

14 July 2017

Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Secretary

### **Re Telecommunications Reform Package**

The National Farmers' Federation (NFF) writes to express its support for the Telecommunications Legislation Amendment (Competition and Consumer) Bill 2017 and the Telecommunications (Regional and Broadband Scheme) Charge Bill 2017 – collectively known as the Telecommunication Reform Package (“the reform package”). It is NFF’s desire for the legislation to be enacted as soon as possible.

The NFF has long held the view that all Australians have a right to access reliable broadband. To this end, the NFF has consistently advocated for a baseline broadband service to be part of the telecommunications Universal Service Obligation (USO). We note the Productivity Commission released the final report of its inquiry and has recommended that a baseline data and voice service be developed.

The NFF understands the reform package will guarantee access to data networks for all premises through the Statutory Infrastructure Provider (SIP). This is important as, while the mandate of the National Broadband Network was to deliver broadband to all Australians, there has previously not been a statutory requirement to do so. In effect, this package will legally ensure all Australians will have access to broadband infrastructure.

In addition, NFF is pleased that the package contains a requirement that all premises must be able to access a network that is capable offering a peak download speed of at least 25Mbps and an upload speed of 5Mbps. We are also keen to ensure that services and data allowances continue to evolve to the changing needs of consumers and the legislation must be flexible enough to reflect that.

Furthermore, the reform package will provide the Minister with powers to set standards, rules and benchmarks which the SIP must meet or exceed which is a welcome measure. The bill also provides for service provider rules which, if implemented properly, will ensure that customers will have clarity about who is

responsible for addressing their concerns and prevent responsibility shifting between retailers and network service providers.

Consumers must continue to be protected by guarantees and safeguards and these must be part of any new regime. For a truly congruous framework to be developed, it is critical that the SIP regime and consumer safeguards are aligned as much as possible. We also call on the Australian Government to commence the consumer safeguard review as soon as possible.

The NFF is very supportive of the Regional Broadband Scheme (RBS) which we believe will ensure Regional services are funded sustainably and transparently. The idea behind the RBS is to sustainably fund the long term costs of uncommercial satellite and fixed wireless networks in rural, regional and remote Australia.

The NFF seeks to temper any concerns that investment in uncommercial telecommunications infrastructure is potentially distortionary to competition. To simplify the rationale for investment to this extent is short-sighted and fails to consider long term economic benefit to the country – even from agricultural productivity alone.

The NFF believes that both government and industry can collaboratively play a significant role in funding uncommercial infrastructure provided the framework is holistic and encompasses the suite of processes that are presently occurring in the telecommunication field. A levy is, in many ways, the most logical and equitable means of seeking an industry contribution.

The NFF is concerned about the implications of the package requiring fixed line and wireless networks capable of making and receiving phone calls. While satellite services are not expected to have the same capability under the reform package, we reiterate that voice services should not be delivered over satellite services due to concerns about reliability, and that copper ‘landline’ services should remain in place.

In addition, we would seek assurances that delivering voice of fixed wireless services will also offer reliable service given that even nbn Co has acknowledged it was never designed for voice services.

For further information please contact:



**MARK HARVEY-SUTTON**  
Manager Rural Affairs  
National Farmers' Federation  
Email: [mharveysutton@nff.org.au](mailto:mharveysutton@nff.org.au)  
Phone: 02 6269 5666