OUTBACK DIGITAL NETWORK
ABN 25 087 911 699

ODN response to the Australian Communications Authority Monitoring and reporting on telecommunications services in remote Indigenous communities, Discussion Paper, May 2004

The Outback Digital Network writes in response to the Australian Communications Authority (ACA) *Monitoring and Reporting on Telecommunications Services in Remote Indigenous communities, Discussion Paper, May 2004*.

In citing from the Australian Communications Authority (ACA) *Monitoring and reporting on telecommunications services in remote Indigenous communities*:

Background

 It is widely acknowledged that there is a lack of publicly available information about the range, adequacy and availability of services to remote Indigenous communities. Considerable work has been conducted in recent times to developing approaches to address service access and information issues. The ACA's approach to the development of a monitoring and data collection framework in accordance with RTI recommendation 5.3, aims to build on work previously conducted in this area. This section outlines some of the programs, reviews and initiatives that have informed the ACA's approach.

In 2001, the Department of Communications, Information Technology and the Arts (DCITA) established a taskforce to investigate telecommunications service levels and needs in Indigenous communities and to develop a strategy and action plan for improving service levels over the longer term. The study focused on the approximately 1,300 community managed Indigenous communities in Australia, as identified by the Community Housing and Infrastructure Needs (CHIN) Survey [1]. As a result of this study, the government announced its *Telecommunications Action Plan for Remote Indigenous Communities* (TAPRIC program) in mid 2002. The direction of TAPRIC was supported by the RTI.

One key body of work arising out of the TAPRIC program was the development of a database on Indigenous communities and telecommunications services, using input from DCITA, ATSIS, Telstra and the ACA. The 'TAPRIC database' contains the precise geographical coordinates of discrete Indigenous communities across Australia and records information on the range and number of services provided to communities. Information on Indigenous communities is sourced primarily from CHIN survey data [2]. The range of services in the database includes the STS, payphones, CDMA and GSM coverage, broadband links and two-way satellite Internet (2WSI) services. Information contained in the TAPRIC database will form an important component of developing a capability in response to RTI recommendation 5.3.

In late 2003, the ACA conducted a review of payphone policy (Payphone Review) which commented on the adequacy of payphone services in Australia, with a significant component of the report dedicated to payphone services in remote Indigenous communities. The Payphone Review found that payphones in remote Indigenous communities serve a wider role than payphones in other communities and provide a lifeline service. It made a number of recommendations to improve payphone access, suitability and quality of service in these areas.

In December 2003, the ACA released its initial response to RTI recommendation 7.2 through the *Telecommunications Industry Monitoring and Reporting Discussion Paper* (Monitoring Discussion Paper). This paper specified future data collection, monitoring and reporting arrangements.

Other telecommunications studies have also informed the ACA's approach. For example, the *Telecommunications Needs Assessment*, conducted by the government of Western Australia in 2003, made a

OUTBACK DIGITAL NETWORK
ABN 25 087 911 699

number of findings regarding communications needs, accessibility and existing infrastructure in regional Western Australia.

ODN has read and understood this section.

FIRST COMMENT: Interested parties should be made aware what is the true benchmark in terms of data currently available (and its margin of error) so from, in effect, where the ACA is starting from and what is the benchmark it wishes to achieve, if only to cost the undertaking and time to achieve. It is ODN understands that TAPRIC had engaged with Telstra to provide data into the TAPRIC database; it therefore would be helpful to know how far that had progressed and/or was this undertaking now accomplished.

SECOND COMMENT: ODN does agree with the ACA's Payphone Review," found that payphones in remote Indigenous communities serve a wider role than payphones in other communities and provide a lifeline service". But equally, payphones should be part of the many ways Indigenous people have access to a phone service (ODN makes its same point in its submission to the recently federally tabled USO Review).

THIRD COMMENT: What weight has or will be attributed to the Western Australia Government's *Telecommunications Needs Assessment Study* by the ACA. Equally, it would be helpful to know whether this study provided data not otherwise available; did it verify or conflict with other data sources of the ACA or provide more timely data.

ACA Question 1
Comment is sought on the need for an explicit definition of a 'remote Indigenous community' for the purpose of data collection and monitoring and whether:
- the proposed definition is appropriate; and
- the proposed strategy of initially monitoring known TAPRIC communities with the inclusion of additional communities as they are identified is reasonable.

ODN has read and understood this section of ACA Discussion Paper

FOURTH COMMENT: It may be relevant that the ACA acknowledge that Indigenous people group themselves with little regard for State or Territory borders and can be highly mobile. The compiling or presentation of information should take this into account. The notion of discrete communities at times can be problematic but ODN also recognises that the ACA must define what it is to monitor so this information is made publicly available to directly benefit Indigenous people.

ACA Question 2
Comment is sought on the ACA's proposed arrangements for capturing information on product service range, availability and take-up together with product initiatives in remote Indigenous communities.

ODN has read and understood this section of ACA Discussion Paper

FIFTH COMMENT: ODN acknowledges the ACA cites Outback Digital Network (ODN) and the Cape York Digital Network under its *Other Telecommunications Services* listings. While telephone penetration for Indigenous communities is appalling low, data penetration rates or as data services available to Indigenous communities are even lower (source: ODN Regional Community Surveys).

OUTBACK DIGITAL NETWORK
ABN 25 087 911 699

With an increased interest in IP telephony as a maturing technology, ODN suggests that another way into increased phone penetration for Indigenous communities is via data services. (IP telephony is a data service). An understanding then as to what data services are availability to Indigenous communities and their level of functionality further than at installation, and consideration to the cost to run or the total cost of ownership, plus frequency of use should be understood also.

> **ACA Question 3**
> Comment is sought on the ACA's intended approach to monitoring and verifying that performance of standard telephone services in remote Indigenous communities is comparable to the CSG area to which the community belongs.

ODN agrees with the ACA's suggested approach.

SIXTH COMMENT: It maybe helpful to provide information as to the related telephone exchanges in regards to any ad hoc or case study work undertaken. The intent here is to understand service line faults as to exchange faults and/or the need to upgrade. ODN's understanding is Telstra has over 5,000 exchanges across the country and an understanding as to the current functionality of those telephone exchanges servicing Indigenous communities should be made publicly available and monitored.

> **ACA Question 4**
> Comment is sought on the ACA's intention to monitor the performance of payphone services at a remote Indigenous community level.

ODN has read and understood this section.

SEVENTH COMMENT: ODN acknowledges that pragmatically in some cases, payphones are the ONLY means by which a community has access to a telephone service currently. ODN hopes that a separate reporting on payphones located in remote Indigenous communities will highlight service levels and access issues to the ACA and not be seen as setting a double standard.

> **ACA Question 5**
> Comment is sought on whether the ACA should monitor community phone and pre-paid services supplied to remote Indigenous communities and what type of monitoring activities the ACA should undertake.

ODN has read and understood this section.

EIGHTH COMMENT: ODN remains concerned as to the pre-paid phone cards option. Specifically, ODN suggests to the ACA's suggested criteria
> "number of pre-paid calling products utilised";

this should also include how used. Our intent here would be to try to determine, how the card was used as a simple test - was it used to its full value. There may be multiple reasons for a pre-paid card not being fully claimed by an individual such as: the card was lost; the card was used once or twice because after an individual had been shown how to use the card, but they still found it too hard to use regularly; or system failure. ODN does not think it reasonable that the ACA should have to determine and then report on the reasons for a card not being claimed to its full value though the suggested ACA case study may provided some in-sight.

OUTBACK DIGITAL NETWORK
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Further as this is almost totally a Telstra product offering how does the ACA intend to monitor?

ACA Question 6
Comment is sought on any other relevant information.

NINTH COMMENT: ODN notes and shares the concern of the ACA as to privacy issues for Indigenous Australians particular for monitoring in small isolated remote communities. Further we suggested the ACA's concern for privacy should be extended as to, if any, collection of information on data use. We suggest that the collection of data down to detail such as what websites an individual visited is intrusive.

TENTH COMMENT: ODN acknowledges the ACA efforts in the area of remote Indigenous communities. It also suggests:
- Graphically presentation of data complied as area or regional maps (even if the area is across State borders) should be considered.
- The inclusion of Indigenous community data against data from its associated regional service town or centre as determined under the Extended Zones Agreements.
- The continuation of the ACA's involvement in regional telecommunications workshops such as at the recent Tennant Creek Telecommunications Workshop along with attendance by representatives from the TIO (Telecommunications Industry Ombudsman) and Telstra representatives and
- Finally, we bring to the attention of the ACA that ODN over six years ago undertook extensive primary research into those communities covered through their corresponding ODN regional organisation and have recently provided data for the Utopia region in the Northern Territory at the request of ACA.

On behalf of the Directors of Outback Digital Network Ltd, our thanks for any of your time and consideration in the matters raised in this submission.

Yours Sincerely,

Philip Dutchak
ODN National Project Manager