

**COMMUNICATIONS
ALLIANCE LTD**



Digital Technology Hub – Consultation Paper
COMMUNICATIONS ALLIANCE SUBMISSION
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CONTENTS

INTRODUCTION	2
SCOPE AND CONTENTS	2
Scope	2
Contents	2
Question 1: What sources of information should be incorporated into the design of the Digital Tech Hub?	3
Question 8: What information would be most useful in assisting communities to prepare for, and best use digital connectivity during disaster and emergency situations?	5
STRUCTURE AND FUTURE	6
Question 9: What options are there to fund the operation of the Digital Tech Hub beyond its two-year funding period, e.g. paid advertising?	7
INDUSTRY SUPPORT	7
Question 5: For retail service providers: what kind of in-kind support can you provide for the Digital Tech Hub?	7

About Communications Alliance

Communications Alliance is the primary telecommunications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to provide a unified voice for the telecommunications industry and to lead it into the next generation of converging networks, technologies and services. The prime mission of Communications Alliance is to promote the growth of the Australian communications industry and the protection of consumer interests by fostering the highest standards of business ethics and behaviour through industry self-governance. For more details about Communications Alliance, see <http://www.commsalliance.com.au>.

INTRODUCTION

Communications Alliance welcomes the opportunity to provide this submission in response to the Department's consultation on the Digital Technology Hub. We strongly support the intention to help regional, rural, and remote consumers to get connected, stay connected, and make use of telecommunications and related technologies.

We understand that this consultation is a first step in the creation of the Hub, and offer our comments in that light; noting that we look forward to further consultation and conversations with the Department and other stakeholders as the concept progresses.

On the whole, the Australian government, and a number of not-for-profits, have put significant work into developing and maintaining useful resources to help Australians get connected and safely navigate the online world. It is important that the funding for the Hub is used to either provide information not already in existence, or provide clear and easy access to existing data and resources, to avoid duplicating previous efforts.

Our submission addresses the questions on which industry can offer useful input. Some of the questions touch on areas on which groups such as ACCAN, National Farmer's Federation, COSBOA, and the Country Women's Association are more appropriately placed to comment. We recommend the Department consider their submissions – noting that we have not, as yet, sighted those organisations' submissions (if any) to this consultation and thus cannot formally endorse or recommend their suggestions.

SCOPE AND CONTENTS

Scope

Appropriately scoping the Hub is important to ensure its utility to consumers and longevity (see section on "[Structure and Future](#)").

The consultation paper does state the objective of the Hub is specifically to provide information and support to regional, rural and remote Australians. The topics and types of information mentioned are, however, applicable to many, if not all, Australian telecommunications consumers. It will be important to clarify the scope – both when developing and gathering information, and as stated on the Hub itself, once launched. This will help prevent potential overlap, duplication, or confusion.

For topics that apply across all consumers, it will likely be more appropriate to provide links to that information hosted elsewhere – such as information on the ACMA and TIO's websites about complaints, or provided by the eSafety Commissioner on digital literacy.

This will allow the Hub to focus on the specific challenges faced by rural, regional, and remote consumers, while still providing them a straightforward path to more broadly applicable information.

Scoping the activities of the Hub – in addition to the information provided – is also important. We support the Department's example that "staff would not contact RSP on behalf of a consumer, but would provide consumers with information to facilitate contact with an RSP." While RSP websites must provide contact information, we recognise that it may be helpful to also have a central point to help consumers find that information, determine what questions they may have for their RSP, or confirm that it is the RSP and not nbn that a consumer should contact.

Contents

Our understanding from reviewing the RTIRC submissions on this topic is that a key need is the provision of information on the unique technical issues or needs of rural, regional, or remote consumers. This could include, for example, information about equipment that will enhance

service reception, or specific information on NBN services delivered over Sky Muster or Fixed Wireless.

There is already extensive and excellent information available to consumers on these topics, and we agree with the goal to "make use of existing content where possible." While there are certainly opportunities to better reach consumers with the existing information, with the fast pace of change and resources which have already gone into developing educational and informative materials, the Hub's best use of resources will be to organise and provide easy access to this information.

Making use of already existing information by linking to it (thus allowing it to be maintained and updated over time, by the original sources of that information) will also help ensure the Hub stays up to date, and does not in the future become an outdated source of confusing information.

While a simple list of links may not be the best use of resources, creating a well-organised and easily accessible method to find the information a consumer needs would be a significant and useful task.

Many of these resources are identified in the list below, and Communications Alliance would gladly work with the Department or the appointed Hub provider to find more resources on specific topics if and when needed.

Question 1: What sources of information should be incorporated into the design of the Digital Tech Hub?

We have provided some initial ideas of key sources of information that could be linked to, separated into categories applicable to all consumers and those specifically useful to rural, regional and remote customers.

However, the key focus should be on encouraging a customer to contact their RSP. Each RSP will have key information – particularly technical and troubleshooting information – available for their customers and relevant to the network that the customer is using. Considering that any technical information could be regularly updated depending on an RSP's provisioning or operational processes, and that an RSP will have specific information for that customer's service, it is important that the Hub clarify that the RSP should always be the customer's first touchpoint when any problems or questions arise about their service.

Some have specific websites dedicated to regional services (for example: <https://www.telstra.com.au/regional-services>, <https://www.optus.com.au/about/network/regional-coverage>), while other may focus on services for remote areas such as satellite (<https://www.pivotel.com.au/solutions/consumer/satellite-phones/>). It may be worth considering if the Hub should include a link to the relevant "contact" or other pages for RSPs serving rural, regional, and remote Australia – noting however, that due to the nature of the telecommunications market, it will be nearly impossible to ensure that every RSP is listed, thus the importance of encouraging customers to directly contact their RSP. The Telecommunications Industry Ombudsman (TIO) hosts a list of contact information for all of their current members which could be linked to in case a customer is having trouble locating that information: <https://www.tio.com.au/who-we-work-with>

All consumers:

- Customer Service and Complaints:
 - The ACMA provides detailed information on complaining directly to your RSP or contacting the TIO: <https://www.acma.gov.au/telco-complaints-and-problems>, and a broader resource on telco customer rights: <https://www.acma.gov.au/your-rights-telco-customer>

- The TIO has developed guides on a range of topics which are helpful to consumers, including before reaching the stage of submitting a complaint: <https://www.tio.com.au/help>, and clearly describes the process for progressing a complaint through the TIO: <https://www.tio.com.au/making-a-complaint>
- Technology:
 - [Broadband Education Package, Communications Alliance](#): This is a simple overview of the technologies, speeds, data needs and other key information about home broadband on Communications Alliance's website, which is also required to be included in or linked to from Critical Information Summaries. We note that it is currently undergoing revision and will be updated in early March 2020.
- Digital Literacy: The Office of the eSafety Commissioner has a plethora of information available for a range of Australians. Two specific projects are listed here, and more broadly, if it is identified that further specific resources need to be developed on this topic, we strongly recommend that be done in conjunction with the Office of the eSafety Commissioner.
 - Be Connected, is a key resource to increase digital literacy. While it was designed "to increase the confidence, skills and online safety of older Australians," it provides tools and information that are useful for anyone looking to increase their digital literacy: <https://beconnected.esafety.gov.au/>
 - Your Online Journey app was developed to assist all Australians, but particularly those in remote Indigenous communities: <https://www.esafety.gov.au/about-us/newsroom/your-online-journey-app-launched-improve-indigenous-digital-literacy-and-online-safety>
- ACCAN: ACCAN and its members develop guides, tip sheets, and other information for consumers on a regular basis. As we are aware that ACCAN will be making a submission to this consultation, we trust they will comment on which of those resources they consider to be relevant for the Hub.

Information specifically for rural, regional, and remote consumers:

- nbn: nbn's website includes information on underlying technologies for all services delivered over the NBN. They have a page dedicated to regional and remote Australia: <https://www.nbnco.com.au/learn/regional>, in addition to information on specific technologies such as Sky Muster and Fixed Wireless, including:
 - Explaining Sky Muster satellite: <https://www.nbnco.com.au/learn/network-technology/sky-muster-explained>
 - List of Sky Muster providers: <https://www.nbnco.com.au/connect-home-or-business/check-your-address/choose-a-provider-sky-muster>
 - Fixed Wireless Explained: <https://www.nbnco.com.au/learn/network-technology/fixed-wireless-explained>
- AgTech Finder: The Food Agility CRC – in combination with key organisations such as the National Farmers' Federation - has already developed the AgTech Finder (<https://agtechfinder.com>), a dedicated resource on this topic. Considering the breadth and fast evolution of IOT applications to agribusiness, it would not be appropriate to duplicate the information, but instead provide a link to the website.
- Comparison sites: There are some established and widely recognised comparison hubs with information on telecommunications providers and plans. While these are relevant to all telecommunications consumers, many have the ability to filter by

access technology. These comparator sites regularly update their information, and are monitored by the ACCC.

Due to a range of factors – the significant resources required to maintain this information, the possibility of creating confusion by adding yet another similar site into the market, and the established availability of this information – the Hub's key value-add could be to provide a basic list of comparator websites, including a note on if they offer the ability to search by technology (i.e. for customers who can only access an NBN service over Sky Muster, or for customers who still have copper PSTN connections). This would provide consumers with an easy resource to access information on choosing their provider. Some of these sites are as follows (this is not an endorsement of any specific site):

- Choice
- Canstar Blue
- WhistleOut
- Finder

Question 8: What information would be most useful in assisting communities to prepare for, and best use digital connectivity during disaster and emergency situations?

It is important to note the difference between providing information for preparation, and up-to-date information during a disaster or emergency situation. We understand the consultation to be asking about information for preparation, and thus that is what we are providing here.

Considering the importance of getting this information right, our submission is **only** touching on the topics that should be covered, and not the specific content to include under each topic.

Once a third-party provider is appointed for the Hub, Communications Alliance would strongly encourage them to engage with our Communications Resilience Admin Industry Group (CRAIG), who focuses on the resilience of telecommunications infrastructure, including in the event of disasters or emergencies, and could provide or coordinate the collection of more detailed information on these topics.

For initial background, there are already some extensive resources available on this topic, including:

- <https://amta.org.au/be-prepared-natural-disasters-and-emergencies/>
- <https://exchange.telstra.com.au/preparing-for-australias-summer-disaster-season/>

The types of information which should be covered include:

Mobile network coverage and Triple Zero

It is important to inform Australians that if they need to contact Triple Zero but their mobile phone does not show coverage, they should try regardless, as if the call will be carried on any available mobile network. The ACMA has further information on dialling Triple Zero: <https://www.acma.gov.au/emergency-calls>

Emergency Alerts

While many in the community have a general understanding of the Emergency Alert capability, reference to its functionality can be found here: <http://www.emergencyalert.gov.au/>.

Of particular note for the target audience is that in an NBN environment local number alerts will only be received where the telecommunications device has access to power at the customers premises and for some types of NBN services power is required at other points in the communications path (e.g. at the Node for FTTN – see further comments on electricity requirements below).

A particular call out for mobile location-based alerts is that unlike an emergency call, an emergency alert can only be received where the mobile device is connected to its home/main mobile network via a mobile base station (otherwise known as a cell site), which also rely on electricity.

Natural Disasters

Reliance on electricity

The impact of an electricity supply failure on communications service availability is complex, as the severity of impact is dependent on the length of the power outage, the back-up power source in place and the availability of other functioning communication alternatives.

Mobile networks: Electricity, network coverage and availability are critical for the basic functions of the mobile network. Customers should be aware that even if their home still has power, it is possible the mobile infrastructure will have lost power.

Fixed line technology: This will not necessarily work in a power outage, as discussed in these resources:

- <https://www.nbnco.com.au/learn/what-happens-in-a-power-blackout>
- <https://www.telstra.com.au/support/category/home-phone/phone-line/can-i-use-my-home-phone-on-the-nbn-during-a-power-outage>

Reconnection

Each state and territory has its own critical infrastructure program and emergency management plans. It may be useful to provide state-by-state information on these topics.

Network specific information

Some network providers may have specific information which could be linked to. For example, nbn recently published the following on their approach to emergency management: <https://www.nbnco.com.au/blog/the-nbn-project/vigilance-never-sleeps-nbn-cos-approach-to-emergency-management>, and Optus lists any ongoing or previous Mass Service Disruptions: <https://www.optus.com.au/notices/mass-service-disruptions>.

Complaints and Assistance

In the case of a natural disaster, many RSPs will set up dedicated contact lines or assistance for impacted customers. If customers are not already aware of this assistance, they should ask their RSP if it is available.

Additionally, the TIO has set up a dedicated Natural Disasters phone line if an impacted customer has an unresolved complaint with their RSP: <https://www.tio.com.au/reports-updates/information-bushfire-affected-consumers>

STRUCTURE AND FUTURE

The resources dedicated to the Hub should be used efficiently and in a way that ensures it is a resource with continuing availability in coming years. To encourage this, it should be initially set up in the most sustainable way possible.

One factor which will impact its sustainability is the designated third-party provider. We understand the Department will have a range of criteria which must be satisfied in any request for tender, but we recommend considering the benefits of appointing an existing organisation, potentially one already connected to this topic (for example, telecommunications-specific consumer organisations, not-for-profits such as the Telco Together Foundation, or websites/groups such as Choice – noting that none of these organisations have suggested they may be interested, simply that they are existing structures which come to mind).

Additionally, structuring the resource in a way which relies upon information already created and maintained by third parties as discussed under "[Scope and Contents](#)" would significantly minimise the annual/ongoing costs to maintain the Hub.

Finally, we recommend the Department carefully examine the likely staffing and other Opex requirements, in light of the scope of the Hub. It may well be, for example, that the original funding appropriated (...[confidential]...) could instead be used over three, four or five years to ensure the Hub is fully established and communities have had the opportunity to make use of it over a longer period of time before future funding needs to be considered.

Question 9: What options are there to fund the operation of the Digital Tech Hub beyond its two-year funding period, e.g. paid advertising?

Per our above comments, if appropriately set up, ongoing up-keep past initial design should be reasonable. However, we do not consider that paid advertising or an industry levy would be appropriate for this funding. Ultimately, we recommend that there be a review of the Hub's utility to consumers after the first round of funding before making decisions on future funding.

INDUSTRY SUPPORT

As the industry body, Communications Alliance can assist with gathering information from members on what similar resources they currently offer and how those can best be linked to from the Hub.

As identified under the question on disaster and emergency situations, we can organise for the Hub provider to meet with the CRAIG to discuss disaster management protocols. We can also organise a regular (potentially quarterly or bi-annually) meeting with our [Industry Consumer Advisory Group \(ICAG\)](#) as an industry liaison point.

We would also be open to organising education for Hub staff on a range of topics, including telecommunications regulation, technologies, and customer service processes, both by Communications Alliance staff and potentially directly with member RSPs.

Question 5: For retail service providers: what kind of in-kind support can you provide for the Digital Tech Hub?

As to resources provided directly by individual RSPs, this question may be best answered as the formation of the Hub continues and specific needs are identified.

Additionally, we recommend the Department reach out to the Telco Together Foundation to further discuss this question. Their [Industry Impact Hub](#) "brings the telecommunications industry together to establish collaborative industry approaches to issues confronting our community," and could be a path to coordinate RSP in-kind support for the Hub.



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