

First Nations Community Wi-Fi Program – Draft Grant Opportunity Guidelines

10 December 2024

Recommendations

This submission recommends the Department:

- > Support a capabilities-led approach that ensures investment reflect changing consumer needs and expectations.
- > Amend Section 3.4. to require consultation with the relevant local, state, and territory governments.
- > Amend Section 6.1. to make it mandatory to provide back-up power supply and culturally appropriate digital support for community members.
- > Amend Section 7.1. to support the development of resources in a range of accessible formats including Easy English, plain English, braille, large print and Auslan.

About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**the Department**) commenting on the proposed First Nations Community Wi-Fi Program – Draft Grant Opportunity Guidelines (**the Draft Guidelines**).

ACCAN is the peak national consumer advocacy organisation for communications working to achieve trusted, accessible, inclusive, affordable and available communications and digital services for all Australians.

ACCAN welcomes the First Nations Community Wi-Fi Program (**the Program**) as an important step to closing the digital divide in remote and very remote communities.

Introduction

Free community Wi-Fi in remote and very remote First Nations communities is essential for addressing the digital divide and ensuring access to critical services. As illustrated in the Mapping the Digital Gap project's recent 2024 Outcomes Report, since 2022 there has been a 31% increase in First Nations peoples accessing the internet via Wi-Fi in public spaces.¹

ACCAN supports the Program as providing an initial step to supporting First Nations peoples in remote and very remote communities access to affordable broadband. We further recommend the Draft Guidelines should be founded on a capabilities-led approach that ensure investment reflect and provides for uplift in service capabilities as technology and community expectations change.² This will support the establishment of free community Wi-Fi that is sustainable and persists beyond the 7-year Operational Period outlined in the Draft Guidelines.

Recommendations - Draft Guidelines' amendments

Section 3 – Services and deliverables

ACCAN considers that Section 3.4. should be amended to (**changes in bold**):

Consultation with the relevant state, territory, and local governments is **required in addition** to First Nations community engagement. State, territory, and local governments may own infrastructure in areas that could potentially be used for Proposed Solutions or have work planned. They may also have specific requirements in relation to the use of their infrastructure that will need to be identified in the application.

ACCAN recommends this amendment to enhance transparency and ensure better alignment with the planning processes of state, territory, and local governments when delivering communications services and infrastructure. This amendment is designed to address the challenges experienced in the Mobile Black Spot Program, where 176 construction projects faced delays mainly due to the planning processes of local and state governments.³

Section 6 – What the grant money can be used for

ACCAN considers that Section 6.1. should be amended to (**changes in bold**):

- **provide** back-up power supply, which provides back up power for a minimum of 12 hours and, where technically feasible, for other Proposed Solutions, in the event of the loss of external power to the site.

¹ Daniel Featherstone, Lyndon Ormond-Parker, Sharon Parkinson, Kieran Hegarty, Leah Hawkins, Julian Thomas, Jenny Kennedy, Lucy Valenta and Lauren Ganley, *Mapping the Digital Gap: 2024 Outcomes Report* (Report, ARC Centre of Excellence for Automated Decision-Making and Society, 2024).

² See also, ACCAN, *2024 Regional Telecommunications Review* (Submission, Regional Telecommunications Independent Review Committee, 30 August 2024).

³ Communications Day, *FOI reveals 176 mobile blackspot builds delayed last year, largely by slow planning processes* (Media Release, Issue 6931, 1 August 2024) 1.

- **provide culturally appropriate** digital support in each community to support safe and effective access and connection to the Wi-Fi service and enhance digital literacy skills.

ACCAN recommends the Department explore supporting applications that facilitate 24-hour backup power solutions through Stand Alone Power Systems. This approach would enhance the resilience and reliability of communications infrastructure during power outages in remote and very remote communities. ACCAN stakeholders have consistently emphasised the critical need for reliable backup power systems, particularly in response to both natural and anthropogenic disasters, and advocate for the use of renewable energy sources such as solar and wind.⁴

ACCAN further recommends that providing culturally appropriate digital support in each community will be essential to the success of the Program and facilitating consumer trust in community Wi-Fi. This approach is particularly important considering in 2023 the telecommunications industry emerged as the most distrusted industry in Australia's economy and a history of telecommunications providers undertaking unconscionable conduct in First Nations communities.⁵

Section 7 – The assessment criteria

ACCAN considers that Section 7.1. should be amended to (**changes in bold**):

Culturally aware and inclusive: You must ensure that your communications and engagement methods are underpinned by an understanding of cultural factors. Culturally competent communication is necessary to build trust, promote empowerment and support the community in achieving the outcomes of the project.

Translation services should be used to ensure information about the Funded Project and its progress is as accessible as possible **in addition to the development of Easy English, plain English, braille, large print and Auslan resources.**

ACCAN suggests disseminating these resources via online channels, printed resources, and public service announcements to enhance support for First Nations communication consumers. ACCAN further suggests ensuring that these resources are available in the languages spoken in the community, including First Nations languages, as well as in formats like Easy English, plain English, braille, large print, and Auslan, if required.⁶

Furthermore, ACCAN recommends that funding be allocated to support the use of translation services and development of these resources in various accessible formats.

⁴ ACCAN, *2024 Regional Telecommunications Review* (Submission, Regional Telecommunications Independent Review Committee, 30 August 2024) 38.

⁵ Roy Morgan, *Telecommunications industry overtakes Social Media as the most distrusted industry* (Media Release, Article No. 9193, 4 April 2023); Australian Competition and Consumer Commission (ACCC), *Optus in court for alleged unconscionable sales and debt collection* (Media Release, ACCC, 31 October 2024); ACCC, *Telstra to pay \$50m penalty for unconscionable sales to Indigenous consumers* (Media Release, ACCC, 13 May 2021).

⁶ ACCAN, *2024 Regional Telecommunications Review* (Submission, Regional Telecommunications Independent Review Committee, 30 August 2024) 37.

Conclusion

ACCAN welcomes and supports the Program as a crucial initiative in closing the digital divide in remote and very remote First Nations communities.

ACCAN thanks 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 Dr Amelia Radke, Senior Policy Adviser, at amelia.radke@accan.org.au.

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.](#)
