



AgForce Queensland Industrial Union of Employers

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Assistant Secretary
Networks Competition Branch
Department of Broadband, Communications and the Digital Economy
GPO Box 2154
CANBERRA ACT 2601

Dear Sir or Madam

NATIONAL BROADBAND NETWORK: REGULATORY REFORM FOR 21ST CENTURY BROADBAND

AgForce Queensland is the peak rural industry organization representing approximately 7000 cattle, sheep and wool, and grain producers across Queensland. AgForce strives to ensure the long term growth, viability, competitiveness and profitability of Queensland's broadacre producers, as well as the communities within which they live and work.

Policy Goals

AgForce supports the Federal Government's policy goals in relation to the transition to a National Broadband Network, as stated on page 3 of the Discussion Paper:

- Improving productivity across the economy
- Consumer protection
- Rural, regional and remote Australia, and
- Reducing unnecessary regulation

in addition to recognizing community safety and national security objectives.

However, whilst competition issues are of concern to metropolitan users, many in rural, regional and remote Australia simply require access to a telecommunications service which is of comparable quality and reliability to their metropolitan counterparts.

In particular, AgForce supports measures which will:

- Increase the ability of people living in rural, regional and remote communities to access superfast broadband in their homes, businesses and schools, and enable participation in the online community
- ensure equity of access
- improve reliability of telecommunications networks
- provide continued availability of payphones in rural, regional and remote areas (particularly where mobile phone coverage is limited or non-existent).

Optical Fibre

Whilst it is acknowledged that superfast broadband may be able to be delivered by wireless or satellite, optical fibre connection provides a vastly superior service in terms of reliability – and should be accessible to as many Australians as possible.

AgForce, therefore, supports the provision of an optical fibre connection to every community which contains critical government services, including health, education, emergency, and community services.

Such government services are placing an ever-increasing reliance on their clients being able to access broadband services. For example, the Queensland Department of Primary Industries is planning to deliver fifty percent of its services online by 2012. The provision of virtual diagnostic services and streaming of online education is also causing further demand by rural, regional and remote communities for the delivery of telecommunications services at a similar standard to that available in metropolitan areas. The availability of superfast broadband services to rural, regional and remote communities also opens up the opportunity for governments across Australia to reduce recurrent funding by delivering appropriate services online.

Whilst AgForce recognizes that it may not be practical to run optical fibre to every rural property in Australia, it is imperative that any delivery by satellite or wireless is backed by optical fibre to the closest settlement.

Equity

As the most decentralized state in Australia, Queensland contains many communities with populations of less than 1000 people. AgForce is concerned that the Federal Government's intention to provide superfast broadband of 100mbs for only 90% of the population via optical fibre will leave the remaining 10% of the population with a second class service of 12 mbs via a mixture of satellite and wireless.

In order to address this obvious equity issue, as well as to satisfy the Australian Government's interests in providing the required infrastructure to enable our agricultural and resource industries to develop to their full economic potential, this difference must be addressed.

Regional Development

Australia's prosperity is closely linked to the strength of its agricultural and resource sectors, which are in turn increasingly dependent upon the availability of telecommunications infrastructure, including superfast broadband, to support and grow their businesses.

In order to facilitate strong regional development, it is imperative that developers of major infrastructure in remote areas (eg. mines) be required to enable access by rural, regional and remote Australians whose homes or businesses reside within the area being developed.

Glasson Recommendations

In conclusion, AgForce is very supportive of the recommendations of the Regional Telecommunications Independent Review Committee (Glasson report), including specific recommendations concerning:

- a Communications Service Standard to replace the Universal Service Obligation (which now appears obsolete)
- strengthening of the Customer Service Guarantee to improve service reliability in rural, regional and remote areas – through replacing working days with calendar days, and tightening the service disruption criteria.
- Strengthening the Network Reliability Framework to ensure an adequate level of infrastructure remediation in rural, regional and remote areas.

Yours sincerely



Brendan Fletcher
Telecommunications Policy Director