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8 February 2011

Mr Andrew McGowan  
Inquiry Secretary  
Standing Committee on Infrastructure and Communications  
PO Box 6021  
CANBERRA ACT 2600



Dear Mr McGowan

**Re: National Broadband Network Inquiry**

This submission is made on behalf of the East Gippsland Shire Council to the House of Representatives Standing Committee on Infrastructure and Communications Inquiry, which is examining the capacity of the National Broadband Network (NBN).

East Gippsland Shire

East Gippsland Shire is a predominantly rural area, with many townships and small communities. Its estimated resident population of 43,615 (ABS, June 2009) is concentrated around the Gippsland Lakes and is relatively sparsely settled elsewhere. The largest commercial centre is Bairnsdale, while the largest tourist centre is Lakes Entrance. Other significant townships include Orbost, Paynesville, Omeo and Mallacoota. The Shire encompasses a total land area of about 20,930 square kilometres, including substantial areas of national park, state park, lakes, rivers and coastal areas. The main industries in East Gippsland are agriculture/horticulture, timber, manufacturing and tourism.

Submission to the National Broadband Network Inquiry

The East Gippsland Shire Council welcomes the implementation of the NBN as a key initiative which will address many of the telecommunications and broadband issues which impact on the regional Victoria.

The East Gippsland Shire Council Plan 2009 – 2013 includes a priority action to: *Advocate for the availability of broadband and mobile communications to all East Gippsland communities and work with the High Country Councils Coalition (HCCC) to improve telecommunications in the region.* Please also see the separate submission made by the HCCC.

East Gippsland Shire Council is a member of the Gippsland Local Government Network (GLGN), which is an alliance of six Gippsland Councils who work collaboratively on the issues that affect the Gippsland Region. GLGN represents the collective voice of Gippsland. The other GLGN Councils are Bass Coast Shire Council, Baw Baw Shire Council, Latrobe City Council, South Gippsland Shire Council and Wellington Shire Council.

As a member of the GLGN, East Gippsland Shire Council actively participated in the development of the Gippsland Regional Plan 2010 which, it endorsed in August 2010.

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*Improved business and community connectivity through regional high-speed broadband access is a priority identified in the Gippsland Regional Plan.*

High quality and affordable broadband infrastructure is recognised as a key building block for regions and communities seeking to become more productive, liveable and sustainable. The importance of this infrastructure to regional, rural and remote areas and the particular challenges faced insuring equitable and affordable access in these areas have been well documented.

Gippsland's settlement pattern has a very high proportion of communities in towns of less than 1000 people that are dispersed throughout the region's coastal and rural areas. These communities account for some 40% of the regional population or around 100,000 people. Unlike many other regions the vast majority of Gippsland's small towns and villages are not declining in population and will remain as a distinct element of the region's population dynamic. (Gippsland Regional Plan, 2010).

The recommendation in the Gippsland Regional Plan Priorities 2010 (page 12) is that: *Gippsland to be given the highest priority for the simultaneous rollout of high speed broadband and "non-fibre to the home" solutions that will benefit small communities, given this region has one of the highest dispersed populations with over 100,000 residents (40% of the regional population) being located in towns of less than 1000 people.* East Gippsland Shire Council strongly endorses this Gippsland Regional Plan recommendation as many of its small towns and residents are impacted.

East Gippsland Shire Council notes the terms of reference of the current inquiry in which the Committee has been asked to examine the capacity of the NBN to contribute to the nine identified key outcomes.

East Gippsland Shire Council wishes to make particular comment on the following issues:

- Simultaneous implementation

East Gippsland Shire Council requests simultaneous implementation of Fixed Wireless, Satellite Services and direct Optic Fibre as it is concerned that sequential implementation will leave many in East Gippsland at considerable disadvantage.

- Price

East Gippsland Shire Council notes that NBN Co's wholesale access price - \$24 per month - for a peak download speed of 12 Mbps is the same for direct Optic Fibre services, Fixed Wireless and Satellite Services (NBN Co Corporate Plan, Dec 2010). However, it remains concerned that there may be considerable disparity in retail pricing for those accessing Fixed Wireless and Satellite Services. These users should not be at a retail price disadvantage when compared to those accessing direct Optic Fibre services.

- Speed and access

East Gippsland Shire Council notes that Fixed Wireless and Satellite services will have peak download speeds vastly inferior to those available through direct Optic Fibre services, which will be up to 1000 Mbps. In this context the Council suggests that thought be given to providing suitable public access points at key Optic Fibre nodes. This would be in addition to the proposed Fibre to the Home and Fibre to Business connections and could include public facilities such as libraries and Council business centres. Locations such as Mallacoota and Orbost come to mind. This would provide access to

high level health, education and business services to the large number of individuals and businesses in the East Gippsland region who would otherwise only be able to access the lower level services available through Fixed Wireless and Satellite, which have peak download speeds of up to 12 Mbps. Without this access these individuals and businesses will not be able to avail themselves of the higher level services promised by the NBN.

In conclusion, the East Gippsland Shire Council welcomes the implementation of the NBN and:

- seeks action to address identified infrastructure gaps and requests simultaneous implementation of Fixed Wireless, Satellite Services and direct Optic Fibre services;
- remains concerned that there may be considerable disparity in retail pricing for those accessing Fixed Wireless and Satellite Services. These users should not be at a price disadvantage when compared to those accessing direct Optic Fibre services; and
- notes that the Fixed Wireless and Satellite services will have peak download speeds vastly inferior to the maximum peak download speeds available through direct Optic Fibre services. East Gippsland Shire Council suggests that suitable public access points be provided at key Optic Fibre nodes to enable Fixed Wireless and Satellite users to avail themselves of the higher level services promised by the NBN.

Thank you for the opportunity to make comment to the Inquiry into the National Broadband Network.

Yours sincerely

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**STEVE KOZLOWSKI**  
**Chief Executive Officer**