

Our Ref: CT15 - 04

Rhonda Jolly  
Regional Broadband Policy and Technical Support  
Department of Communications, Information Technology and the Arts  
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Dear Rhonda,

## **BROADBAND CONNECT AND CLEVER NETWORKS DISCUSSION PAPER**

The Gascoyne Development Commission would like to offer its support to the Department of Communications, Information Technology and the Arts (DCITA) towards the program being developed. Equitable access to broadband services across the Gascoyne is integral for our region to keep up with the modern world. There has been considerable effort already directed towards broadband connection in the Gascoyne however gaps still remain. The Connect Australia Package would be well placed to address such gaps.

The GDC is keen to ensure that the rollout of new broadband infrastructure networks and innovative application improves the delivery of health, education and other essential services in our region. The design principles proposed for the Connect Australia Package appear adequate to facilitate such growth in broadband services in remote Australia. In regards to the questions posed in the discussion paper please consider the following responses.

### **1. Targeting the delivery of key services through broadband**

#### *Targeted services for Clever Networks initiatives*

Q8 Are health, education, emergency services and local government the appropriate services for Clever Networks to target?

Although health, education, emergency services and local government are vital areas to concentrate on, it would not be appropriate to limit the program to predetermined services. The funding should be as widely dispersed as possible to maximise benefits to communities. Furthermore it is not just Government that provides health, education and emergency services to communities. Business and not for profit groups are key groups involved in service delivery and should also benefit from the Clever Networks funding initiative.

**Q9 Should there be priorities within this group?**

Priorities within the targeted services should not be determined by the Clever Networks Program as this may limit the benefits that can be provided to the wider community in the longer term. The Grant process will determine the best distribution of the Clever Networks funding across the State to achieve maximum results for isolated and rural communities. Ultimately the delivery of this funding program must be designed to ensure that marginal communities are not overlooked due to their small rate payer base or isolation from major towns. Of Major concern in the Gascoyne is that the business case for providers to supply broadband services to small and isolated communities at affordable prices comparable to metro areas remains at best marginal or in many cases - unviable. This is where funding through the Clever Networks Program can make a real difference to the barrier of isolation and remoteness.

**Q10 What other sectors, if any, should also be considered?**

The business and not for profit sectors need to be considered along with Government, being key service providers to the community also.

**Q12 What strategies could be incorporated into the program design to ensure that investment under Clever Networks provides the greatest holistic community benefit?**

Extending the Clever Networks program to Government, Not for Profit, Business and Community is integral to achieve a holistic community benefit. The ultimate aim must be to make broadband affordable to entire communities not just schools, hospitals, local government and emergency services. Regional Development Commissions, local reference groups (e.g. Gascoyne Telecommunications Working Group) and Local Government can play a key role in recommending priority areas for funding across the various regions given their close knowledge of the region's needs and capabilities. They can also help ensure the funding is targeted to ensure the greatest community benefit due to their knowledge of issues and the region's complexities.

**2. Infrastructure versus applications**

*Infrastructure and application-focused investment issues*

Q13 Is there an ideal balance between infrastructure and applications streams and, if so, how can it be identified?

Q14 What is the best balance between competitively determined and strategic investment funding?

Q15 Would potential proposals be improved if the guidelines permit proposals which encompass both infrastructure and applications aspects?

Q16 What key strategic investments in broadband infrastructure have the potential to provide the best outcomes?

Investment in infrastructure by government is the most sustainable and effective use of grant funds. Infrastructure costs are a major impediment for isolated communities with low populations. Such communities are those that are in most need of broadband and other technologies to connect residents to the global economy and information highway. The GDC supports an emphasis on infrastructure by the Clever Networks program to stimulate broadband solutions. The comment made by the Department of Industry and Resources in their submission to this discussion paper also evokes the GDC's opinion on existing schemes that address infrastructure:

*"While the Higher Bandwidth Incentive Scheme (HiBIS) and its replacement, Broadband Connect, fund infrastructure provision indirectly through customer subsidies, they are not providing solutions in small towns where residential customer demand is low. This is particularly true of Indigenous communities."*

### **3. Alternative contribution sources for proposals**

#### *Funding for Clever Networks initiatives*

Q17 Are there complementary sources of funding/contributions which should be considered in developing the guidelines for the Clever Networks program?

A requirement for complementary sources of funding will disadvantage those small and remote communities that are most in need of funding and broadband services. Such remote areas have a very small base of funding just to maintain and upgrade basic community programs such as roads, health services, community buildings, airport infrastructure and many other key areas of expenditure. This does not leave much room for complementary funding towards a program such as Clever Networks.

As the submission by the Department of Industry and Resources recognises:

*"The jurisdictions with low population densities, small town sizes and long distances are the least attractive for commercial solutions. Yet the more remote the area, the greater the reliance on communications services, as evidenced by the findings of the State's Telecommunications Needs Assessment and so the greater importance of broadband provision to the Australians living in these regions."*

In Kind contributions are the most likely form of matching contribution from localities that are disadvantaged by remoteness and low population densities.

## **5. Sustainability of new infrastructure or applications**

### *Sustainability of Clever Networks initiatives*

Q21 What supporting information should be required in Clever Networks proposals in order for their sustainability beyond the life of the program to be evaluated effectively, and what factors should be considered in determining sustainability?

The sustainability of initiatives driven by the Clever Networks funding will depend on the engagement of local government and other stakeholders during the initial development phase of infrastructure projects. This highlights the importance of bringing all stakeholders on board in developing projects for regions. This may be appropriate as a criteria in Clever Networks Guidelines.

In evaluating the effectiveness of projects funded through the Clever Networks program it will be important to consider both economic and social factors, both equally as important in a healthy community.

## **7. Linkages to other initiatives**

### *Links to other initiatives*

Q25 What other program activities should be taken into consideration in determining Clever Network program eligibility and entitlement?

It would be appropriate for the Clever Network program to include liaison with existing reference groups and all stakeholders in regions in any entitlement to funding. For example those submitting funding applications for broadband projects in the Gascoyne should consult with the Gascoyne Telecommunications Working Group, Local Shire Offices and the GDC to garner support and perspective on different issues. This can only be of benefit to the wider community, not an impediment. The Community Broadband project is also an important existing activity which could help guide the implementation of the Clever Network program across our regions. This Broker for this project is already working with stakeholders across the regions and is well placed to provide advice on eligibility and entitlement.

In offering a submission to this discussion paper, I would like to once again highlight the need for particular attention on the smaller isolated rural communities. The Clever Networks program represents an ideal opportunity to help those disadvantaged by the tyranny of distance and remoteness. The GDC supports the implementation of the Clever Networks Program to our remote communities in the achievement of affordable and community wide broadband access.

For further information please contact Fiona Shallcross at the Commission on phone 99411803 or email [fshallcross@gdc.wa.gov.au](mailto:fshallcross@gdc.wa.gov.au).

Yours faithfully,

Stephen Yule  
A/Chief Executive Officer

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