My submission is that from a rural resident viewpoint, that **a Telecommunications Universal Service Obligation for access to dedicated landlines is still very much required.** My submission centres around concern that all aspects of the impact that removal of the current USO on rural, regional and remote communities has not been fully thought out, and could leave people in these areas without adequate coverage of dedicated landline phone services.

Firstly, I must state that I feel there was a highly offensive and simplistic view in the PC draft, where it is implied that where people live is a “lifestyle choice”, and subsequently those making a “choice” to live in particular areas that are not covered by cable or fixed wireless NBN should basically put up with less service (which is often at a significantly higher premium). Implying that there is a simple “lifestyle choice” in this matter for the bulk of Australians from rural, regional and remote communities is such an ignorant assumption, and offensive to anyone who lives and works in non-metropolitan areas. People in rural, reginal and remote areas cannot simply pack up and move to somewhere that has better internet services – the fact that this idea is even breath in the document smacks of a fundamental lack of understanding about the issues at hand. I sincerely hope that this viewpoint is corrected in the final version of the document.

Secondly, I feel that the PC has overlooked the following issues in the draft:

1. **It is unacceptable that if landline services are cut and those in rural, regional and remote areas are “forced” over to SkyMuster VOIP, then residents may be left without any phone services during an emergency situation if there is a power outage, or rain event, when VOIP will not work.**

The PC draft has said that SkyMuster satellite may provide adequate VOIP coverage for rural residents. However this does not seem to address the issues surrounding power outages which are more frequent in rural areas. Essential Energy in NSW has made a media release, which was published in my local paper the Narrandera Argus (Wednesday 18th January 2017) stating that power outages due to storms are most common during October to April – this also coincides with the bushfire season.

The PC draft also doesn’t fully address the effect of cloud cover/rain signal quality which can severely impact ability to make VOIP calls.

1. The PC draft has stated that most of the country is covered with mobile phone services, however **the draft report has not addressed at all the quality of signal strength of the available mobile phone coverage in rural areas.**

Just because an area is shown as covered on a map, does not mean adequate signal is available at all times. For example, my farm and residence are “covered” by mobile reception on the map, even though the quality of signal strength is exceptionally poor. I am not able to make telephone calls from anywhere inside my home on my mobile handset (which is a blue tick handset), and there is very limited (1 bar) reception in the area directly outside my home whereby the call quality is severely compromised and frequently drops out. There are significant portions on our farm that there is no signal. These same issue plagues all of the residences on neighbouring properties in our immediate vicinity. Yet we are all still shown as having “mobile coverage” on any provider maps.

Currently we only have signal within our house due to paying a significant cost for a cel-fi booster and Yagi antenna on our roof – however both are rendered useless in a blackout, which means we have no mobile reception within our home during power outages.

**The PC draft does not currently factor in the availability of strong mobile signal - at a three bar signal strength minimum - when making recommendations in this report**. Many rural houses do not have strong signal strength, and rely on extra (and costly) requirements such as Yagi antennas connected to cel-fi boosters – which only works on mains power so is useless in a blackout.

1. **Landline services cannot be cut in areas not covered by fixed wireless signal, on an “assumption” that all premises will be connected to SkyMuster.**

The PC draft assumes that all residences and businesses in rural, regional and areas not covered by the fixed wireless footprint will take up satellite services, therefore will be able to access some form of VOIP service.

This is another erroneous assumption, as there could be a significant number of premises, especially in rural and remote areas, that do not take up SkyMuster satellite services. On our farm we have three residences, two of which are currently unoccupied. However the other two residences have landline phone ports and it would take a very short time for a landline to be connected when the new residents move in. However, if the landline option is removed for our area, then residents could face weeks of not being able to connect to services awaiting installation of SkyMuster services – and this is in an area where mobile phone strength is weak or non-existent and requires the extra impost and cost of Yagi antennas and Cel-Fi signal boosters.

Also, another factor that makes the assumption that all premises in non-fixed wireless coverage areas will connect to SkyMuster for satellite provision, is that many people find the offerings of data plans related to SkyMuster unequitable and sub-standard. This is because there are severe limits to the amount of available data on SkyMuster plans, and the extremely unfriendly Off Peak hours, as well as the Fair Use Policy that limits monthly peak data usage to a mere 75GB over any four week period. The lack of foresight by NBN co in only having a Fixed Wireless footprint of 14kms (instead of 20-30 kmons which some private companies can do), the inequity in data availability, high costs and lack of “future proofing” of the data amounts that will be required in due course for the SkyMuster set up, is another factor impacting on why SkyMuster should not be held up as the “solution” for rural and regional residents.

I know that for us personally at my home, we will not be connecting to SkyMuster satellite in the foreseeable future. Currently by using our Yagi antenna, and bundling mobile phone and mobile broadband services, we can access 142 gb of data at any time using a Telstra Mobile Broadband modem. Accessing this amount of data AT ANY TIME, and without a monthly Fair Use restriction, outweighs the fact that it is more expensive and also subject to slower speeds, simply to have enough data for not only farm business needs, but education requirements for my two children, and also then limited personal use (there is no “luxury” of streaming Netflix for us). We also maintain a landline for use as well.

Finally, **I would like to reiterate that a Telecommunications Universal Service Obligation for access to landlines is still very much required.** This is especially so in rural and remote areas where there is limited mobile signal strength (one-two bar signal strength) or no mobile services, and with regard to people experiencing homelessness and requiring some form of pay-phone access.

I would like to offer a suggestion that the NBN CO takes on the management of future USO, as they can be an independent not-for-profit regulator of provision of these services without being prejudiced by cost provision in needing to report to and make money for shareholders. NBN Co then then contract out service/maintenance to providers to ensure continuity of service. As I note that the lack of transparency in costings in the current USO contract with Telstra was an issue in the draft report, having NBN Co manage this aspect would also ensure specific reporting on costs associated with USO can be accurately reported.

Please do not hesitate to contact me if further information is required regarding this matter.

Kind regards

A rural resident

from the Southern Riverina in NSW