COMMUNICATIONS ALLIANCE LTD

Regional Data Hub: Understanding and responding to regional data needs

COMMUNICATIONS ALLIANCE SUBMISSION

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INTRODUCTION

Communications Alliance welcomes the opportunity to provide this submission in response to The Department of Infrastructure, Transport, Regional Development and Communications' (the Department) consultation paper on the proposed Regional Data Hub.

We have provided some initial thoughts in response to the questions posed in the paper. However, we note that the the 2021 Regional Telecommunications Review (RTIRC) is underway, and consider the discussions and submissions to that process may provide an opportunity for the Department to gather further detailed input regarding telecommunications data availability and needs as it relates to the regions.

Communications Alliance and its members would also be pleased to have further discussions on the Hub as it is developed.

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.

DATA USAGE

In this section, we have answered the questions posed by the paper in regards to telecommunications providers as 'data users' – the types of data, sources and formats.

What are the major types of data (e.g. economic, social, industry, demographic) that you use?

To note, in our response to this question we have also addressed types of data we would be interested in using.

Telecommunications providers can and do use demographic, societal and communications data to understand customer trends, network trends, and the impact of connectivity on the economy. This includes:

- Tourism data
- Migration trends (for example, house purchases and sales, ratepayer numbers and rentals data)
- Breakdowns by industry in each Local Government Area (LGA)
- School and education statistics
- Emergency callouts
- Weather data

Are there particular sources (e.g. government) that you would prefer to receive data from?

Providers currently use data from the ABS, Government departments, regulators, industries, and 3rd parties. We would like to continue receiving data from these sources and others.

Would you like to access data by a particular area or location? Examples are by local government area, Indigenous Regions or the Australian Statistical Geography Standard (ASGS).

All of these boundary types are useful in different circumstances. However, it would be ideal if data was available at an ABS mesh block level in a geospatial format, where relevant.

What other information could be included in the Hub, including for release as regular Hub products?

Some initial thoughts are as follows:

- Population movement data (trends and forecasting)
- Council and government infrastructure and town planning
- Land use e.g. type of farm
- Location of public interest premises e.g. police stations, universities, libraries, fire stations, indigenous arts centres, medical centres and clinics, etc.
- Education levels
- Financial profiles
- Safe areas during extreme weather
- Date relating to power outage affected areas
- Industry body operating areas e.g. Northern Lands Council, APY Lands

Ideas for and about telco specific data are discussed in the section on Data Sharing.

How do you want to access data?

While maps are very helpful for geographic analysis, and quick access to key facts can be useful for referencing, ultimately full access to downloadable data files has the most flexibility and utility as it allows parties to run their own statistical analysis.

Specifically, cross-platform API is of interest, as well as event triggered alerts and push notifications e.g. to end user devices in case of weather or outage events.

If data sets need to be re-formatted in any way, the Hub needs to take on that task instead of putting that requirement on data providers (see next section for further thoughts on the need to avoid regulatory imposition).

DATA SHARING

What regional data do you hold?

Telecommunications providers hold data on the availability of networks and connectivity across Australia. These include:

- Fixed Wireless, ADSL, 3G, 4G, 5G and satellite coverage maps from all telcos and private providers

- RSP insights by premises e.g. quality of service, services available, services in use

- Network towers and infrastructure from all providers

Much of this data is already available in a variety of ways, such as nbn's roll-out map and coverage maps published by each Mobile Network Operator. On this topic, the Department would also have extensive data collected via the Mobile Blackspot Program.

Telco providers have extensive data provision requirements from regulators and Government departments. We strongly encourage the Department to ensure this program does not create any additional requirements on industry, but instead to work across all regulators and government bodies to collect data from them.

Some examples of government-held telecommunications data (in addition to the aforementioned data collected in relation to the Mobile Blackspot Program) are:

- The ACMA's Register of Radiocommunications Licences includes spectrum holdings across the country.

- Australian Digital Inclusion Index

- Dial Before You Dig data for utilities and other telcos

nbn specific data

nbn has provided some insights into data specific to them as an organisation.

In rolling out the network, nbn has produced, developed and continues to maintain data about addresses and locations Australia-wide and the activation status of areas within regional Australia.

nbn has developed data about nbn network assets and their location as well as information

on new development planning activities.

Non personal, de-identified network consumption patterns are also captured by nbn, aggregated at a mesh block level (or alternative boundary level).

nbn also has access to insights about network adoption including the use of high-speed tiers in regional areas which can act as a proxy for understanding digitally driven businesses.

nbn has developed aggregated insights relating to inferred work from home patterns and tree change / sea change patterns and insights for areas.

What are the greatest barriers to sharing data (either your own or other data) and how can these be overcome?

Current challenges in sharing data – specifically in response to regulatory requirements - include requirements to use the MyGov system for identify verification and online uploads. When providing data, large organisations often need to compile that data (in, for example, a spreadsheet) and send internally for verification. Adding a step to manually type data into an online form not only takes additional time, but introduces the risk of human error during that transcription.

Another challenge is when requests for data sets do not align with the type of data collected, or the categorisation or formatting of such data. We always encourage regulators to have initial conversations with regulated entities to discuss exactly what form of data is available before proceeding to the step of a data request. While we understand (and fully support) that this program is not intended to have mandatory data requests, we encourage the Department to have targeted conversations with each data provider once there is a clearer idea of the type of data being looked for. This will allow the design of the hub to closely align with existing data.

Finally, all companies will have a range of regulatory, contractual, internal policies (such as ethics policies) and privacy obligations that will impact their abilities to share data.

Overall, all data made available in a platform must undergo robust internal review processes to ensure all risks are managed and obligations are met.

Emergency data and National Security Interests

Telecommunications providers have been working closely with States and Territories, emergency services and energy providers to coordinate on data needed to respond to emergencies such as bushfires. These arrangements are set out in the Communications Alliance Telecommunications – Facilities Information Sharing Industry Guideline (G665:2021). However, this data is not appropriate for the proposed Hub as it is both real-time and relates to Critical Infrastructure, therefore national security considerations must be taken into account.

Communications Alliance's Communications Resilience Administration Industry Group would be pleased to discuss this matter further with the Department if needed.

What would be the benefits of greater data sharing for you or your organisation?

Greater visibility of telecommunications and connectivity data may lead to better visibility of networks and drive further activity to connect. It could also raise awareness of network capability.

Combining this data with new (or more easily accessed) other data could provide new insights and opportunities to help lift the digital capability of Australia by driving innovation through automation and data-led events.

Additional data could also help telecommunications providers better support end-customers through improved awareness of connectivity availability and events which may impact networks.