8 November 2021

National Indigenous Australians Agency (NIAA)
digitalinclusion@niaa.gov.au

Dear NIAA

Indigenous Digital Inclusion Plan – Discussion paper

I welcome the opportunity to comment on the NIAA's discussion paper for the Australian Government's Indigenous Digital Inclusion Plan.

My office handles telecommunications complaints from residential and small business consumers across Australia, including from Indigenous Australians who live in regional or remote communities. I am interested in being part of the conversation as the Indigenous Digital Inclusion Plan develops and look forward to seeing the improved connectivity it brings to Indigenous Australians as it is implemented.

Our complaints show consumers living in regional or remote communities often do not have access to reliable or affordable telecommunications services. Consumers living in these communities can face unique challenges and have unique needs compared to their metropolitan counterparts, which means it is important that solutions are tailored to their needs.

Alongside our complaints, we gain insights into the needs of Indigenous Australians and those living in regional and remote communities through our Consumer Panel. I co-chair the Panel with the coordinator of Financial Counselling Australia's Aboriginal and Torres Strait Islander Network. Recently, we appointed the Regional Tech Hub as a member of our Consumer Panel, which will better connect us with an important collective voice for consumers living in regional and rural areas.

Consumers in regional or remote areas need access to affordable and reliable services

Complaints to my office show consumers living in regional or remote communities often have fewer options for telecommunications services and use the service to do more things. A telecommunications service might be the only way a consumer can access banking, medical care, education, or work.

While the consequences of poor services in regional and remote areas can be greater, telecommunications service faults can take longer to repair and there may be fewer alternative services available.[1]

> Our submission to the 2021 Regional Telecommunications Review includes the story of *Erna who lives in a remote community in South Australia. Erna told us an outage meant she could not use any of her telecommunications services for several days.
>
> Erna said she, along with her local community, could not access the town's ATM or buy groceries at the local store, and would not have been able to call for help in the case of an emergency.
>
> *Name has been changed

Our complaints reveal complexities around providing effective telecommunications services to remote indigenous communities, which are some of our most under-served communities. To be effective,

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[1] Section 2: Service Reliability – TIO submission to the 2021 Regional Telco Review

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solutions must be tailored to the practical needs of individual communities. Our submission to the Department's consultation _Round 5A of the Mobile Black Spot Program_ suggested effective solutions must be affordable, user-friendly, robust, and relevant.

We said any new equipment consumers need must:

- offer functionality aligning with the level of technical knowledge of the communities who will use it
- accommodate the socioeconomic footprint of the community
- be reliable and robust, and
- be designed to meet the specific needs of the community.

We also noted the importance of continuing the 3G network until consumers currently using 3G services have access to affordable alternate solutions.

Consumers living in areas on the fringe of mobile coverage could benefit from mobile devices that can access both standard mobile networks and satellite networks.[2] A government-subsidised program could offset any increase in cost for devices.

Our letter to the _Regional Connectivity Program – draft grant opportunity guidelines_ in 2020 also expressed support for solutions that address localised service issues and improve connectivity for remote indigenous communities. I am pleased to see the current round of the grant opportunity dedicates funding to Northern Australia and consider that incentives such as government grants are key to improving services in areas that do not deliver traditional economic benefits.[3]

Consumers in regional or remote areas would benefit from easy access to impartial information

It is important consumers have easy access to clear and relevant information about services available in their area. Our submission to the _2021 Regional Telecommunications Review_ outlined that consumers would benefit from the following information:

1. **Service and plan information by region.** Information about services and plans for regional areas would allow consumers to weigh up their options and make an informed decision about which telco provider and plan is right for them. At times, we see consumers asking third parties such as financial counsellors for information or help with finding a suitable plan.
2. **Mobile coverage by region.** Standardised coverage maps would provide consumers with a useful and impartial resource about the mobile coverage in their area. Currently, mobile carriers publish their own coverage maps and at times they can include confusing information. Some carriers include the percentage of the Australian population its network covers, and we hear from consumers who mistakenly interpret it as a representation of geographic area.

> Our submission to _Round 5A of the Mobile Black Spot Program_ includes the story of *Kirra who began experiencing slow speeds and frequent dropouts on her mobile service after moving to a remote indigenous community in north Queensland.
>
> Kirra said she could not use her mobile to access services such as internet banking, even though her provider's coverage map showed 3G coverage.
>
> *Name has been changed

The Regional Tech Hub provides useful information and support to consumers about telecommunications services and could be extended to include area-specific information about service availability, plans, and mobile coverage.

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[2] Section 4: Mobile Coverage – TIO submission to the 2021 Regional Telco Review
[3] Section 4: Improving access for regional and remote communities – TIO submission to the 2021 Regional Telco Review

Providers should sell telecommunications products responsibly

Past systemic investigations by my office show Indigenous Australians experiencing vulnerability have suffered detriment when telecommunications products were not sold responsibly.
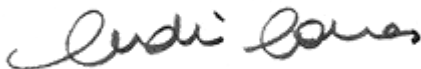
> Our 2019 systemic investigation report *Sales Practices Driving Consumer Debt* includes the story of *Betty who was sold two phone plans and handsets she could not afford. Her representative said Betty spoke minimal English, did not understand what she was agreeing to, and that her only source of income was a disability pension.
>
> Before we received the complaint, Betty's provider had disconnected the services for non-payment and listed a default on her credit report.
>
> *Name has been changed*

We have previously recommended telecommunications providers deliver regular staff training in recognising and supporting consumers experiencing vulnerability, as well as ensuring sales training includes a focus on ethical selling.[4]

Yours faithfully

Judi Jones
Telecommunications Industry Ombudsman

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[4] TIO Systemic Investigation Report - Sales Practices Driving Consumer Debt