



23 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 High Country Councils Coalition (HCCC) to the House of Representatives Standing Committee on Infrastructure and Communications Inquiry, which is examining the capacity of the National Broadband Network (NBN).

High Country Councils Coalition (HCCC)

The HCCC comprises the following seven Victorian municipalities: Alpine, Baw Baw, East Gippsland, Indigo, Mansfield, Towong and Wellington.

Accordingly, the HCCC represents a combined area of 53,526 square kilometres or about 25% of Victoria. The combined population is in excess of 165,000 with the majority located in small towns with several larger towns; Bairnsdale, Sale and Warragul with populations a little over 10,000 each. The main industries in the region are agriculture/horticulture, timber, manufacturing and tourism.

Submission to the National Broadband Network Inquiry

The HCCC welcomes the implementation of the NBN as a key initiative which will address many of the telecommunications and broadband issues which impact on the high country region of Victoria.

The HCCC has identified telecommunications as a key issue in the HCCC area. The HCCC is concerned that much of the high country region of Victoria will be covered by Satellite and Fixed Wireless services, which will operate at speeds vastly inferior to direct Optic Fibre services.

Telecommunications, or the lack of it, has always been an issue within the HCCC area. The participating Councils straddle the Great Dividing Range and are home to the most rugged and remote areas in Victoria. The area is very much prone to natural disasters as witnessed in the recent bush fires and floods.

In order to better understand this issue the HCCC commissioned WF & Associates Pty Ltd to prepare a *Telecommunications and Broadband Report (April 2010)*. In summary this Report:

- Identifies and documents mobile telephone black spots;
- Identifies and documents broadband black spots after the roll out of the NBN; and
- Estimates indicative costs to address identified infrastructure gaps.

While the current NBN roll out includes a greater optic fibre footprint, and comprehensive fixed wireless and satellite coverage, than indicated in earlier proposals, we expect that the information included in the in WF & Associates report (April 2010) will be of interest to the Inquiry. Accordingly a copy of the *Telecommunications and Broadband Report (WF & Associates Pty Ltd, April 2010)* is provided at **Attachment 1**.

The HCCC 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 (9) identified key outcomes.

The HCCC wishes to make particular comment on the following issues:

- Timeliness

The HCCC seeks action to address identified infrastructure gaps in a timelier manner than proposed under the current NBN roll out program. The HCCC requests simultaneous implementation of Fixed Wireless, Satellite Services along with direct Optic Fibre as it is concerned that sequential implementation will leave those in the HCCC area at considerable disadvantage.

- Price

The HCCC 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 (source: 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 price disadvantage when compared to those accessing direct Optic Fibre services.

- Speed and access

The HCCC notes that Fixed Wireless and Satellite services will have peak download speeds vastly inferior to those through direct Optic Fibre services, which will be up to 1000 Mbps. In this context the HCCC 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 Bright, Corryong, Mansfield, Mallacoota, Orbost and Tallangatta 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 high country region of Victoria 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 business will not be able to avail themselves of the higher level services promised by the NBN.

- Natural disasters

The HCCC asks that consideration be given to the role the NBN can play in improving our response to natural disasters. This could include Bush Fire monitoring.

- Improved farm practices

The HCCC asks that consideration be given to the role that broadband and the NBN can play in improving farm practices including their financial and environmental sustainability.

Page 3

In conclusion, the HCCC welcomes the implementation of the NBN and:

- seeks action to address identified infrastructure gaps in a timelier manner than proposed under the current NBN roll out program;
- 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;
- 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. The HCCC 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; and
- asks that consideration be given to the role the NBN can play in improving our response to natural disasters and farm practices.

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

Yours sincerely

STEVE KOZLOWSKI
Chief Executive Officer
East Gippsland Shire Council

on behalf of the High Country Councils Coalition