



Advancing Australian Cotton

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

Cotton Australia writes to express 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”).

Cotton Australia is the peak industry body representing Australia’s cotton growers. We are a member of the National Farmers’ Federation (NFF) and along with NFF are a founding member of the Regional, Rural and Remote Communications Coalition (RRRCC) which is an alliance of 19 organisations concerned about connectivity to the bush.

The need to urgently remedy the issues that currently exist within the current telecommunications setting in Australia, and in particular those affecting agricultural businesses, is of utmost importance to our members who still face significant difficulties with their communication services. As well as impacting on how these farm businesses operate on a daily basis, this is severely limiting the extent to which agriculture as a sector can advance, and reap the productivity gains to be had through fully utilising agricultural technologies.

We therefore welcome these reforms, which address a number of necessary improvements, and seek that this legislation be enacted as soon as possible. We support the points made in the NFF’s submission, also representing the RRRCC, and present our views in more detail below.

Telecommunications Legislation Amendment (Competition And Consumer) Bill 2017

Cotton Australia maintains that regional, rural and remote consumers and businesses need legislative rights to access broadband data and voice services. We believe the reforms which will legally ensure access to data networks for all premises through the Statutory Infrastructure Provider are a critical stipulation.

We also welcome the requirement that all premises in Australia have access to a peak download speed of at least 25 Mbps and a peak upload speed of at least 5 Mbps. We note that in its final inquiry report on the Telecommunications USO, the Productivity Commission recommended the development of a baseline voice and data service.

We are pleased to see the inclusion of upload speeds in these supply obligations given the importance of upload speeds to modern day agricultural businesses. For example upload speeds are necessary for applications such as video conferencing, and cloud based services, and uploading critical decision making data from machinery, drones and telemetry.

Whilst the inclusion of the minimum download and upload speed requirements is crucial, we believe it is also important that this be represented in the legislation in a way that allows for flexibility, in light of rapid technology development and the actual upload and download speeds required to service the changing basic connectivity needs of consumers. This will ensure that the legislative framework doesn't become quickly outdated. In our submission to the Productivity Commission's inquiry into the USO, we called for a system of review that introduces flexibility in the definition of 'baseline broadband'.

We welcome the inclusion of a number of mechanisms that will improve consumer protection:

- a. giving Ministers the power to set standards, rules and benchmarks that SIPs must comply with (or in the case of benchmarks, meet or exceed); and
- b. service provider rules that will help ensure that customers have clarity about who is responsible for addressing their concerns and prevent responsibility shifting between retailers and network service providers.

We support the statements in the NFF submission regarding consumer protections and safeguards, that:

- a. Consumer guarantees and safeguards must be part of any new regime
- b. It is critical that the SIP regime and consumer safeguards are aligned as much as possible
- c. The Australian Government commence the consumer safeguard review as soon as possible.

Cotton Australia would also like to reiterate the key points made by the NFF in their submission, highlighting concern for 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, voice services should not be delivered over satellite services due to concerns about reliability, and copper 'landline' services should remain in place. Like the NFF, we seek assurances that delivering voice over fixed wireless services will also offer reliable service, given that even nbn Co has acknowledged it was never designed for voice services.

Telecommunications (Regional Broadband Scheme) Charge Bill 2017 - funding of fixed wireless broadband and satellite broadband

Cotton Australia is supportive of the Regional Broadband Scheme (RBS) to ensure Regional services are funded sustainably and transparently.

We understand that the Bill is a taxation measure that will impose a charge to support the long-term sustainability of non-commercial fixed wireless and satellite networks servicing regional, rural and remote Australia. Full accountability and transparency of Regional Broadband Scheme expenditure will be important to ensure the integrity of the scheme.

In summary, Cotton Australia welcomes the measures introduced in the reform package and seek that the legislation be enacted as soon as possible to ensure a quality telecommunications service in regional, rural and remote Australia. We value this opportunity to put forth our views on this important legislation.

Yours sincerely,

Angela Bradburn
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Cotton Australia