



Digital Technology Hub – Consultation Paper

Submission by the Australian Communications Consumer Action
Network to the Department of Infrastructure, Transport, Regional
Development and Communications

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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.

Contact

Melyssa Troy
Media and Communications Officer

PO Box 639,
Broadway NSW, 2007
Email: info@accan.org.au
Phone: (02) 9288 4000
Fax: (02) 9288 4019
Contact us through the [National Relay Service](#)

Contents

1. General comments.....	4
2. List of recommendations	5
3. Responses to Digital Tech Hub consultation.....	6
3.1. What sources of information should be incorporated into the design of the Digital Tech Hub? 6	
3.2. What other existing networks can be used to promote the Digital Tech Hub?	7
3.3. What social media is most relevant to regional consumers?	8
3.4. What 3 to 4 hour window would best suit a limited-hours phone service, if implemented? 9	
3.1. For retail service providers: what kind of in-kind support can you provide for the Digital Tech Hub?	9
3.2. What information would be most useful to help small and medium businesses to maximise the benefits of digital connectivity?	10
3.3. What information would be most useful in assisting communities to undertake local digital planning?	10
3.4. What information would be most useful in assisting communities to prepare for, and best use digital connectivity during disaster and emergency situations?	11
3.5. What options are there to fund the operation of the Digital Tech Hub beyond its two year funding period, e.g. paid advertising?	12

1. General comments

ACCAN thanks the Department of Infrastructure, Transport, Regional Development and Communications for the opportunity to provide feedback on the design and implementation of an online Digital Technology Hub that aims to support regional, rural and remote Australians to make the most of telecommunications services.

In our submission to the 2018 Regional Telecommunications Review, ACCAN recommended that government articulate a policy vision for targeted strategies to support digital literacy in regional and remote Australia. The Digital Tech Hub, if correctly scoped and implemented, will provide a strong foundation for uplifting the digital literacy and capabilities of those outside metropolitan Australia.

2. List of recommendations

1. The Digital Tech Hub should primarily provide basic information on communications for regional, rural and remote consumers.
2. The Digital Tech Hub should include information on digital connectivity options that is tailored for regional, rural and remote consumers.
3. The Digital Tech Hub should leverage the work of existing organisations to avoid unnecessary duplication of information, and build on their knowledge and experience.
4. Information on the Digital Tech Hub must be presented in plain language without jargon.
5. Information on the Digital Tech Hub should be accessible for all.
6. The Digital Tech Hub should use a comprehensive communications approach that includes leveraging existing networks to promote the platform.
7. The Digital Tech Hub should be promoted to consumers through both offline and online channels.
8. Facebook should be used as the primary social media platform for promotion of the Digital Tech Hub.
9. To accommodate consumers that are not on Facebook, an online chat option should also be available through the Digital Tech Hub website.
10. The hours of operation of a limited-hours phone service must account for varied time zones. For example, 6PM AEST – 10PM AEST / 4.30PM CST – 8.30PM CST / 3PM AWST – 7PM AWST.
11. The Digital Tech Hub should provide easily comprehensible information about digital connectivity and the positive business impacts for small and medium businesses.
12. The Digital Tech Hub should include information regarding the Digital Transformation Agency's Digital Service Standard.
13. The Digital Tech Hub should synthesise information from RSPs , NBN Co and government authorities to provide consumers with a clear understanding of what they should do to prepare for an emergency or disaster situation and what back-up options may be needed.
14. Information about assistance packages from RSPs should be published on the Digital Tech Hub as available.
15. The Digital Tech Hub should not solicit paid advertising from external parties, and should continue to be publically funded.

3. Responses to Digital Tech Hub consultation

3.1. What sources of information should be incorporated into the design of the Digital Tech Hub?

Regional, rural and remote Australians are not a homogenous group.

When considering sources of information that should be incorporated into the design of the Digital Tech Hub, the Department must acknowledge and understand that the end users of this service will vary in their digital confidence and capabilities. Factors including age and geographic location will impact consumers' level of digital engagement and therefore the information they will require from the Digital Tech Hub.

Generally, there is still a strong disparity in the digital abilities of those living in country areas compared to capital cities¹. This skill gap widens for older regional Australians as they are more likely to be digitally disengaged and have low digital literacy than their metropolitan counterparts². To better inform this group of consumers, the information available on the Digital Tech Hub should focus on basic consumer education topics such as how to choose a broadband plan and the benefits of being digitally connected.

Communications consumers in regional, rural and remote communities commonly rely on more specialised technology than those in major cities, such as booster antennas or satellite connections. Information on the Digital Tech Hub must reflect the broad communications needs of these communities and provide technologically relevant advice regarding getting connected, troubleshooting problems, and consumer rights.

The Digital Tech Hub should leverage the work of existing well-recognised organisations to avoid unnecessary duplication of information and to provide regional, rural and remote consumers with a singular, trusted destination for their communications questions.

Resources on the Digital Tech Hub should be produced by organisations with a history of sustained consumer engagement, especially with regional communities. Such organisations have a deep understanding of the ways regional consumers use their phone and internet services at home, at work and on the move. This understanding will be crucial to the successful curation of a fit for purpose resource.³

Information on the Digital Tech Hubs must be presented in plain language without jargon and should include information in accessible formats; this includes publishing content in languages other than English, producing Auslan videos and creating Easy English versions of materials.

¹ Thomas, J, Barraket, J, Wilson, CK, Rennie, E, Ewing, S, MacDonald, T, 2019, Measuring Australia's Digital Divide: The Australian Digital Inclusion Index 2019, RMIT University and Swinburne University of Technology, Melbourne

² Office of the eSafety Commissioner, 2017, Understanding digital behaviour amongst adults aged 50 years and over

³ Sora Park, Julie Freeman & Catherine Middleton, 2019, Intersections between connectivity and digital inclusion in rural communities, Communication Research and Practice, 5:2, 139-155

Recommendation 1: The Digital Tech Hub should primarily provide basic information on communications for regional, rural and remote consumers.

Recommendation 2: The Digital Tech Hub should include information on digital connectivity options that is tailored for regional, rural and remote consumers.

Recommendation 3: The Digital Tech Hub should leverage the work of existing organisations to avoid unnecessary duplication of information, and build on their knowledge and experience.

Recommendation 4: Information on the Digital Tech Hub must be presented in plain language without jargon.

Recommendation 5: Information on the Digital Tech Hub should be accessible for all.

3.2. What other existing networks can be used to promote the Digital Tech Hub?

ACCAN supports a comprehensive communications approach that includes leveraging existing networks to promote the Digital Tech Hub. As a member of the Regional, Rural and Remote Communications Coalition (RRRCC), ACCAN is acutely aware of the important role that organisational networks play in communicating information to these communities.

In addition the ACCAN and RRRCC networks, to most effectively capture a full cross-section of the various target groups, organisational networks should be segmented by audience. For example, older people, women's groups, Indigenous community organisations.

Recommendation 6: The Digital Tech Hub should utilise a comprehensive communications approach that includes leveraging existing networks to promote the platform.

Beyond stakeholder engagement, the communications plan should also include additional communications channels that will engage consumers both offline and online. Consideration should be given to attracting consumers who are actively engaged in learning more about digital technologies as well as those who are digitally disengaged.

For many regional Australians, traditional media sources (such as TV and newspapers) remain the primary source of news and information⁴. These sources of information also have significantly higher

⁴ P. Fray & C. Giotis (Eds.), 2019, Regional News Media: State of Play, Centre for Media Transition, University of Technology Sydney: Sydney, Australia

levels of trust from regional Australians than social media channels⁵ so will be an important part of a marketing communications plan.

Recommendation 7: The Digital Tech Hub should be promoted to consumers through both offline and online channels.

3.3. What social media is most relevant to regional consumers?

Among regional consumers who use social media, the most popular platforms include Facebook (94%) YouTube (46%), and Instagram (29%)⁶. At least 15% of people in regional areas never use social media sites, compared to 10% in metro areas⁷.

Due to its popularity amongst the target audience, ACCAN recommends that Facebook should be used as the primary social media platform for promotion of the Digital Tech Hub. Its private messaging function (Messenger) would also allow consumers to directly contact the Digital Tech Hub team with questions.

To accommodate consumers that are not on Facebook, an online chat option should also be available through the Digital Tech Hub website.

Benchmarks for response times to live chat enquiries should be established as part of the tender process to ensure that consumer enquiries are dealt with in a timely manner.

To manage consumer expectations, the Digital Tech Hub should be transparent about its hours of operation and the scope of assistance that Digital Tech Hub staff are able to provide.

While the Digital Tech Hub should consider YouTube as a platform for hosting consumer education videos, access may be restricted as many regional, rural and remote Australians have limited data allowances on both mobile and fixed line broadband services.

The successful provider of the Digital Tech Hub must be fully aware of the reality of communications services in regional, rural and remote areas. This would need to be properly demonstrated by the successful tenderer.

Recommendation 8: Facebook should be used as the primary social media platform for promotion of the Digital Tech Hub.

⁵ Australian Communications and Media Authority, 2017, Regional Australians' access to local content - Community research

⁶ Sensis, 2018, Yellow Social Media Report 2018 – Consumer

⁷ Sensis, 2018, Yellow Social Media Report 2018 – Consumer

Recommendation 9: To accommodate consumers that are not on Facebook, an online chat option should also be available through the Digital Tech Hub website.

3.4. What 3 to 4 hour window would best suit a limited-hours phone service, if implemented?

There are numerous factors that must be considered in exploring a suitable three to four hour window for a limited-hours phone service.

Many regional Australians are employed in agricultural businesses⁸ that take them out and about during the working day. This means that the Digital Tech Hub must be able to accommodate calls either early in the morning or later in evening to suit consumer availability.

Another key issue is the geographic spread of Australia's regions and the various time-zones that are in place across the nation.

For six months of the year, the country has three time zones: Eastern Standard Time (Queensland, New South Wales [except Broken Hill], Victoria, Tasmania, Australian Capital Territory), Australian Central Standard Time (South Australia, Northern Territory and the town of Broken Hill in western New South Wales), and Australian Western Standard Time (Western Australia). However, during the warmer months, this extends to five time zones as Queensland, the Northern Territory, and Western Australia do not observe daylight saving⁹.

If the limited-hours phone service is to be operated during one 3 to 4 hour window, careful consideration will need to be given as to how to accommodate these different time zones. One potential option for hours of operation could include: 6PM AEST – 10PM AEST / 4.30PM CST – 8.30PM CST / 3PM AWST – 7PM AWST.

Given the limited budget available under the program, careful consideration will need to be given to the viability of a phone service option within the current funding envelope.

Recommendation 10: The hours of operation of a limited-hours phone service must account for varied time zones. For example, 6PM AEST – 10PM AEST / 4.30PM CST – 8.30PM CST / 3PM AWST – 7PM AWST.

3.1. For retail service providers: what kind of in-kind support can you provide for the Digital Tech Hub?

N/A

⁸ Australian Bureau of Statistics, 2016, Census of Population and Housing

⁹ <https://www.australia.gov.au/about-australia/facts-and-figures/time-zones-and-daylight-saving>

3.2. What information would be most useful to help small and medium businesses to maximise the benefits of digital connectivity?

There is an acknowledged lack of awareness regarding digital adoption from small and medium businesses¹⁰. The most common issues are unfamiliarity with available technologies and uncertainty as to how to evaluate which digital connectivity options will be most beneficial to their business.

Small and medium businesses would benefit from having simple, easy to comprehend information about the types of digital applications available (such as cloud software, e-commerce capabilities, etc.) and how they can respectively lead to positive impacts for their operations.

The Digital Tech Hub should aim to educate small and medium businesses about how to compare common business-orientated plans for communications services such as NBN Business plans, Sky Muster Plus, mobile plans and Internet of Things Data SIM plans. Budget limitations mean that the Digital Tech Hub may struggle to regularly update lists of available plans on the market, so it is important that small and medium businesses have the foundational knowledge needed to make their own comparisons.

Information about more complex aspects of connectivity, such as Internet of Things, should be kept to a minimum. There is insufficient existing reputable material on these matters that is specifically targeted at small and medium businesses. The Digital Tech Hub would need to produce its own materials on this extensive area of technology, which would be outside of scope and budget.

Recommendation 11: The Digital Tech Hub should provide easily comprehensible information about digital connectivity and the positive business impacts for small and medium businesses. What information would be most useful in assisting communities to undertake local digital planning?

3.3. What information would be most useful in assisting communities to undertake local digital planning?

The national peak body for local government, the Australian Local Government Association (ALGA), has identified a need for digital transformation to improve productivity and services to communities¹¹.

In an effort to assist in the designing and delivering of government services the Digital Transformation Agency has created the Digital Service Standard¹². Compliance with the Standard is not compulsory for local councils, however they may apply it improve their service delivery.

¹⁰ Small Business Digital Taskforce, 2018, Report to Government

¹¹ Australian Local Government Association, 2017, 2017-20 Strategic Plan

¹² <https://www.dta.gov.au/help-and-advice/about-digital-service-standard>

At a minimum, the Digital Tech Hub should include information about the 13 criteria set by the standard to help design and deliver government services. It should also reference the Digital Transformation Agency's guides to building and improving digital services.

Recommendation 12: The Digital Tech Hub should include information regarding the Digital Transformation Agency's Digital Service Standard.

3.4. What information would be most useful in assisting communities to prepare for, and best use digital connectivity during disaster and emergency situations?

Preparation

Information about communications services during disasters and emergencies is currently spread across multiple sources, including RSPs, NBN Co and government authorities like the ACMA. ACCAN recommends that the Digital Tech Hub synthesise this information to provide consumers with a clear understanding of what they should do to prepare for an emergency or disaster situation.

One of the most pressing issues is the reliability of telecommunications services during emergencies; as the NBN roll-out nears completion, consumers need to understand that most NBN services will not work during a power outage. Although reliance on fixed-line phone services has continually declined across Australia¹³, for many regional, rural and remote consumers the traditional landline is a lifeline in emergencies¹⁴. Consumers should be advised to have an emergency communications kit that includes a fully charged mobile phone, a charged power bank, and a battery powered radio.

Response

Information about any dedicated helplines established by RSPs or government bodies should be easily accessible on the Digital Tech Hub webpage.

Should the Digital Tech Hub move forward with a live chat option or limited call centre, these channels must also be prepared for emergency situations. This includes having adequate resourcing to accommodate an increase in enquiries at short notice. Consumer contacts may also provide information on outages or issues that can be passed along to RSPs and infrastructure providers to aid in their recovery efforts.

Recovery

After an emergency has passed, consumers will require information about the assistance packages available from RSPs and government bodies.

¹³ Australian Communications and Media Authority, Communications report 2017–18, 2019

¹⁴ Australian Government, 2018 Regional Telecommunications Review - Getting it right out there, 2018

Recommendation 13: The Digital Tech Hub should synthesise information from RSPs NBN Co and government authorities to provide consumers with a clear understanding of what they should do to prepare for an emergency or disaster situation.

Recommendation 14: Consumers should be informed about the reliability of communications service during emergencies and back-up options.

Recommendation 15: Information about assistance packages from RSPs should be published on the Digital Tech Hub as available.

3.5. What options are there to fund the operation of the Digital Tech Hub beyond its two year funding period, e.g. paid advertising?

To be a valuable resource to regional, rural and remote Australians, the Digital Tech Hub must be a dynamic and evolving platform. If it is not appropriately updated with timely and relevant information, there will be no value to consumers and it will fail to provide a return on investment.

In order to build a reputation as a trusted source of information, the Digital Tech Hub must prioritise its independence above all. ACCAN therefore does not support paid advertising as a revenue source, as it could compromise the independence and integrity of the Hub.

As the Hub will be a valuable resource for the community, there are strong grounds for continued public investment beyond the modest seed funding commitment in the Regional Connectivity Program. Savings to government in delivering services online are significant, and the Hub should be regarded as an investment that supports this outcome in return. The funds required to maintain the Hub will be relatively modest, with limited budgetary impact.

Recommendation 16: The Digital Tech Hub should not solicit paid advertising from external parties, and should continue to be publically funded.