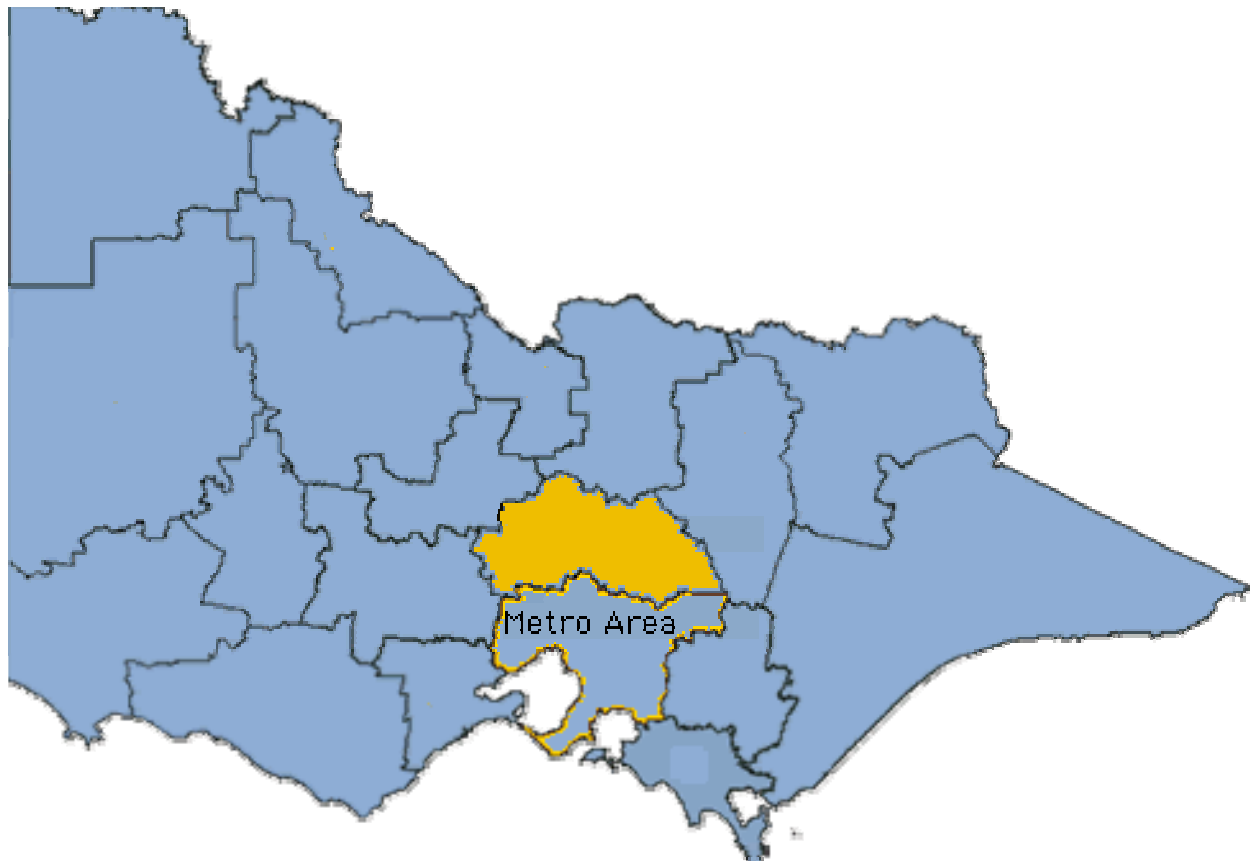


BROADBAND CONNECT & CLEVER NETWORKS PROGRAM SUBMISSION



As the Demand Aggregation Broker, representing the Local Learning and Employment Network(LLEN), and the Shires of Macedon Ranges Shire, Mitchell and Murrindindi, in the current Central Ranges Shire Council Demand Aggregation Broker Project, I wish to make a submission in relation to the design of Broadband Connect and Clever Networks broadband programs.

Community Based Broadband Demand Aggregation Brokers Funding Application Form

Broadband Connect

Q.1 I believe that the programs can be optimised by the investment of funds in infrastructure, and by ensuring that that infrastructure is accessible to all service providers rather than placed in the ownership or control of individual service providers.

Telstra's recent announcement (The Sunday Age January 15 2006) that it will not provide wholesale services under Broadband Connect emphasises the need to do this.

In my opinion, the current problems involved in providing broadband services to regional and rural Australia result from the cost of installation to smaller populations, and the lack of real competition in those smaller markets.

Q.2 Strategic investment, rather than commercially focused investment, may be the only way to ensure that infrastructure is delivered to these markets – but access to that infrastructure must be available to all service providers to ensure competition exists in those smaller markets.

Q.3 It has also been suggested that the telecommunications regulatory framework be adjusted in relation to regional markets, where incumbency is powerful and investment is harder to attract.

ATUG has highlighted a number of areas where the current regime is not conducive to supporting the type of competition that is developing in regional areas. New technologies, new business models and supply-side players mean we need a new approach to competition in regional areas.

ATUG also believes that an independent body should be empowered to monitor the implementation of access decisions and agreements between Telstra and small regional operators – such as the UK Office of the Telecommunications Adjudicator. This body monitors implementation performance and provides an industry based but independent reference point for discussions between BT and its competitors about the practicalities of access. Such a body also provides an early warning of possible anti-competitive behaviour.

The ownership and control of any infrastructure funded by Broadband Connect could be placed with such an independent body, or perhaps the local municipal councils(?) could be a means of ensuring open access to it by all service providers.

All Broadband Connect funding should be made on the basis that access to any surplus or underused capacity is guaranteed to be made available to other service providers, if required.

Investment funding should only be made available when these assurances are documented – and where surplus capacity is provided.

Q.4 Wireless terrestrial technologies are emerging as the most appropriate means of delivering broadband in regional, rural and remote areas.

Across Australia, private microwave point-to-point systems are proliferating to reduce local data costs and provide connectivity with private data, and increasingly, voice and data networks.

City-wide wireless access systems – including Wi-Fi and pre-WiMAX networks - are being established in smaller and smaller communities; and local people, ISPs and Universities are building wireless networks to service remote communities.

Strategic partnerships are being formed between carriers, vendors, local government and local business groups, to develop Broadband Wireless Access systems.

Wi-Fi is a global success story that was possible because of ready access to spectrum and open standards delivering low costs and strong competition between multiple manufacturers.

Community Based Broadband Demand Aggregation Brokers Funding Application Form

This may lead to single, meshed networks where multiple embedded CDMA or Wi Max devices are managed by the same system providing on-net telephony between home – office – car.

Broadband Connect should seriously consider the potential of these new technologies, rather than invest in a copper network which may already be obsolete.

Q.11 Broadband Connect should seek additional information on all technologies, from all service providers, before providing registration or funding - and ensure that funding is only be made available when satisfactory assurances are given and documented.

Q 12 Based on world trends it is likely that wireless technologies will have the most impact on the delivery of regional broadband services in the next three to five years.

Wireless technologies allow other service providers to avoid “the last mile” monopoly that Telstra enjoys in relation to the copper network.

Q 13 Wireless technologies are generally also the most cost effective means of delivering services over longer distances to smaller communities.

Q 16 Broadband Connect should ensure that all technologies are flexible and scalable, so as to be able to adapt to the constant changes occurring across the telecommunications industry.

Q 20 Broadband Connect is seen as an opportunity to move away from the current monopoly of communications assets, by ensuring that investment in infrastructure is available to be used by all service providers.

The empowerment of local government, or another independent body to monitor the implementation of access arrangements and agreements between the service providers – such as the UK Office of the Telecommunications Adjudicator, is seen as the best way to achieve this.

Although local government often lacks the technical expertise to operate carrier services, it does possess a strong community interface, and the ability to manage or control the lease of tower and mast sites, and the installation of ducting and pipes within streets and road.

The ownership and control of any infrastructure funded by Broadband Connect could be placed with such an independent body, as a means of ensuring open access to it by all service providers.

Clever Networks

Clever Networks aims to identify areas which are underserved by higher bandwidth infrastructure and to leverage investment from industry and governments and work actively with local communities to improve broadband infrastructure and services in those areas.

Q.1 In Victoria the Demand Aggregation Broker program has operated in competition to the State Government TPAMS program, and has not been able to leverage investment from government sectors to improve broadband infrastructure and services for the community.

If the current DAB program structure was able to leverage investment from government sectors it could potentially improve the quality of broadband infrastructure and services deliverable to the community.

Q.2 The role of the DAB broker is primarily to educate and promote broadband to the community, and to aggregate community demand on a non-sectoral basis, to achieve the best outcome for the community as a whole.

Community Based Broadband Demand Aggregation Brokers Funding Application Form

Q.14 The best balance between competitively determined and strategic investment will be one where no community is disadvantaged - where there is insufficient market demand, hopefully there will be strategic investment.

Access to infrastructure should be unrestricted and available to all service providers.

Q.20 To ensure that newly emerging technologies are readily available it is essential that open access regimes be created in relation to trunk infrastructure, and backhaul.

A number of local government and regional initiatives in relation to the provision of trunk infrastructure and community assets are being developed and should be politically and financially supported.

Communities are becoming more self-reliant and are starting to develop innovative ways to solve their own problems. Whilst there are arguments about the right technology, many towns, and shires are making do with less-than-perfect solutions - but getting solutions nonetheless. Government MUST show guidance in these often unregulated areas

Local Government and regional authorities must be supported and adequately resourced to discriminate between the increasingly complex offerings of multiple carriers instead of meekly accepting the largesse of the incumbent.

Decisions need to be made and regulations and guidelines developed and promulgated for the management and control of open access to shared infrastructure pit'n'pipe, cable, network units, spectrum and fibre assets.

Councils can facilitate development on the basis of shared pit'n'pipe to carry all services to homes, offices and factories, granting reasonable open access to that infrastructure.

With industry and Government support, they could provide fibre Passive Optic Networks to new greenfield estates so that products and services can be effectively delivered there.

Given the developments in wireless technologies and the demand for broadband in regional areas, the management of spectrum is becoming an increasingly important and mainstream area of communications policy.

Spectrum licences are a tradeable, technology neutral spectrum access right for a fixed non-renewable term. This means that the licence is not limited to any particular technology, system or service. Spectrum licences give licensees the freedom to deploy devices anywhere within their licence area, provided that the devices are compatible with the core conditions of the licence and the technical framework for the bands. Terms are fixed for up to fifteen years.

Spectrum licences are tradeable. Licensees can negotiate in the open market with others to buy and sell spectrum space as the need arises, or authorise third parties to use their spectrum space. Spectrum licences can be combined or sub-divided to form new licences.

The maximum use must be made of spectrum to accelerate the rollout of broadband to regional end users, and specific provisions should be included in the Radiocommunications Act to discourage hoarding of spectrum in regional areas where there is already lack of competition.

We want the Federal Government to help us develop our plans and to provide support for our efforts by enacting suitable amendments to the regulatory regime to facilitate community access to BWA spectrum and to legitimise community ownership of last mile infrastructure without onerous regulatory conditions being attached.

**Community Based Broadband Demand Aggregation Brokers
Funding Application Form**

Name	Gary Sheridan
Title	Demand Aggregation Broker
Name of Organisation:	Macedon Ranges Shire Council (?)
Type of Organisation (eg community, not-for-profit, local education, local health etc). Please also indicate what community the organisation represents and demonstrate the links with, and interests of the nominated community:	<p>Community, Education, Local Government.</p> <p>As lead agent in an alliance across Macedon, Mitchell and Murrindindi Shires, the Macedon Ranges Shire will also draw on the support of the Mitchell and Murrindindi Shires, the Central Ranges Local Learning and Employment Network.</p> <p>Collectively, these organisations represent stakeholders from all sectors of communities across the three Shires</p>
Registered Business Address:	129 Mollison St, Kyneton, Vic 3444
Postal Address:	P.O. Box 151, Kyneton 3444
Telephone:	03 5422 0342
Facsimile:	(03) 5422 3623
E-mail:	garys@macedon-ranges.vic.gov.au