

12 February 2019

Consumer Safeguards Review
Department of Communications and the Arts
GPO Box 2154
CANBERRA ACT 2601



Via email: consumersafeguardsreview@communications.gov.au

To whom it may Concern,

RE Consumer Safeguards Review Part B

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Consumer Safeguards Review Part B – Reliability of Services.

The NFF was established in 1979 as the national peak body representing farmers and the broader agriculture sector across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain. Access to reliable, affordable and quality telecommunications is crucial to our members, and the Consumer Safeguard Review presents an important opportunity to make improvements to telecommunications services in regional, rural and remote Australia.

Telecommunications provide a means to facilitate economic growth across the agricultural sector through innovations in production, improved market access and enhanced consumer connectivity. Access to telecommunications is also central to regional development and social connectivity, and to the delivery of essential services such as education and health. Lack of access to reliable, affordable and efficient telecommunications in regional Australia is hampering the uptake of innovative technologies that are so crucial to enabling agriculture and regional communities to grow.

The NFF is actively engaged in telecommunications reform, including as a founding member of the Regional, Rural and Remote Communications Coalition (RRRCC), an alliance of 21 volunteer and advocacy organisations formed to advocate for better connectivity in regional Australia. The RRRCC has identified five fundamental outcomes that must be addressed to ensure equitable connectivity for regional and remote consumers. One of these five outcomes is voice and data services that meet minimum standards and reliability – which is directly relevant to the Consumer Safeguards Review. The NFF provided a submission to the Consumer Safeguards Review Part A, and would like to express support for the Part B submission provided by the Australian Communications Consumer Action Network (ACCAN) – also a member of the RRRCC. In particular, we support the following recommendations made by ACCAN, as particularly relevant to regional, rural and remote stakeholders:

- **Recommendation 1: Connection and repair time frames**
 - a) Fixed line telecommunications services are essential and require regulation to protect consumers.
 - b) Mandatory connection and repair timeframes should apply to all fixed line services delivered by all providers.
 - c) The maximum timeframes applying to retail service providers should be at least the same as the existing Customer Service Guarantee and be defined in terms of days (not working days).
 - d) Maximum timeframes applying to wholesale providers should be less than those applying to retail service providers.
- **Recommendation 4:** One set of maximum connection and repair timeframes to apply to all fixed line products without exception.
- **Recommendation 5:** Include a specific provision in the consumer safeguards instruments that provides telecommunications customers the right to exit a contract without penalty on the grounds of recurrent faults.
- **Recommendation 6:** Incentives to repair faults quickly.
 - a) Customers receive automatic compensation for missed timeframes.
 - b) Compensation amounts be set initially at current CSG levels for voice and broadband services.
 - c) ACMA conduct a review to determine appropriate future compensation arrangements.
- **Recommendation 8:** Network reliability information should be made public in consumer facing portals as well as consolidated reports published by the Australian Communications and Media Authority (ACMA) quarterly.
- **Recommendation 13:** ACMA develops rules and standards to implement consumer safeguards for reliability with effect by 31 December 2019.

The NFF is happy to expand on any issues raised in this letter of support. If any further information is required please contact Adrienne Ryan, General Manager Rural Affairs, on [REDACTED].

We look forward to the opportunity to engage in Part C of the review.

Yours sincerely,

[REDACTED]

TONY MAHAR
Chief Executive Officer