

Submission

26 April 2024

The Standing Committee on Public Administration
Legislative Council
Parliament of Western Australia

Re: Inquiry into mobile telecommunication failure during widespread power outages in Western Australia

The Australian Communications Consumer Action Network (**ACCAN**) thanks the Standing Committee on Public Administration (**the Standing Committee**) for the opportunity to comment on the inquiry into regional telecommunications in Western Australia with a particular focus on mobile telecommunications failure during widespread power outages in Western Australia (**the Inquiry**).

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.

Communications are an essential service, and access to communications is critical, especially in times of an emergency. ACCAN recommends the Inquiry takes a holistic approach to preparing for mobile telecommunications failures during widespread power outages.

It is imperative that the government has a comprehensive response to support regional, rural, and remote (**RRR**) communities living in Western Australia (**WA**), as no communications technology is immune to power outages. To prepare for power outages that may result in a failure of mobile communications services, a proactive and coordinated response is necessary to support communities during disasters. We suggest the Standing Committee:

- Ensure adequate auxiliary backup power in areas prone to frequent power outages.
- Provide support for mobile roaming during a network outage.
- Develop educational resources that build the digital and connectivity literacy of RRR communities in WA.
- Develop resources to support small businesses maintain business continuity during power outages.
- Ensure emergency communications adequately support people with disability.
- Develop a strategic framework and plan for future development and investment in RRR communications in WA.
- Support equitable voice and data services that meet minimum service standards.
- Support the expansion of mobile coverage (both voice and data), along with increased capacity by improving data speeds.

For more detailed feedback on recommendations, see **Appendix A**.

ACCAN's submission was developed in consultation with an ACCAN individual member from WA, Isolated Childrens' Parents' Association WA, and the Western Australian Council of Social Services.

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

Yours sincerely,

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Senior Policy Adviser

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

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](#)

Appendix A

Auxiliary backup power in areas prone to power outages

ACCAN recommends that communities living in areas prone to frequent power outages should have access to 24 hours of auxiliary backup power through Stand Alone Power Systems (**SAPS**).¹ ACCAN suggests that SAPS can have a crucial role in ensuring the resilience and reliability of WA's telecommunications infrastructure by supporting communities to stay connected during power outages. This reflects ACCAN's previous submissions on the provision of SAPS in the Mobile Black Spot Program draft guidelines to support communities living in RRR WA by ensuring that they have access to backup power in the event of a power outage.²

While preparing this submission, ACCAN engaged with stakeholders, including organisations and community members in WA, and they shared the view that:

- Auxiliary backup power using a renewable energy source, such as solar and wind is important.
- Training should be provided to community members so that during a power outage they are not reliant on an electrician to come out to fix SAPS.³

Providing auxiliary backup power further aligns with the Australian Government's commitment to improving natural disaster resilience, which was highlighted during the Kimberley region's severe floods in January 2023.⁴

Mobile roaming during a network outage

Mobile services are important to the safety of communities during natural disasters and other emergencies. Governments across Australia are increasingly using mobile apps to communicate with consumers during natural disasters, including bushfires and floods. It is crucial that mobile networks have effective reliability and redundancy measures to ensure seamless connectivity for consumers during emergencies and unplanned network outages. To support better connectivity during times of disaster, ACCAN has previously recommended the use of domestic mobile roaming services in the event of a network outage.⁵

ACCAN stakeholders have raised concerns about the effectiveness of emergency warning messages sent via text by the Department of Fire and Emergency Services. They have noted that such messages need to consider the fact that people without mobile coverage will not receive the warning during a natural or anthropogenic disaster. Mobile roaming may help mitigate this issue.

¹ See, ACCAN, 'Regional Connectivity Program Round 3 (including Mobile Black Spot opportunities) Grant Opportunity Draft Guidelines' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 6 February 2023) 2.

² ACCAN, 'Mobile Black Spot Program improving Mobile Coverage Round Grant Opportunity Guidelines' (Submission to Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 28 November 2022) 2.

³ See also, James Purtill, 'Farmers are getting renewable Standalone Power Systems as Western Australia's regional power grid is dismantled' (*Who's gonna save us?*, 9 November 2022) <<https://www.abc.net.au/news/2022-10-02/thousands-of-renewable-standalone-power-systems-to-be-rolled-out/101479136>>.

⁴ See Prime Minister of Australia, 'Disaster Assistance for Kimberley Shire's Affected by Record-Breaking Flooding' (Media Release, 9 January 2023).

⁵ See, ACCAN, 'Better Delivery of Universal Services' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024) 15-16; ACCAN, 'Senate Inquiry on the Optus Network Outage' (Submission to the Senate Standing Committee on Environment and Communications, 21 November 2023).

Building connectivity and digital literacy in RRR WA

ACCAN supports the creation of educational resources for RRR communications consumers that outline how to stay connected during widespread power outages. ACCAN recommends the WA government work closely with retail service providers (**RSPs**), the Western Australian Community Resource Network (**WACRN**) and Community Resource Centres (**CRCs**), emergency management agencies, and community organisations to increase digital and connectivity literacy among RRR communities.⁶

ACCAN recommends developing educational materials that will inform consumers about the limitations of communication services and provide suggestions on how to remain connected during power outages. Furthermore, we recommend developing additional resources that provide information on any compensation available to small businesses and consumers affected by a power outage. Developing resources for small businesses is essential to supporting and maintaining business continuity during power outages.

To further support WA communications consumers, ACCAN recommends publishing the educational resources through online platforms, printed materials, and public service announcements. The resources should be translated into different languages used in WA, including First Nations languages. Furthermore, we recommend that information should be provided in a range of accessible formats including Easy English, plain English, braille, large print, and Auslan resources.

ACCAN's stakeholder engagement also noted the importance of adequate funding for CRCs and other organisations to develop educational resources for WA's diverse population. CRCs were identified as needing better funding to support their information and communication technology (**ICT**) connectivity so they can ensure that their clients stay connected.

Strengthening emergency communications for people with disability

ACCAN has heard from stakeholders from WA that messaging often fails to consider the accessibility of people with disability and the mobility limitation of many members of the public. Therefore, ACCAN suggests that the development of any educational materials and means of communication takes into consideration the needs of people with disability (in terms of accessibility of content), but also the need for targeted messaging for those with mobility limitations.

For example, if a person with disability requires assistance from a carer to evacuate a premise during an emergency, it may be advisable to leave at an earlier stage, rather than waiting for a general evacuation order. Furthermore, it is important to consider this when setting up and determining when evacuation sites open so that people with disability and those with mobility limitations have a safe site to relocate to if they evacuate at an early stage.

Strategic framework and plan for future development and investment in RRR communications

ACCAN recommends the WA government develop an investment and planning connectivity strategy for RRR areas. We suggest that this strategy should be developed in consultation with stakeholders

⁶ Connectivity literacy refers to the knowledge and skills necessary to connect to digital devices and broadband connections. It is distinct from digital literacy, which relates to the ability to navigate digital devices and the internet once the connection has been established effectively and confidently. See, Marshall, Amber, Hay, Rachel, Dale, Allan, Babacan, Hurriyet, and Dezuanni, Michael (2024) 'Connectivity Literacy for Digital Inclusion in Rural Australia'. In Radovanović, Danica (Ed.) *Digital Literacy and Inclusion: Stories, Platforms, Communities*. Springer, Cham, Switzerland, pp. 145-160. 146.

and prioritise future place-based investments based on the social, cultural, economic, and geographical needs of each community.

To achieve this, ACCAN recommends the WA government conduct an audit of connectivity infrastructure and provide funding for the development of a mapping tool. This tool should analyse existing infrastructure and identify gaps, allowing the WA government to strategically target investment in areas where it is most needed. ACCAN's stakeholders noted the importance of knowing the locations of populations who are particularly vulnerable to power outages in WA, such as older Australians and people with disability.

ACCAN recommends exploring opportunities to use a data-driven approach to enhance the selection of sites for upgrading the resilience of infrastructure and core resiliency in areas of high natural disaster risk. The WA government may consider using system-wide approaches like the System Average Interruption Frequency Index and the System Average Interruption Duration Index used in the Energy sector as examples of reliability data embedded in frameworks.⁷ This data-driven approach would support the WA government to enhance the economic and core resiliency of WA's telecommunications infrastructure effectively.⁸ ACCAN further recommends that any plan for future investment in RRR communications should adopt a technology-neutral approach that accounts for developments in emerging technology, such as low earth orbit satellites.⁹

Access to voice and data services that meet minimum service standards

It is vital that people have equitable access to data and voice services, no matter where they live. To meet the requirements of both consumers and businesses, ACCAN recommends the WA government advocates to the Australian Government to ensure that service performance is acceptable, maintenance is sufficient, and National Broadband Network connection problems are properly resolved.¹⁰

Expand mobile coverage (both voice and data)

Expansion of mobile voice and data coverage is still important. Although previous government initiatives have helped increase mobile coverage, there are still vast areas across WA with limited or no voice or data coverage. Moreover, there are even larger areas where data congestion is a major problem, leading to further limitations in utility. In RRR WA, the degradation of mobile broadband internet coverage and services due to congestion is a significant issue.¹¹

Stakeholder engagement has noted that major highways in WA need to be prioritised for mobile coverage to ensure the safety of road users. Therefore, ACCAN recommends the WA government investigate further opportunities, such as the Regional Connectivity Program and Mobile Black Spot Program, to support the expansion of mobile coverage on major highways.

⁷ SAIDI and SAIFI framework provides service reliability data on a "customers' average performance, assisting with identifying the areas of the network that need improvement, resulting in better customer type performance in clear customer segmentation." See, Energy Networks Association (ENA), 'ENA Service Standard Regulatory Policy and National Reliability Reporting Framework'. (ENA, 2006). 7; ACCAN, 'Mobile Network Hardening Program Round 2 Grant Opportunity Draft Guidelines' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 22 May 2023) 2.

⁸ ACCAN, 'Mobile Network Hardening Program Round 2 Grant Opportunity Draft Guidelines' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 22 May 2023) 2.

⁹ ACCAN, 'Better Delivery of Universal Services' (Submission to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 8 March 2024).

¹⁰ RRRCC, 'RRRCC Priorities for Action: Better Comms for the Bush' (PDF) <https://cottonaustralia.com.au/assets/general/PDF/RRRCC-Goals-and-Asks_2023_web.pdf>.

¹¹ Ibid.