



30 October 2020

Australian Competition and Consumer Commission  
Infrastructure Regulation Division  
GPO Box 3131  
CANBERRA ACT 2601

Via email: [broadbandperformance@accc.gov.au](mailto:broadbandperformance@accc.gov.au)

Dear Sir/Madam,

**Re: Australian Competition and Consumer Commission Review of the Measuring Broadband Australia program**

The Regional, Rural and Remote Communications Coalition (RRRCC) welcomes the opportunity to provide a submission to the Australian Competition and Consumer Commission's (ACCC) Review of the Measuring Broadband Australia (MBA) program.

The RRRCC is an alliance of 21 volunteer and advocacy organisations with a shared interest in improving telecommunications in the bush. The Coalition was formed in 2016 to raise awareness of the important role of connectivity for regional, rural and remote Australians and to advocate for continued improvements. The RRRCC's advocacy efforts are focused on five high-level goals, under which we have articulated a number of specific asks. The RRRCC's five goals are:

1. Guaranteed access to voice and data services.
2. Equitable voice and data services that meet minimum standards and reliability.
3. Continued program to expand mobile coverage.
4. Digital capacity building for regional, rural and remote Australia.
5. Affordable communications services for regional, rural and remote Australia.

Under goal two, the RRRCC has a priority ask that the ACCC MBA program be extended to include fixed wireless and satellite services. Under its current scope the MBA program does not capture the experiences of the many regional, rural and remote consumers who are not able to access a fixed line broadband connection. The RRRCC believe that since its establishment the MBA program has been effective in providing consumers, industry and policymakers with independent, new and valuable insights on the performance and reliability of fixed-line retail broadband services in Australia, which supports broadband providers to more efficiently meet consumer demand. The RRRCC strongly support the continuation of the program, extended to include the types of broadband services that many regional, rural and remote consumers rely on.

The RRRCC is encouraged that the ACCC's is considering expanding the MBA into additional technologies and alternative networks, including the NBN fixed wireless services. Many regional, rural and remote consumers continue to experience significant performance issues with NBN fixed wireless services. While NBN produces valuable data on congestion and public metrics, this information does not provide performance information or upload performance data, which would be delivered if the MBA program was to be extended.

In addition to the inclusion of fixed wireless services, the RRRCC would support including satellite services under the MBA program. With such clear success of the program improving both the market and experiences of fixed-line consumers, the ACCC should ensure that these benefits are felt across the country by all Australians regardless of where they live. Expanding the program to both fixed wireless and satellite would help to ensure no Australian gets left behind. The RRRCC would be happy to facilitate the identification of volunteers living in regional, rural and remote areas to participate in the expanded program.

The MBA program's focus on metrics important to residential broadband users has been very beneficial to understanding residential consumer needs. While positive, these metrics do not capture the needs of small, medium or large businesses. The RRRCC would strongly support a specific panel of business volunteers and the addition of new performance metrics to produce data on business needs (as noted in question 19). As with residential volunteers, the RRRCC is happy to facilitate identification of small and medium businesses who would be open to assisting in trials – including healthcare providers that rely on broadband to deliver their services.

Should you require any further information in relation to this submission, please contact Adrienne Ryan, General Manager Rural Affairs at the National Farmers' Federation, on 02 6269 5666 or [aryan@nff.org.au](mailto:aryan@nff.org.au).

Yours Sincerely,

### The Regional, Rural and Remote Communications Coalition

