

29 July 2024



Natalie Peters Jones

Digital Inclusion Team/
First Nations Digital Inclusion Advisory Group Secretariat
Department of Infrastructure, Transport, Regional Development, Communications
and the Arts

by email: natalie.petersjones@infrastructure.gov.au
firstnationsdigitalinclusion@infrastructure.gov.au

Dear Natalie,

RE: First Nations Digital Inclusion Roadmap

Communications Alliance (CA) welcomes the opportunity to provide this submission in response to the First Nations Digital Inclusion Advisory Group's discussion paper on the First Nations digital inclusion roadmap.

Overarching remarks

CA supports the key principles outlined in the paper and believes that the persistent issues perpetuating the digital divide in Australia can only be understood and addressed through key stakeholders working collaboratively with First Nations representatives to understand and consider how best to address issues. As such, we support the approach taken by the First Nations Digital Inclusion Advisory Group (FNDIAG) to bringing together First Nations People and key stakeholders and are pleased to engage through that group, with CA represented at CEO level.

This submission does not repeat the issues covered within that forum. However, we note that recent topics of discussion in FNDIAG include:

- consideration of whether it could leverage the CA and the industry's experience in the installation of infrastructure by using the Telecommunications (Low Impact Facilities) Determination 2018 as a template for installing remote infrastructure among First nations communities;
- considering whether FNDIAG can leverage from CA's experience in dealing with energy providers to address energy requirements impacting remote infrastructure reliability and affordability; and
- working together to consider how ACMA rules on Authentication might be amended to address known concerns with the requirements that negatively impact some First Nations people.

TCP Code revisions relevant to this discussion

As the Department is aware, as part of the Review Committee, CA has been considering whether changes to its *Telecommunications Consumer Protections (TCP) Code* can be made to better assist First Nations people specifically, as well as

working to introduce a raft of wider new or revised changes that it believes will benefit both First Nations people.

The wider changes proposed for a revised Code include strengthened plain-English requirements for key documents provided by Carriage Service Providers (CSPs).

Cultural awareness, languages, digital literacy, literacy and raising awareness for First Nations people of protections

The TCP Code Drafting Committee considered that there would be benefit in the TCP Code being able to point to a central resource that could be used by businesses (telco and other) for cultural awareness training for staff, information about various First Nation languages and potentially other information. It might include, for example, information for telecommunication retail service providers (RSPs) to highlight that people in remote communities may rely on mobile data more than consumers in less remote areas, with guidance about product and service options that may be more suitable for, or preferred by, this cohort of customers. Similarly, it may include guidance to help RSPs understand or ask about other use scenarios that might be more common in First Nations communities than other communities. It is our understanding that such a resource does not currently exist.

Consistent with the principle 'nothing about us without us', a collaborative approach is required to identify what is required and to develop (and maintain) relevant material. CA wrote to FNDIAG in October 2023 to suggest such a collaborative approach. Although we have received no formal response from FNDIAG, our understanding from discussions with the Department is that the suggestion is considered to have merit. As such, we'd like to re-iterate our commitment to work with FNDIAG to develop such a resource.

Such a resource could also include a section for First Nations people to assist them find the information they need about telco and other services in an appropriately accessible format and language - for example, it might be presented in 'easy English'. Part of it could perhaps be through a grassroots online community attached to the Regional Training Hub. This may help with access, affordability and digital ability information.

Once developed, we would look to include an amendment to the TCP Code to specifically require training about cultural awareness, or other appropriate rule or reference (in consultation with the relevant groups).

In the interim, CA continues to welcome constructive suggestions on any amendments that can be made now to the current TCP Code draft to meet specific identified needs. For example, would it be useful for CA to develop an 'easy English' version of its TCP Code Guideline for Consumers?

The Department is already involved and providing comment as part of the iterative drafting process being followed to review the Code, but other interested parties may access the draft Code and see next steps on CA's [website](#). Note that comments are welcome at any time, but it is expected that the Code will be out for full public consultation in late August or September.

Other

The TCP Code is only one of many of the Codes, Guidelines and other forums that can be constructively used to develop and implement ideas and approaches to address identified issues. Refer to the introduction to this submission for further information.

Access

It remains a challenge technically and economically to provide infrastructure and service across Australia's vast land mass, which disproportionately affects First Nations people living in remote and regional areas, where population density is typically low. However, new technologies are developing apace – as the FNDIAG has already been exploring. Integrated (multiple orbit) satellite and terrestrial networks are already building on their capability to provide coverage and service throughout Australia in areas where most terrestrial access technologies are simply uneconomical. Non-terrestrial networks will help to deliver resilient services to consumers and businesses which currently have more limited network coverage, as well as providing service in emergencies when the terrestrial networks are unavailable or congested. This partnership between space and terrestrial based networks is expected to bring significant social and economic benefits to Australia.

The speed and effectiveness of integrated networks will in part depend on the regulatory support for such an environment and CA would encourage FNDIAG to take an active interest in the issues to support regulatory arrangements that support the competitive and quick adoption of these technologies.

CA notes that initiatives under the [Better Connectivity Plan](#) play – and will continue to play – an important role in connecting Australia.

If you would like to discuss any aspect of this submission, or would be interested in attending a meeting between CA and the energy providers to understand solar panel depreciation issues, please do not hesitate to contact me (stanton@commsalliance.com.au), or Senior Manager, Policy and Regulation, Peppi Wilson (p.wilson@commsalliance.com.au).

We look forward to continued constructive engagement on these important issues.

Yours sincerely,



John Stanton
Chief Executive Officer

About Communications Alliance

Communications Alliance is the primary communications industry body in Australia. Its membership is drawn from a wide cross-section of the communications industry, including carriers, carriage and internet service providers, content providers, platform providers, equipment vendors, IT companies, consultants and business groups.

Its vision is to be the most influential association in Australian communications, co-operatively initiating programs that promote sustainable industry development, innovation and growth, while generating positive outcomes for customers and society.

The prime mission of Communications Alliance is to create a co-operative stakeholder environment that allows the industry to take the lead on initiatives which grow the Australian communications industry, enhance the connectivity of all Australians and foster the highest standards of business behaviour.

For more details about Communications Alliance, see <http://www.commsalliance.com.au>.