibid.

<sup>15</sup> Ibid.

<sup>16</sup> Ibid.

<sup>17</sup> DITRDCA. 2023. *School Student Broadband Initiative (SSBI)*. Available at: <https://www.infrastructure.gov.au/media-communications-arts/internet/national-broadband-network/school-student-broadband-initiative-ssbi>.

<sup>18</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.8. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.

access an affordable home broadband internet service.<sup>19</sup> Offering a concessional broadband service at a wholesale level will enable retail service providers to make competitive offerings available to low-income consumers and improve consumers' ability to shop around for the best offer to suit their needs.<sup>20</sup> This proposed service could provide support for up to two million households, including consumers who are living in public housing, seniors, and those receiving government assistance.<sup>21</sup>

ACCAN considers that providing this concessional service will enable consumers to access the NBN without putting themselves into financial hardship. A concessional broadband service has the potential to place downward pressure on the communications costs faced by low-income households by promoting competition among network providers. Moreover, the introduction of a concessional service is likely to be an effective way to increase the earning capacity of low-income and vulnerable groups with low-inflationary impact.

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

## An Independent Plan Comparison Tool may assist in improving value for money

Despite the competitive nature of the Australian telecommunications market, many consumers face information asymmetries when searching for the right telecommunications plans to suit their needs. This has the effect of consumers being unaware of the products and services offered by some providers in the telecommunications market, leading to some consumers having difficulty finding telecommunications products to suit their needs and paying more than they otherwise would were they informed.

Consumers overwhelmingly agree that it should be easier to find and compare information about phone and internet plans.<sup>22</sup> Research by Finder noted that 'consumers are most commonly motivated by price when it comes to switching providers'.<sup>23</sup> Additionally, 50 percent of Australians surveyed had not switched their telecommunications provider in the last 5 years with almost 68 percent of consumers surveyed not having switched their provider in the last 3 years.<sup>24</sup> The ACCC's 2023 internet activity report noted that consumers are currently using on average, 24.4GB of mobile data per month.<sup>25</sup> This demonstrates that many consumers may benefit from a more effective search tool to assist them in changing telecommunications providers, improving their own consumer outcomes and promoting greater competition within the market.

<sup>19</sup> ACCAN. *No Australian Left Offline*. Available at: <https://accan.org.au/accans-work/no-australian-left-offline>.

<sup>20</sup> ACCAN. 2022. *Independent Plan Comparison Tool Policy Position*. Available at: <https://accan.org.au/accans-work/policy-positions/2123-independent-plan-comparison-tool>.

<sup>21</sup> ACCAN. *No Australian Left Offline*. Available at: <https://accan.org.au/accans-work/no-australian-left-offline>.

<sup>22</sup> ACCAN. 2022. *Independent Plan Comparison Tool Policy Position*. p.1. Available at: <https://accan.org.au/accans-work/policy-positions/2123-independent-plan-comparison-tool>.

<sup>23</sup> Finder. 2021. *Finder- Submission in response to: Consumer Data Right Sectoral Assessment: Telecommunications*. p.6. Available at: <https://treasury.gov.au/sites/default/files/2021-11/c2021-198050-tc-finder.pdf>.

<sup>24</sup> ETFM. 2022. *Unhappy Optus customers ditching the telco as eftm survey shows we're all paying for too much data*. Available at: <https://eftm.com/2022/10/unhappy-optus-customers-ditching-the-telco-as-eftm-survey-shows-were-all-paying-for-too-much-data-229055>.

<sup>25</sup> WhistleOut. 2023. *How much mobile and internet data do you need?*. Available at: <https://www.whistleout.com.au/MobilePhones/Guides/Mobile-broadband-usage-guide#:~:text=lf%20we%20add%20mobile%20data,we%20have%20to%20think%20about>.

Existing private comparison tools do not necessarily put consumers' interests first and may:

- Present consumers with incomplete information on the options available to them.
- Have hidden commercial relationships with the providers they list on their site.
- Provide limited or no information on accessible options for people with disability.<sup>26</sup>

Therefore, consumers would better benefit from a more independent source of information to assist them in switching to a cheaper telecommunications provider which may better suit their needs.

In response to these factors and the affordability barriers experienced by telecommunications consumers noted above, the Federal Government should develop an independent plan comparison tool (**IPCT**) for the telecommunications sector. An IPCT would provide several benefits, including:

- Providing unbiased prominence to offers in the market.
- Allowing consumers to place greater trust in the tool's operation.
- Reducing the search costs and information asymmetries faced by consumers.
- Promoting competition by reducing barriers to entry and enhancing the discoverability of smaller providers.<sup>27</sup>

Carriage Service Providers are required to provide consumers with a free summary of each of their offers upon request through a Critical Information Summary (**CIS**). However, this information is not in a format that is readily comparable for consumers. Existing CIS documentation or Consumer Data Right product information could be standardised and uploaded to the IPCT.<sup>28</sup> An example of this approach is the Australian Energy Regulator pricing guidelines, which is used by Energy Made Easy (**EME**) and could be adapted to the telecommunications sector. In the energy sector, providers submit data to EME which accompanies their energy plans on the market.<sup>29</sup>

Since 2021, EME has facilitated approximately 1 million website searches per year and more than 60,000 consumers per year have switched their energy retailer after having completed a search using EME.<sup>30</sup> Should an IPCT be developed and resourced to an appropriate extent compared to EME, many consumers will be facilitated to make savings on their telecommunications bills.<sup>31</sup>

An IPCT would help reduce existing information asymmetries by empowering consumers with reliable and impartial information about which plan would best suit their needs. It would encourage consumers to more frequently change providers, preventing the build-up of incumbency bias and rewarding providers who compete on price. It would offer consumers an effective way to reduce the

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<sup>26</sup> ACCAN. 2022. *Independent Plan Comparison Tool Policy Position*. p.1. Available at: <https://accan.org.au/accans-work/policy-positions/2123-independent-plan-comparison-tool>.

<sup>27</sup> Ibid. p.2.

<sup>28</sup> Ibid.

<sup>29</sup> Ibid.

<sup>30</sup> AER. 2022. *ACCC and AER Annual Report 2021-2022*. p.3. Available at: <https://www.accc.gov.au/about-us/publications/accc-and-aer-annual-report/accc-and-aer-annual-report-2021-22>. AER. 2023. *ACCC and AER Annual Report 2022-2023*. p.3. Available at: <https://www.aer.gov.au/documents/accc-and-aer-annual-report-2022-23>.

<sup>31</sup> A consumer switching a largely equivalent telecommunications service from a larger market participant to a smaller market participant (assuming an average data usage of 24.4GB per month) may save approximately 200 dollars per year on mobile data bills and approximately 150 dollars per year on NBN or equivalent broadband services. These potential savings are material to consumers who are currently experiencing a cost-of-living crisis.

cost of telecommunications plans, encourage service providers to offer more affordable plans, and help reduce inflationary pressures by lowering the economic costs of connectivity.

**Recommendation 2:** That the Federal Government invests in a trusted, independent online plan comparison tool for phone and internet services, to give greater choice to consumers. Existing government comparison tools should be analysed to establish the most effective methods to develop, fund and promote the IPCT.

## Affordable internet device access is critical to ensuring quality connectivity

Many consumer and community stakeholders have noted that the affordability, accessibility and repairability of internet communication devices continues to be an issue for consumers. 16% of respondents reported struggling to afford a device such as a mobile, tablet or laptop.<sup>32</sup> This research noted that supports targeting the affordability of devices would assist consumers on low incomes.<sup>33</sup> To assist consumers in attaining affordable mobile phones, ACCAN considers that a long-term device supply and replacement program be implemented at a national level.

ACCAN notes that research from Finder in 2022 noted that 49% of parents with children under 12 were unable to provide regular access to devices required for their children's education.<sup>34</sup> ACCAN considers that the government should consider a formalised pathway to ensure that the internet devices that are used and replaced through large corporate entities and governments are refurbished and provided to low-income consumers. ACCAN considers that the provision of these devices should be accompanied by digital inclusion-based support through resourced, reputable community organisations. This formalised pathway may be established through a legislated stewardship scheme or an equivalent. This scheme should:

- Ensure that low-income people without consistent access to internet devices receive the devices and digital inclusion support they require to enhance their economic participation and social wellbeing.
- Require that organisations or businesses who import or utilise a large number of devices contribute to the funding of this formalised pathway.
- Ensure that reputable and effective community services and organisations are utilised to disseminate these devices.
- Include resourcing for ongoing digital inclusion supports to consumers receiving these goods, provided to organisations who distribute internet devices.

Research by WorkVentures noted that '51.6% lower income families reported their children could miss out on the digital devices needed for schoolwork because they won't be able to afford them'.<sup>35</sup> This research also found that '84% students with inadequate access to a computer had trouble

<sup>32</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.8. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.

<sup>33</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.8. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.

<sup>34</sup> Finder. 2022. 'The digital divide: 49% of kids lack access to tech for school'. Available at: <https://www.finder.com.au/digital-divide-49-percent-of-kids-lack-tech-access>.

<sup>35</sup> WorkVentures. 2024. *Bridging the digital divide for Australia's disadvantaged school students*. Available at: <https://catalog.workventures.com.au/flip-book/366501/850282/page/1>.

finishing class work and assignments'.<sup>36</sup> Being able to access a suitable digital device has substantial benefits, '83% of surveyed students experienced improvement in their grades, and the majority (97%) indicating that their new laptop supported them in completing their homework and assignments'.<sup>37</sup> ACCAN supports WorkVentures' calls for the establishment of a National Device Bank.

ACCAN has been made aware that some First Nations consumers in remote areas experience consistent difficulty in attaining affordable internet devices and device repairs when their devices are no longer operational. ACCAN considers that government and telecommunications providers should take into account these concerns and address them due to the critical implications of reliable communications devices for community members in rural, regional and remote areas.

**Recommendation 3:** That the Federal Government funds and allocates accessible and affordable devices to people on low incomes without consistent access to internet devices. This should take the form of a formalised pathway which ensures that large purchasers of internet devices cooperate with government to achieve this aim.

**Recommendation 4:** That the Federal Government and telecommunications providers take steps to address the device availability and repairability concerns of consumers in First Nations communities, noting the criticality of internet device access and connectivity in these communities.

## Affordable communications device repair is critical for consumers experiencing low income or vulnerability

ACCAN notes that laptops and phones have a low effective life as defined by the Australian Tax Office (ATO). The ATO notes that:

- The effective life of mobile phones is three years.<sup>38</sup>
- The effective life of 'Mobile/portable computers (including laptops, tablets)' is two years.<sup>39</sup>
- The effective life of 'Desktop computers (including personal computers)' is four years.<sup>40</sup>

This is contrasted by the use patterns for these devices. The way consumers are using their mobile devices is changing and 'consumers are using holding on to their phones for longer'.<sup>41</sup> Mobile Muster research noted that:

- 41% of consumers' reason for upgrading their phone is because their existing phone has stopped working.<sup>42</sup>

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<sup>36</sup> WorkVentures. 2024. *Bridging the digital divide for Australia's disadvantaged school students*. Available at: <https://catalog.workventures.com.au/flip-book/366501/850282/page/1>.

<sup>37</sup> Ibid.

<sup>38</sup> <https://www.depreciationrates.net.au/telephony>.

<sup>39</sup> <https://www.depreciationrates.net.au/laptop>.

<sup>40</sup> <https://www.depreciationrates.net.au/computer>.

<sup>41</sup> Mobile Muster. 2020. *Insights into mobile phone use, reuse and recycling*. p.1. Available at: <https://www.mobilemuster.com.au/wp-content/uploads/2020/09/Mobile-phone-use-reuse-and-recycling.pdf>.

<sup>42</sup> Ibid p.6.

- ‘Australians are slower to upgrade their devices, which means mobile phones are being used for longer by the same owner’.<sup>43</sup>
- ‘72% of children receive their first phone as a hand-me down from their parents’.<sup>44</sup>

Many Australians choose to repair their digital devices. 38% of Australians have repaired a mobile phone in 2020 with 60% of those who have used a repair service being between the ages of 16-24.<sup>45</sup> According to Mobile muster, 67% of surveyed consumers have had a mobile device repaired at an independent repair shop. Mobile Muster noted that independent repair services respond to local market gaps and provide convenient and affordable repairs with quick turnarounds.<sup>46</sup>

Independent Repair Technicians (**IRTs**) face unnecessary barriers to repairing internet devices, driving up costs, impeding their ability to offer more affordable repairs to consumers and impacting how IRTs conduct their business. The Productivity Commission’s inquiry report into the right to repair (**the inquiry report**) identified “significant and unnecessary barriers” to consumers’ right to repair and made a range of findings and recommendations.<sup>47</sup>

The inquiry report found that:

- Consumers’ decision to repair or replace a broken product is primarily driven by price.<sup>48</sup>
- Some manufacturers are limiting IRTs’ access to repair supplies.<sup>49</sup>
- Manufacturer justifications for limiting the access of these resources are overstated.<sup>50</sup>

IRTs face significant barriers to their ability to repair devices. ACCAN’s engagement with IRTs revealed concerns about a lack of official access to schematics and diagnostics of devices and component supply chains leading to IRTs relying on third parties to access equivalent quality components. IRTs are impacted by the serialisation of mobile devices which limits their ability to repair devices by using a digital signature given to individual components, heavily incentivising consumers to only repair devices with their manufacturer or manufacturer-authorized repair service or else face limitations to their device’s functionality.

The increased difficulty of accessing intellectual property required to repair electronics has contributed to ‘decreasing opportunities for repair’.<sup>51</sup> Some larger IRTs cannot train repair skillsets in their staff due to the lack of certainty surrounding the volume of future repair work as a result of the decreased opportunities for repair.<sup>52</sup> These factors contribute to decreasing the availability of affordable internet device repairs for consumers who rely on them to stay connected.

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<sup>43</sup> Mobile Muster. 2020. *Insights into mobile phone use, reuse and recycling*. p.5. Available at: <https://www.mobilemuster.com.au/wp-content/uploads/2020/09/Mobile-phone-use-reuse-and-recycling.pdf>.

<sup>44</sup> Ibid. p.9.

<sup>45</sup> Ibid. p.14.

<sup>46</sup> Mobile Muster. 2020. *Insights into mobile phone use, reuse and recycling*. p.14. Available at: <https://www.mobilemuster.com.au/wp-content/uploads/2020/09/Mobile-phone-use-reuse-and-recycling.pdf>.

<sup>47</sup> Productivity Commission. 2021. *Inquiry Report - Right to Repair Overview & Recommendations*. p.6. Available at: <https://www.pc.gov.au/inquiries/completed/repair/report/repair-overview.pdf>

<sup>48</sup> Ibid p.29.

<sup>49</sup> Ibid p.31

<sup>50</sup> Ibid p.31.

<sup>51</sup> WorkVentures. 2023. *WorkVentures submission to the Regulation for small electrical products and solar photovoltaic systems*. p.2.

<sup>52</sup> WorkVentures. 2023. *WorkVentures submission to the Regulation for small electrical products and solar photovoltaic systems*. p.2.

Restrictive repair practices and increased repair costs disproportionately impact those least well placed to absorb these expenses.

- Nearly half of all consumers and 60% of 25–44-year-old consumers identify their smartphone as their main digital device.<sup>53</sup>
- People who live with a disability are likely to live on lower fixed incomes and have less money available for new device purchases if an older device breaks.
- According to CHOICE, consumers in regional areas face more prominent barriers to repair as they deal with limited repair options and longer wait times.<sup>54</sup>
- Mobile muster reported that 67% of surveyed consumers have had their mobile device repaired by an IRT and regional areas rely on IRTs for affordable and timely repairs.<sup>55</sup>
- Restrictive repair practices can increase the price of repair for many consumers and limit the options for affordable repair.

A legislated right to repair would benefit consumers and small businesses by:

- Improving consumers' access to affordable repairs for their internet devices.
- Improving consumers' access to affordable secondhand devices through third party channels as more devices are sold or transferred between consumers.
- Ensuring that IRTs can provide a wider range of repairs to consumers and are not inhibited in their ability to do so by device manufacturers.
- Ensuring that consumers retain their internet devices for longer, leading to consumer savings from replacing their devices less often.
- Improving environmental outcomes from internet device recycling, leading to savings incurred due to decreased e-waste processing fees.

The Federal Government should legislate a right to repair following the recommendations of the inquiry report. Doing so would decrease the barriers that IRTs face in operating their businesses and improve the affordability of devices and device repair for low-income consumers.

ACCAN considers that Recommendation 6.1 of the inquiry report should take into account international trials of repairability labelling.<sup>56</sup> An Australian adaptation of this scheme should include an independent labelling review body to avoid the conflict-of-interest present in manufacturers reviewing their own devices.<sup>57</sup> The index should be improved over time and have its data placed on a public website.<sup>58</sup> More than 85 percent of Australian consumers would value information on product lifespan, repairability and software support.<sup>59</sup>

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<sup>53</sup> IT wire. 2022. *Australian smartphone sales growing slowly, with Android gaining market share*. Available at: <https://itwire.com/it-industry-news/market/australian-smartphone-sales-growing-slowly-with-android-gaining-market-share.html>

<sup>54</sup> CHOICE. 2021. *Submission to the productivity commission right to repair*. p.18.

<sup>55</sup> Mobile Muster. 2020. *Insights into mobile phone use, reuse and recycling*. p.14. Available at: <https://www.mobilemuster.com.au/wp-content/uploads/2020/09/Mobile-phone-use-reuse-and-recycling.pdf>.

<sup>56</sup> HaltObsolescence. 2022. *The French repairability index A first assessment – one year after its implementation*. Available at: <https://www.halteobsolescence.org/wp-content/uploads/2022/02/Rapport-indice-de-reparabilite.pdf>.

<sup>57</sup> Ibid p.2.

<sup>58</sup> Ibid p.44.

<sup>59</sup> CHOICE. 2021. *Submission to the productivity commission right to repair*. p.26.

A legislated right to repair may be achieved through the insertion of a new provision into the *Competition and Consumer Act 2010* (Cth). A legislated right to repair should include provisions to:

- Enable consumers and small businesses to obtain accessible repair documentation including the schematics, diagnostics, semiconductor documentation datasheets, circuit diagrams, service manuals of consumer and businesses devices.<sup>60</sup>
- Ensure that device manufacturers make specialised tools available to IRTs.<sup>61</sup>
- Establish an independent device repairability labelling review scheme to give Australians information on product lifespan, repairability and software support.
- Require that device manufacturers design repairable products.<sup>62</sup>

**Recommendation 5:** That the Federal Government should allocate funding to establish a legislated right to repair following the recommendations of the Productivity Commission’s inquiry report into the right to repair.

**Recommendation 6:** That the Federal Government should allocate funding to establish an independent device repairability index following Recommendation 6.1 of the Productivity Commission’s inquiry report into the right to repair. This independently reviewed index would provide consumers with valuable product information to inform their purchasing decisions.

## Affordable Voice Services

While fixed voice services have declined in use in Australia, they remain essential communications services for many Australians, including vulnerable consumers. The ACMA noted that around 1 in 4 Australians used fixed line voice services in 2022 and more than 3 in 5 Australians aged over 75 used a fixed line voice service in the first half of 2022.<sup>63</sup> ACCAN research noted that only 1 in 5 consumers pay for a landline connection.<sup>64</sup> ACCAN has previously noted that consumers of fixed line voice services pay a relatively high price for this service.<sup>65</sup> As fixed voice services are more often used by older Australians and those located in regional, rural, and remote areas, this pricing disproportionately impacts consumers with less ability to afford higher fixed voice connectivity costs. Additionally, almost half of surveyed consumers noted that they experienced some difficulty paying for landline services.<sup>66</sup>

Consumers who are least well placed to experience higher connectivity costs should receive assistance to cover these costs, especially in instances where access to connectivity is critical. ACCAN believes that the Federal Government should allocate funding to provide an affordable voice concession service to support Age Pension and Disability Support Pension recipients to access home

<sup>60</sup> Ifixit. 2021. *Response to request for information from the Australian Productivity Commission*. p.4. Available at: [https://www.pc.gov.au/data/assets/pdf\\_file/0005/272696/sub107-repair.pdf](https://www.pc.gov.au/data/assets/pdf_file/0005/272696/sub107-repair.pdf).

<sup>61</sup> Ibid p.5.

<sup>62</sup> Ifixit. 2021. *Response to request for information from the Australian Productivity Commission*. p.9. Available at: [https://www.pc.gov.au/data/assets/pdf\\_file/0005/272696/sub107-repair.pdf](https://www.pc.gov.au/data/assets/pdf_file/0005/272696/sub107-repair.pdf).

<sup>63</sup> ACCC. 2023. *Communications Market Report 2022-2023*. p.24. Available at: <https://www.accc.gov.au/system/files/communications-market-report-2022-23.pdf>

<sup>64</sup> ACCAN. 2023. *ACCAN Research Snapshot: Affordability*. p.4. Available at: <https://accan.org.au/accans-work/research/2251-affordability-snapshot-2023>.

<sup>65</sup> ACCAN. 2022. *Pre-Budget Submission 2022-2023*. p.9. Available at: <https://accan.org.au/accans-work/submissions/1953-accan-pre-budget-submission-2022-2023?highlight=WyjwcmUtYnVkZ2V0IIO=>.

<sup>66</sup> Ibid.



phone services.<sup>67</sup> ACCAN believes that the government should give consideration to all forms of consumer vulnerability and the rising cost of living when determining the concession target.

**Recommendation 7:** That the Federal Government should allocate funding to provide an affordable voice concession service to support Age Pension and Disability Support Pension recipients to access home phone services.

## Reliable, Resilient and Robust Infrastructure

### Mobile Black Spots and Regional Connectivity Programs

ACCAN supports the announcements made in the 2023-2024 budget with regard to the extension of and expansion of the Mobile Black Spot Program (**MBSP**), including:

- The December 2023 announcement of a total of \$170.2 million of funding awarded to 136 mobile and broadband solutions across Australia with \$55 million delivered through Round 7 of the MBSP.<sup>68</sup>
- The October 2023 announcement of \$37.2 million through the Improving Mobile Coverage Round of the MBSP.<sup>69</sup>

ACCAN considers that the budget should take account the recommendations of the First Nations Digital Inclusion Advisory Group's initial report (**the initial report**).<sup>70</sup> This includes:

- 'That at least 10 per cent of available funding be provided to projects which benefit First Nations people and communities'.<sup>71</sup>
- That the Federal Government consider a 'specific allocation of the Regional Connectivity Program (**RCP**) to address the connectivity needs in the 670 remote First Nations homelands currently without any kind of coverage'.<sup>72</sup>
- 'Establishing a further round of the MBSP to target remote communities who have been previously ineligible for funding due to lack of commercial interest and co-investment limitations'.<sup>73</sup>
- That the Federal Government alter the process for applying for grant funding to make it easier for smaller First Nations communities to attain funding and to receive robust feedback on their applications.<sup>74</sup>
- That the National Indigenous Australians Agency's (**NIAA**) stakeholders have indicated that 'First Nations communities are typically not aware of existing Federal Government funding

<sup>67</sup> ACCAN. 2022. *Pre-Budget Submission 2022-2023*. p.9. Available at: <https://accan.org.au/accans-work/submissions/1953-accan-pre-budget-submission-2022-2023?highlight=WyJwcmUtYnVkZ2V0llo=>.

<sup>68</sup> DITRDA. 2023. *Mobile Black Spot Program*. Available at: <https://www.infrastructure.gov.au/media-communications-arts/phone/mobile-services-and-coverage/mobile-black-spot-program>.

<sup>69</sup> Ibid.

<sup>70</sup> First Nations Digital Inclusion Advisory Group. 2023. *Initial Report*. Available at: <https://www.digitalinclusion.gov.au/sites/default/files/documents/first-nations-digital-inclusion-advisory-group-initial-report.pdf>.

<sup>71</sup> First Nations Digital Inclusion Advisory Group. 2023. *Initial Report*. p.21. Available at: <https://www.digitalinclusion.gov.au/sites/default/files/documents/first-nations-digital-inclusion-advisory-group-initial-report.pdf>.

<sup>72</sup> Ibid.

<sup>73</sup> Ibid p.42.

<sup>74</sup> Ibid p.42.

opportunities or do not have relationships or resources to partner with telecommunications carriers and other stakeholders to support the preparation of funding proposals'. ACCAN considers that in response to this the Federal Government should develop and improve upon appropriate supports to facilitate knowledge of these programs.<sup>75</sup>

ACCAN considers that the Federal Government taking steps towards the above recommendations would facilitate action on the priorities of the First Nations Digital Inclusion Plan 2023-2026.<sup>76</sup> ACCAN supports the Federal Government continuing the MBSP and the RCP to assist in improving Australia's connectivity outcomes in line with its Better Connectivity Plan for Rural and Regional Australia.<sup>77</sup>

**Recommendation 8:** That the Federal Government continue funding the Mobile Black Spot Program and Regional Connectivity Program to assist in improving Australia's connectivity outcomes in line with its Better Connectivity Plan for Rural and Regional Australia.

**Recommendation 9:** That the Federal Government should take account the recommendations of the First Nations Digital Inclusion Advisory Group's initial report, especially regarding the ability of First Nations communities to interact with existing government grant programs.

## Remote First Nations Communities

ACCAN supports the existing policy responses and funding allocated to support First Nations consumers in remote communities detailed in the First Nations Digital Inclusion Plan 2023-2026.<sup>78</sup> Additionally, we support the undertaking of the 2024 Regional telecommunications review to examine the adequacy of regional telecommunications.<sup>79</sup>

Digital inclusion and digital access in first nations communities is critical to ensure equitable telecommunications access. 'Digital exclusion affects the ability of First Nations people to participate in the online economy; access government services (which are increasingly moving online); access other services, such as education and employment; enjoy entertainment and leisure activities available to other Australians; and remain connected to their communities and culture'.<sup>80</sup> The 2023 ADII report detailed the current state of digital inclusion for First Nations telecommunications consumers. The report noted:

- 'There is a considerable digital gap between First Nations and non-First Nations people in Australia'.<sup>81</sup>

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<sup>75</sup> NIAA. 2023. *First Nations Digital Inclusion Plan 2023-2026*. p.12. Available at:

<https://www.niaa.gov.au/sites/default/files/publications/first-nations-digital-inclusion-plan-2023-2026.pdf>.

<sup>76</sup> Ibid. p.15.

<sup>77</sup> DITRDCA. 2023. *Mobile Black Spot Program*. Available at: <https://www.infrastructure.gov.au/media-communications-arts/phone/mobile-services-and-coverage/mobile-black-spot-program>.

<sup>78</sup> NIAA. 2023. *First Nations Digital Inclusion Plan 2023-2026*. p.13. Available at:

<https://www.niaa.gov.au/sites/default/files/publications/first-nations-digital-inclusion-plan-2023-2026.pdf>.

<sup>79</sup> NIAA. *Regional Telecommunications Review*. Available at: <https://www.niaa.gov.au/indigenous-affairs/closing-gap/implementation-measures/regional-telecommunications-review>.

<sup>80</sup> First Nations Digital Inclusion Advisory Group. 2023. *Initial Report*. p.3. Available at:

<https://www.digitalinclusion.gov.au/sites/default/files/documents/first-nations-digital-inclusion-advisory-group-initial-report.pdf>.

<sup>81</sup> Australian Digital Inclusion Index. 2023. *Measuring Australia's Digital Divide*. p.6. Available at:

<https://www.digitalinclusionindex.org.au/key-findings-and-next-steps/>.

- ‘The gap is particularly pronounced between First Nations and non-First Nations people living in remote (21.6 points) and very remote (23.5 points) locations, although it exists across most areas regardless of remoteness’.<sup>82</sup>
- 21.3% of First Nations people are mobile only telecommunications consumers.<sup>83</sup>

ACCAN notes that remote First Nations communities consistently face connectivity issues and often experience lower quality connectivity than urban consumers.<sup>84</sup> Numerous sources have noted the issues experienced by remote First Nations communities. These include:

- Unreliable communications services.<sup>85</sup>
- The lack of ability to contact emergency services.<sup>86</sup>
- Data sovereignty and online safety.<sup>87</sup>
- Issues related to the digital inclusion and digital ability of some First Nations consumers in rural and remote communities.<sup>88</sup>
- Affordability concerns regarding telecommunications products and services.<sup>89</sup>
- Government services increasingly moving online, leading to a lack of access for remote First Nations consumers.<sup>90</sup>

Additionally, the Royal Melbourne Institute of Technology noted that:

- ‘About 43% of the 1,545 First Nations communities and homelands across Australia have no mobile service – including some with only a shared public phone or no telecommunications access’.<sup>91</sup>
- ‘53.3% of First Nations people surveyed in the study said they had sacrificed paying for essentials such as food or bills to stay connected, compared to 19.1% of other Australians’.<sup>92</sup>

<sup>82</sup> Australian Digital Inclusion Index. 2023. *Measuring Australia’s Digital Divide*. p.6. Available: <https://www.digitalinclusionindex.org.au/key-findings-and-next-steps/>.

<sup>83</sup> Ibid p.6.

<sup>84</sup> ACCC. 2023. *Regional Mobile Infrastructure Inquiry*. p.1. Available at:

<https://www.accc.gov.au/system/files/Regional%20Mobile%20Infrastructure%20Inquiry%20final%20report.pdf>.

<sup>85</sup> ACCC. 2023. *Regional Mobile Infrastructure Inquiry*. p.97. Available at:

<https://www.accc.gov.au/system/files/Regional%20Mobile%20Infrastructure%20Inquiry%20final%20report.pdf>.

<sup>86</sup> QUT Digital Media Research Centre. 2023. *Connecting in the gulf: digital inclusion of Indigenous families living on Mornington Island*. p.39. Available at: [https://research.qut.edu.au/dmrc/wp-content/uploads/sites/5/2023/03/Connecting-in-the-Gulf-Final-Report\\_March2023-1.pdf](https://research.qut.edu.au/dmrc/wp-content/uploads/sites/5/2023/03/Connecting-in-the-Gulf-Final-Report_March2023-1.pdf).

<sup>87</sup> Ibid p.39.

<sup>88</sup> Australian Digital Inclusion Index. 2023. *Measuring Australia’s Digital Divide*. p.6. Available:

<https://www.digitalinclusionindex.org.au/key-findings-and-next-steps/>.

<sup>89</sup> Ibid.

<sup>90</sup> First Nations Digital Inclusion Advisory Group. 2023. *Initial Report*. p.21. Available at:

<https://www.digitalinclusion.gov.au/sites/default/files/documents/first-nations-digital-inclusion-advisory-group-initial-report.pdf>.

<sup>91</sup> RMIT. 2023. *Remote First Nations communities are among the most digitally excluded people in Australia: report*. Available at: <https://www.rmit.edu.au/news/all-news/2023/sep/mapping-digital-gap#:~:text=About%2043%25%20of%20the%201%2C545,to%20close%20the%20digital%20gap>.

<sup>92</sup> RMIT. 2023. *Remote First Nations communities are among the most digitally excluded people in Australia: report*. Available at: <https://www.rmit.edu.au/news/all-news/2023/sep/mapping-digital-gap#:~:text=About%2043%25%20of%20the%201%2C545,to%20close%20the%20digital%20gap>.

ACCAN supports the establishment of the First Nations Digital Advisory Group and welcomes the initial report.<sup>93</sup> ACCAN considers that the Federal Government should act on the recommendations of the initial report, in particular:

- Deliver targeted measures to support the three elements of digital inclusion.<sup>94</sup>
- Improving the national collection and use of data on remote First Nations communities.<sup>95</sup>
- Ensuring genuine engagement and collaboration with First Nations people and communities and supporting their access to government programs and opportunities.<sup>96</sup>

ACCAN supports the initial report's framing of the future of digital inclusion support in remote First Nations communities:<sup>97</sup>

*'Adopting a place-based approach and developing partnerships between governments and First Nations people, as well as industry and the not-for-profit sector, is vital to improving digital inclusion'.<sup>98</sup>*

**Recommendation 10:** That the Federal Government should act on the recommendations of the First Nations Digital Advisory Group's initial report and ensure genuine engagement and collaboration with First Nations people and communities.

## Emerging New Services: Low Earth Orbit Satellites and Natural Disasters

Natural disasters can have significant impacts on communities and telecommunications connectivity across Australia. Research has shown that 76% of Australians living in regional or rural locations as well as major regional centres had experienced a natural disaster in the last 5 years.<sup>99</sup> ACCAN supports the 2023-2024 budget commitment to allocate \$10.1 million to establish a taskforce to progress a public safety mobile broadband capability in addition to the rolling out of a cell broadcast national messaging system.<sup>100</sup>

The ACCC communications market report notes significant developments in the take up of Low Earth Orbit Satellites (**LEOSats**) in the provision of communications services.

- Starlink reached over 120,000 Australian customers by May 2023.<sup>101</sup>
- Vocus and Telstra have announced plans to provide star link services to regional and remote consumers.<sup>102</sup>

<sup>93</sup> First Nations Digital Inclusion Advisory Group. 2023. *Initial Report*. p.21. Available at:

<https://www.digitalinclusion.gov.au/sites/default/files/documents/first-nations-digital-inclusion-advisory-group-initial-report.pdf>.

<sup>94</sup> Ibid.

<sup>95</sup> Ibid p.29.

<sup>96</sup> Ibid p.4.

<sup>97</sup> Ibid. p.4.

<sup>98</sup> Ibid. p.4.

<sup>99</sup> ACCAN. 2023. *Select Committee on Australia's Disaster Resilience*. p.1. Available at:

<https://accan.org.au/files/Submissions/2023/ACCAN%20Submission%20to%20the%20Select%20Committee%20on%20Australias%20Disaster%20Resilience.pdf>.

<sup>100</sup> DITRCA. 2023. *Budget 2023-24: Connecting, informing and protecting Australians*. Available at:

<https://minister.infrastructure.gov.au/rowland/media-release/budget-2023-24-connecting-informing-and-protecting-australians>.

<sup>101</sup> ACCC. 2023. *Communications Market Report 2022-2023*. p.9. Available at: <https://www.accc.gov.au/system/files/communications-market-report-2022-23.pdf>.

<sup>102</sup> Ibid.

- Telstra has also entered into an agreement with OneWeb to use LEOSat connectivity at mobile sites in remote areas, or as redundancy option in case of disruption of its terrestrial backhaul network.<sup>103</sup>
- Optus partnered with Starlink to trial direct-to-handset service. Optus stated that it plans to provide SMS services from late 2024, and voice and data services from late 2025.<sup>104</sup>

ACCAN considers that future expansions in telecommunications connectivity facilitated through LEOSats should be accompanied by research into their ability to be utilised as a means of communications redundancy during natural disasters. Currently, LEOSats may prove effective in assisting consumers to maintain communications connectivity during natural disaster events, however their use is currently limited by high cost and slow deployment.<sup>105</sup> ACCAN believes that the government should consider undertaking further research to determine the effectiveness of satellite phone communications in natural disaster settings given the promising indications of existing research on their utility.<sup>106</sup>

**Recommendation 11:** That the Federal Government should allocate funding to undertake further research to determine the effectiveness of satellite phone communications, in particular LEOSats as a form of communications redundancy during natural disasters.

Consumers and small businesses require reliable mobile and broadband connectivity to support their participation in the Australian economy. Research by the ACMA found that the total number of mobile services in Australia increased from 36.8 million in 2021 to 39.6 million in 2022.<sup>107</sup> Additionally, there was a larger increase in the number of prepaid services (10%) than post-paid services (2%).<sup>108</sup> The increasing number of mobile services in Australia warrants further revision of the existing reliability framework of mobile communications.

Internationally, communications regulators have noted that severe weather events are likely to increasingly disrupt the telecommunications sector.<sup>109</sup> The Canadian telecommunications regulator noted that the importance of investments into reliability is ‘further highlighted by the need for networks that can withstand severe weather events and meet network reliability and access challenges’.<sup>110</sup>

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<sup>103</sup> ACCC. 2023. *Communications Market Report 2022-2023*. p.9. Available at: <https://www.accc.gov.au/system/files/communications-market-report-2022-23.pdf>.

<sup>104</sup> Ibid p.10.

<sup>105</sup> Ibid p.9.

<sup>106</sup> Ibid p.9.

<sup>107</sup> ACMA. 2023. *Communications and Media in Australia. Trends and Developments in telecommunications 2022-2023*. p.17. Available at: [https://www.acma.gov.au/sites/default/files/2023-12/Trends%20and%20developments%20in%20telecommunications%202022-23\\_0.pdf](https://www.acma.gov.au/sites/default/files/2023-12/Trends%20and%20developments%20in%20telecommunications%202022-23_0.pdf).

<sup>108</sup> Ibid p.19.

<sup>109</sup> PWC. 2023. *Connecting Canadians through resilient networks – the impact of the telecom sector in 2022 and beyond*. Available at: <https://canadatelecoms.ca/wp-content/uploads/2023/11/Connecting-Canadians-through-resilient-networks.pdf>.

<sup>110</sup> PWC. 2023. *Connecting Canadians through resilient networks – the impact of the telecom sector in 2022 and beyond*. p.4. Available at: <https://canadatelecoms.ca/wp-content/uploads/2023/11/Connecting-Canadians-through-resilient-networks.pdf>.

ACCAN's research into consumer perspectives of reliability and fairness found:

- Consumers expect their phone and internet services to be reliable and work in emergency situations.<sup>111</sup>
- Mobile phone and home internet connections are deemed to be the most essential connection types.<sup>112</sup>
- 88% of consumers expected their phone and internet services to work during emergencies such as bushfires and floods.<sup>113</sup>

In response to reliability concerns experienced by consumers, ACCAN considers that:

- The Federal Government should establish clear communications guidelines for telecommunications companies to follow in response to unplanned outages.<sup>114</sup>
- Accept the recommendations made by the inquiry into multi-carrier regional mobile infrastructure to create a working group to develop protocols for temporary roaming arrangements in disasters and emergency situations.<sup>115</sup>
- Accept the recommendations made by the inquiry into multi-carrier regional mobile infrastructure which improve mobile and broadband connectivity.<sup>116</sup>
- That the Federal Government immediately consider what steps may facilitate the adoption of 'Next Generation Triple Zero' services, including direct text to Triple Zero, as well as guaranteed NRS access to the emergency call service.<sup>117</sup>

ACCAN supports the Federal Government's intention to establish a further round of the Mobile Network Hardening Program in 2024.<sup>118</sup> ACCAN recommends that the Treasury take into account our recommendations for improved broadband and mobile reliability from previous Pre-Budget submissions.<sup>119</sup>

**Recommendation 12:** That the Federal Government re-establishes the Communications Fund with a mandate to invest its assets commercially and uses the proceedings for funding essential communications programs.

**Recommendation 13:** That the Federal Government invest in initiatives aimed at improving broadband reliability, including prioritising progress on the draft standards, rules, and benchmarks for Statutory Infrastructure Providers.

<sup>111</sup> ACCAN. 2022. *ACCAN Research Snapshot: Consumer expectations- reliability and fairness*. p.1. Available at: <https://accan.org.au/accans-work/research/2003-consumer-expectations-2022>.

<sup>112</sup> Ibid.

<sup>113</sup> Ibid p.2.

<sup>114</sup> ACCAN. 2023. *ACCAN Submission to the Senate Inquiry on the Optus Network Outage*. p.1. Available at: <https://accan.org.au/accans-work/submissions/2258-optus-network-outage?highlight=WyjvcHR1cyIsIm9wdHVzJyIsIidvcHR1cyIsIm9wdHVzJ3MiXQ==>.

<sup>115</sup> Ibid. p.2.

<sup>116</sup> Parliament of Australia. 2023. *Connecting the country: Mission Critical - Inquiry into co-investment in multi-carrier regional mobile infrastructure*. p. XV. Available at: [https://parlinfo.aph.gov.au/parlInfo/download/committees/reportrep/RB000010/toc\\_pdf/ConnectingthecountryMissioncritical.pdf](https://parlinfo.aph.gov.au/parlInfo/download/committees/reportrep/RB000010/toc_pdf/ConnectingthecountryMissioncritical.pdf).

<sup>117</sup> ACCAN. 2023. *ACCAN Submission to the Senate Inquiry on the Optus Network Outage*. p.2. Available at: <https://accan.org.au/accans-work/submissions/2258-optus-network-outage?highlight=WyjvcHR1cyIsIm9wdHVzJyIsIidvcHR1cyIsIm9wdHVzJ3MiXQ==>.

<sup>118</sup> DITRDCA. 2023. *Mobile Network Hardening Program*: <https://www.infrastructure.gov.au/media-communications-arts/phone/mobile-network-hardening-program>.

<sup>119</sup> ACCAN. 2022. *Pre-Budget Submission 2022-2023*. Available at: <https://accan.org.au/accans-work/submissions/1953-accan-pre-budget-submission-2022-2023?highlight=WyjwcmUtYnVkZ2V0Ii0=>. ACCAN. 2023. *Pre-Budget Submission 2023-2024*. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyjwcmUiXQ==>.

**Recommendation 14:** That the Federal Government allocates funding from general revenue for the ACMA to investigate and monitor mobile outages and the reliability of mobile infrastructure across Australia, to identify if measures are needed to increase mobile reliability.

**Recommendation 15:** That the Federal 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 16:** That the Federal Government allocates funding to the Mobile Black Spot Program to promote access to 24-hours of auxiliary back-up power in isolated areas and provide additional support to enable local communities to broker partnerships through facilitators and resources.

**Recommendation 17:** That the Federal Government should establish clear communications guidelines for telecommunications companies to follow in response to unplanned outages.

**Recommendation 18:** Accept the recommendations made by the inquiry into co-investment in multi-carrier regional mobile infrastructure to improve telecommunications connectivity and reliability.

**Recommendation 19:** That the Federal Government immediately consider what steps may facilitate the adoption of 'Next Generation Triple Zero' services, including direct text to Triple Zero, as well as guaranteed NRS access to the emergency call service.

## Growing Consumer Confidence

### Digital Platforms Consumer Representation

Digital communications are fundamental to how Australians communicate and live their daily lives, with 95% of Australians using a communication or social media website or app for personal purposes.<sup>120</sup> Digital communications services also have economic functions and are a significant portion of the modern digital economy.

There is currently no dedicated consumer advocacy organisation to represent Australian consumers of digital platforms. The digital platforms environment is ever expanding, and Australian consumers should be able to rely on an independent consumer advocacy body to ensure their interests are represented. This body should be funded to properly engage with the many emerging issues facing Australian consumers on digital platforms. The existing consumer representation which occurs related to the interests of Australian consumers of digital platforms is conducted by a range of organisations and resourcing one independent organisation to take on this task will free up the resourcing of otherwise under-resourced and overstretched advocacy and community organisations.

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<sup>120</sup> ACMA.2023. *How we communicate: Executive summary and key findings*. p.1. Available at: <https://www.acma.gov.au/publications/2023-12/report/communications-and-media-australia-how-we-communicate#:~:text=Our%20How%20we%20communicate%20interactive,social%20media%20sites%20and%20apps>.

Future digital platforms discourses and consultations will require further consumer engagement and consultation.

A 2022 consultation released by Treasury noted that the effectiveness of different regulatory schemes on digital platforms is unknown and will require ongoing consumer engagement and representation.<sup>121</sup> The lack of an independent consumer representative in the digital platforms space may also lead to an imbalance of perspectives with relation to digital platforms policy discussions.<sup>122</sup>

ACCAN recommends that the Federal Government allocate funding to co-invest 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.<sup>123</sup>

**Recommendation 20:** That the Federal Government allocate funding to support consumer representation in digital platforms policy.

## Improved Accessibility of Communications Services and Devices

The 2024-2025 budget should take into account the accessibility requirements of Australians living with a disability and support access to accessible telecommunications goods and services to ensure that people with disability are able to equally participate in society. 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'.<sup>124</sup> Funding accessible, reliable, affordable digital communications is critical for ensuring that many Australians can effectively participate in the economy, gain meaningful employment and engage in social endeavours.

### Accessible Telecoms

Accessible Telecoms is a free and independent services which provides consumers with up-to-date information on telecommunication products and services that are suitable for seniors and people with disabilities.<sup>125</sup> The Accessible Telecoms website:

- Receives more than 10,000 unique users per month.
- Received more than 14,000 unique website views per month.<sup>126</sup>

<sup>121</sup> ACCAN. 2023. *Influence of International Digital Platforms*. p.3. Available at: <https://accan.org.au/accans-work/submissions/2074-influence-of-international-digital-platforms>.

<sup>122</sup> ACCAN. 2023. *Digital Platforms: Government consultation on ACCC's regulatory reform recommendations Consultation Paper*. p.2. Available at: <https://accan.org.au/accans-work/submissions/2061-digital-platforms-regulatory-reforms>.

<sup>123</sup> ACCAN. 2023. *Influence of International Digital Platforms*. p.3. Available at: <https://accan.org.au/accans-work/submissions/2074-influence-of-international-digital-platforms>.

<sup>124</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.13. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.

<sup>125</sup> Accessible Telecoms. Available at: <https://www.accessibletelecoms.org.au/>.

<sup>126</sup> The Accessible Telecoms website began achieving these statistics in November 2023.



Developed and implemented by ACCAN in 2018 through a National Disability Insurance Agency grant, ACCAN is pleased to have received funding through the DITRDCA to continue operating the Accessible Telecoms service into 2025 and would benefit from a long-term funding arrangement that supports digital inclusion for people with disability as State and Federal governments develop and implement digital transformation strategies.

**Recommendation 21:** That the DITRDCA develop a long-term funding arrangement for the Accessible Telecoms service to reflect the digital transformation strategies of State and Federal Governments.

## Accessibility of online information and services

Ensuring that telecommunications consumers with a disability have equal access to online, digital and non-digital information is critical to enhancing the economic participation of many Australians. Inaccessible communications technologies exclude people with disability from accessing education, employment, health, and social opportunities, all of which are primarily digital and online.<sup>127</sup> 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). We consider that these information sources should be compliant with the highest Web Content Accessibility Guidelines (**WCAG**)'.<sup>128</sup>

ACCAN considers that achieving this aim would more easily allow previously excluded cohorts to participate in the economic and social benefits of internet connectivity as well as ensure compliance and cohesion with the United Nations Convention on the Rights of Persons with Disabilities.<sup>129</sup> Every government website must be presented in a variety of accessible formats in order to meet the expectations of Australians. Additionally, ACCAN considers that the Federal Government should allocate funding towards the development of a national plan to promote accessible information and communications.<sup>130</sup>

**Recommendation 22:** That the Federal Government allocates funding to ensure government websites are compliant with the Web Content Accessibility Guidelines (WCAG) 2.1 AA and successor standards.

**Recommendation 23:** That the Federal 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.

<sup>127</sup> ACCAN. 2024. *Submission on the Australian Government response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*. p.1. Available at: <https://accan.org.au/accans-work/submissions/2268-royal-commission-into-violence>.

<sup>128</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.13. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.

<sup>129</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.13. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.

<sup>130</sup> ACCAN. 2024. *Submission on the Australian Government response to the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability*. p.1. Available at: <https://accan.org.au/accans-work/submissions/2268-royal-commission-into-violence>.

**Recommendation 24:** That the Federal Government allocate funding towards the development of a national plan to promote accessible information and communications.

## Digital Ability

It is critical that telecommunications consumers with a disability are supported with digital capacity training programs to meet their needs. The 2023 Australian Digital Inclusion Index noted that highly excluded Australians are more likely to be living with a disability.<sup>131</sup>

Poorly designed digital communications technology, content and devices impede access to ICT services such as government information, banking and financial services and constitute a barrier to enhanced economic participation.<sup>132</sup> Investing funding into digital inclusion support services may return a significantly greater economic benefit than the cost of those services. A report launched in 2022 report launched by the Good Things Foundation noted that there was a £9.48 return for every £1 invested in digital inclusion services.<sup>133</sup> This report noted that savings to taxpayers can be experienced in the areas of improved government efficiency, increased tax revenue and improved healthcare efficiency as a result of investments in digital inclusion.<sup>134</sup>

The Federal Government should consider ensuring future digital inclusion initiatives and programs are implemented in accessible formats for consumers who live with cognitive impairment, vision impairment, as well as consumers who have low literacy and consumers who are from diverse cultural backgrounds.<sup>135</sup>

**Recommendation 25:** That the Federal 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.

## Audio description

It is essential that people who are blind or have low vision are enabled to enjoy television through audio description. Existing funding for audio description to channels such as SBS and the ABC allows approximately 14 hours per week of audio description content. This requirement is not currently extended to free-to-air commercial television, limiting the ability of people who are blind or have low vision to have equitable access to television in Australia.<sup>136</sup> This status quo caused the United Nations Committee on the Rights of Persons with Disability to find Australia in breach of its human

<sup>131</sup> Australian Digital Inclusion Index. 2023. Measuring Australia's Digital Divide. p.10. Available at: <https://www.digitalinclusionindex.org.au/key-findings-and-next-steps/>.

<sup>132</sup> European Bank for reconstruction and development. 2020. *Economic inclusion for people with disabilities: Challenges and responses*. p.3. Available at: <https://www.ebrd.com/documents/corporate-strategy/report-economic-inclusion-for-people-with-disabilities.pdf>.

<sup>133</sup> Good things foundation. 2024. *The economic impact of digital inclusion in the UK*. Available at:

<https://www.goodthingsfoundation.org/insights/the-economic-impact-of-digital-inclusion-in-the-uk/>.

<sup>134</sup> Good Things foundation. 2022. *The economic case for digital inclusion Cebr 2022*. p.2. Available at:

<https://www.goodthingsfoundation.org/wp-content/uploads/2022/07/Good-Things-Foundation-and-CEBR-2022-%E2%80%93-Executive-Summary.pdf>.

<sup>135</sup> ACCAN. 2023. *ACCAN submission to the consultation on the initial data and digital strategy consultation*. p.4. Available at:

<https://accan.org.au/accans-work/submissions/2173-initial-data-and-digital-government-strategy>.

<sup>136</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.14. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.

rights obligations under the *Convention on the Rights of Persons with Disabilities* 'as audio description is not consistently available on Australian television and there is no clear Government plan to ensure it is'.<sup>137</sup>

In accordance with our recommendation in ACCAN's 2023-2024 pre-budget submission, ACCAN urges the Federal 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.<sup>138</sup> ACCAN urges that the government commit annual funding to audio description for free-to-air commercial television.

**Recommendation 26:** The Federal 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 the ABC.

***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](#)***

<sup>137</sup> Public Interest Advocacy Centre. 2023. *Australian Government urged to strengthen response on audio description*. Available at: <https://piac.asn.au/2023/05/23/australian-government-urged-to-strengthen-response-on-audio-description/>.

<sup>138</sup> ACCAN. 2023. *Pre-Budget Submission 2023-2024*. p.14. Available at: <https://accan.org.au/accans-work/submissions/2055-pre-budget-submission-2023-2024?highlight=WyJwcmUiXQ==>.