



Regional Connectivity Program



Department of Communications and the Arts - Discussion Paper

Response of First Nations Media
Australia

September 2019



This submission is made by First Nations Media Australia. Some members may make individual submissions in which case the First Nations Media Australia submission should not be taken to displace those submissions.

About First Nations Media Australia

First Nations Media Australia is the peak body for Indigenous media and communications. It was founded in 2001 as the peak body for remote Indigenous media and communications. In late 2016 it transitioned to the national peak body for First Nations broadcasting, media and communications.

About the First Nations broadcasting and media sector

First Nations broadcasters are not-for-profit community organisations providing a primary and essential service to their communities. Collectively, they reach nearly 50% of the Australian Aboriginal and Torres Strait Islander population. First Nations broadcasters and media producers also connect non-Indigenous communities with Aboriginal and Torres Strait Islander people and culture, developing greater understanding and building stronger relationships.

First Nations Media Australia members include media organisations focused on radio, television, print and online platforms, individual broadcasters, producers, journalists, filmmakers and freelancers and supporters. The scope of the First Nations media sector includes:

- **Radio:** Over 230 radio broadcast sites coordinated by 35 licensed, community-owned, not-for-profit organisations. These radio services able to reach around 320,000 First Nations people, including around 100,000 very hard to reach people in remote Indigenous communities, or approximately 47% of the First Nations population. They broadcast live shows, plus interviews, radio documentaries, news, emergency information, community events, government and other messaging within community broadcasting guidelines.
- **Video & film production:** Production of culture and language-based content for broadcast & online distribution.

- **TV:** National (NITV) and regional (ICTV) TV services; local TV services (Goolarri TV at Broome, Larrakia TV at Darwin). ICTV satellite TV service reaches 240,000 remote households.
- **News production:** National, regional and local news and current affairs services for broadcast, as well as print and online news media, including:
 - National Indigenous Radio Service (NIRS) and its National Indigenous News and Weekly News-in-Review
 - Central Australian Aboriginal Media Association's news service, including its Strong Voices program
 - Koori Radio's news and current affairs programming
 - NITV News and Living Black
 - Print media including Koori Mail and National Indigenous Times
- **Print and Online:** A national newspaper (Koori Mail) alongside a strong web presence of journalistic sites such as IndigenousX, National Indigenous Times and indigiTUBE, a dedicated online platform showcasing aggregated content complimented by an app streaming 20 radio services. First Nations media organisations have a strong social media following and publish content online daily.

The First Nations broadcasting sector delivers programming in over 20 languages nationally, including the first language of many people in remote communities. In the remote context, it is the most reliable and ubiquitous radio and media service available to audiences. The sector is based in local communities and employs local people as broadcasters and media producers. It is a local and trusted voice as evidenced in the 2017 Social Return on Investment analysis of First Nations broadcasters which demonstrated an almost 3:1 return on investment in social outcomes.¹ The sector reaches significant audience share with 80% of people in remote Indigenous communities being regular listeners to radio services.²

¹ <https://www.firstnationsmedia.org.au/about/social-value-study-2017>

² <https://www.firstnationsmedia.org.au/projects/indigenous-communications-and-media-survey-2016>

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1. Introduction

First Nations Media Australia welcomes the opportunity to comment on the Department of Communications and the Arts' Regional Connectivity Program – discussion paper. As advocates for regional connectivity, particularly in remote Indigenous communities, we see significant potential to achieve social and digital inclusion benefits through the Regional Connectivity Program.

FNMA commends the Australian Government on committing \$220million investment into regional communications - to extend the Mobile Black Spots Program (\$160m) and establish the Regional Connectivity Program (\$60m) - as part of its response to the 2018 Regional Telecommunications Review. We also commend the commitment to developing an Indigenous Digital Inclusion Plan, however, we note that there was no budget or timeframe associated with that plan. FNMA urges that a fully funded and recurrent Indigenous Digital Inclusion Program be established as a matter of urgency to stem the growing digital gap between remote and regional Aboriginal and Torres Strait Islanders and other Australians. A portion of the Regional Connectivity Program funding could help contribute to the connectivity elements of such a program, particularly to support affordable last-mile access to broadband in remote indigenous communities.

This submission is informed by over 8 years of industry and community consultation about regional and remote connectivity issues. The crossover of infrastructure, digital literacy and access to information between telecommunications and media is significant. For this reason, First Nations Media Australia (formerly the Indigenous Remote Communications Association (IRCA)) was a founding contributor to the Broadband for the Bush Alliance – a collective of 23 organisations focused on remote and regional connectivity within the satellite footprint under NBN - and the annual Broadband for the Bush Forum (up to 2018).

First Nations Media Australia now takes responsibility for the annual Indigenous Focus Day (IFD), which brings together remote Indigenous community stakeholders, industry and government representatives to develop shared digital inclusion policy and strategy positions. A key recommendation from the 2017 and 2018 IFDs was that Indigenous Digital Inclusion become a Closing the Gap target, with FNMA/IRCA leading the advocacy for this position to COAG. In June 2019 over 90 delegates gathered in Mparntwe/Alice Springs for the IFD, resulting in the development of a Policy Action Plan flowing on from the 6-part Indigenous Digital Inclusion Strategy previously recommended to Government. The Communique and summary presentation from the IFD can be found on the [FNMA website](#).

Broadband access and digital literacy are increasingly urgent needs that underpins equitable access to services for Aboriginal and Torres Strait Islander people. In the ten years since the National Indigenous Reform Agreement (NIRA) was developed in 2008, Government and non-government services increasingly moved online.³ Mobile banking emerged in the 2010s, online lodgment of tax returns began in 2013, followed by the launch of MyGov in July 2014 to manage Medicare, Centrelink and other government service interactions. Today, digital connectivity is required to access banking, health, education, employment opportunities, libraries, news, entertainment, shopping and other services that underpin connection to the broader economy.

Telecommunications is an essential service now and digital inclusion is itself considered a human right. This is of particular importance for people living in communities where there is limited direct access to services. Without affordable digital inclusion, it becomes increasingly difficult for Aboriginal and Torres Strait Islander people to live, learn, work, establish businesses and access essential services throughout Australia.

For these reasons, digital inclusion is recognised as one of the key social justice challenges facing policy makers and communities worldwide. It is about using technology as a channel to improve skills, to enhance quality of life, to drive education, access employment opportunities and promote social and economic wellbeing.⁴ In 2019, digital inclusion equates to social inclusion of Aboriginal and Torres Strait Islander people in Australia, and is essential to Closing the Gap.

First Nations Media Australia manages inDigiMOB, a Telstra-funded digital inclusion program for remote communities in the Northern Territory. To date, inDigiMOB has delivered digital inclusion and cyber safety awareness training to 1,947 individuals across 20 communities in the Northern Territory, employing 96 Indigenous Digital Mentors in the process. There is significant demand to expand these activities to other States. This direct experience in providing digital literacy training in remote communities gives us insight into the gaps in phone and internet service delivery for remote Australians and the challenges facing regional providers.

Emerging from the Indigenous Focus Days consultations and our ongoing conversations with industry and community is a six-part Policy Action Plan aimed to reduce inequity and increase access to services and opportunities, which includes:

1. Remote Data collection to measure access, availability, affordability and digital literacy;
2. Improve availability – prioritized rollout of broadband and mobile coverage to communities with limited access;
3. Last-mile access – public internet access through satellite delivered community-wide WiFi and community access computers;

³ Government services have been transitioning to online delivery under the Digital Transformation Strategy

⁴ Digital Inclusion Index, <https://digitalinclusionindex.org.au/about/about-digital-inclusion/>

4. Affordable access – unmetered access to all key online services and affordable pre-paid mobile options;
5. Digital literacy – culturally and language appropriate skills program in remote communities, locally tailored to needs and existing levels of digital access, engagement and skills; and
6. Digital Mentors program to provide local jobs and peer-supported learning model.

FNMA proposes that approximately \$10m of the \$60m Regional Connectivity Program could go towards funding Elements 2, 3 and 4 of this program by rolling out NBN Public interest premises (using Skymuster Plus and expanded monthly download) and WiFi distribution to all interested remote indigenous communities that are not supported under the Mobile Black Spots program and where users are unlikely to subscribe to billed household Skymuster services. While not universal broadband access, this proposal would provide a basic safety net communications service, enable unmetered access to key online services, support learning and digital literacy, enable community control over internet access hours, enable use of WiFi Calling. The program could be jointly delivered by NBN, State/local governments and First Nations media organisations. First Nations Media Organisations can provide use of existing broadcast rooms and towers for WiFi facilities as well as setting up media servers to enable community access to locally relevant media and learning resources.

The Regional Connectivity Program has the potential to significantly impact Government's capacity to meet these objectives if the program guidelines are written in such a way that allows for this type of industry/community-led approach. First Nations Media Australia supports Government's objective to enable full participation in the digital economy and offers the recommendations in this submission as a means to ensure Indigenous Australians are effectively included in the program planning.

2. Approach

First Nations Media Australia encourages the Department of Communications and the Arts to take an outcomes-based approach to the design of funding guidelines for the Regional Connectivity Program. A 'place-based' approach to providing economic opportunities and full participation in the digital economy is certainly required. In many remote Indigenous communities this also extends to the capacity for full participation in Australian society through access to essential services and information.

The Regional Connectivity Program should be designed to meet the needs of the most digitally excluded people first and foremost, rather than focusing exclusively on subsidising telcos to deliver business services in regional areas. The discussion paper acknowledges that essential services operate on a digital-first model and the disadvantage facing people who are not connected, but then does not acknowledge remote communities as a priority area for the Regional Connectivity Program to address.

The discussion paper identifies agricultural, tourism and resource sectors as likely beneficiaries of the Regional Connectivity Program. Reliable and affordable access to broadband services in regional and remote areas would also facilitate economic development opportunities in the communications industry through increased engagement in creative industries across a broad range of fields. First Nations media organisations across the country act as training and skills development hubs, empowering people to move into a range of roles within other sectors (including tourism and resources). Our capacity to carry out this role in regional and remote communities increasingly depends on internet connectivity. First Nations Media Australia encourages Government to think beyond agriculture when addressing regional connectivity and consider the positive impact of increased connectivity on arts, media and creative industries possible through the Regional Connectivity Program.

The Regional Connectivity Program presents an opportunity for Government to:

1. build on the work of the Mobile Blackspot Program and National Broadband Network investments;
2. address a connectivity gap, particularly for remote communities with populations of 50-350 people⁵;
3. strengthen business development in the communications industry; and
4. resource some of the Indigenous Digital Inclusion plan the Government committed to in its response to the Regional Telecommunications Review in March 2019.

⁵ Homelands of under 50 people are covered under the Community Phones Program, which provides phone and WiFi access; Most larger Indigenous communities (over 350) have had mobile services provided under the Mobile Black Spots or other State/Territory co-investment programs.

Full participation in the digital economy for remote and regional communities can be achieved through the following mechanisms:

- Rollout of NBN Public Interest premises (PIP) to up to 50 remote communities with populations of more than 50 people, including WiFi setup.
- Unmetered access to government and key services and the option to purchase pre-paid vouchers to access other services and information.
- The rollout of Skymuster networking services to communities with a Remote Indigenous Broadcasting Service (RIBS) to enable the badly needed upgrade of broadcast transmission and studio equipment as a shared infrastructure outcome of the Regional Connectivity Program.
- The upgrade of RIBS broadcast towers to enable co-located mobile and WiFi infrastructure.
- The use of existing Telstra and HCRC towers for microwave backhaul from mobile towers.

3. Responses to Consultation Questions

a) Key Design Principles

Question 1: Are there additional key elements that should be incorporated into the design of the Regional Connectivity Program?

Yes, we recommend two additional elements:

1. Not-for-profit and First Nations community-controlled organisations should be eligible to apply.
2. The onus of securing co-contributions should be shared with the Department of Communications and the Arts, rather than falling entirely on the applicant for complex, multi-jurisdictional, multi-level of Government projects.

Question 2: Should other parties, for example local government authorities, business organisations or industry groups, be allowed to lead a bid for Regional Connectivity Program funding?

Yes. Limiting applications to telecommunications carriers only presumes the program will be focused on technology solutions only. This approach does not address issues of market failure in small, medium and low socioeconomic communities and creates the potential for conflicts of interest. Instead, the program should require a partnership approach to addressing community needs.

The program should extend beyond technology-focused solutions to achieve targeted and place-based community outcomes through an industry-led approach. The program should allow for community driven solutions such as WiFi facilities, community access facilities, software, unmetered access to service and other solutions to meet community needs to bid for funding.

b) Funding applications to include evidence that there is a priority for the local area

Question 3: Are there other organisations beside local, state and territory governments that could be considered 'trusted sources of information' for the purposes of identifying local telecommunications priorities?

Yes. Peak bodies such as First Nations Media Australia and the Australian Communications Consumer Action Network (ACCAN), Regional Development Australia groups and Remote Indigenous Media Organisations (RIMOs) operating in regional and remote communities can each be considered 'trusted sources of information' for the purposes of identifying local telecommunications priorities. Each of these organisations works closely with people facing connectivity barriers resulting in 'on-ground' expertise.

Question 4: Are there ways that the Department can facilitate linkages between potential infrastructure providers and local communities?

Under a community-led approach, the community would identify an issue which could then be paired with a relevant government-approved provider in instances where a technical solution is required.

c) Requirement for co-contributions

Question 5: Are there any comments that you wish to make in relation to co-contributions?

Financial co-contributions should not be required for Indigenous community-driven projects. In these instances, communities contribute to the project through in-kind use of facilities and/or services along with any ongoing operation and maintenance costs. For example, Remote Indigenous Broadcast Services (RIBS) sites have local broadcast towers and facilities where NBN PIP and WiFi equipment can be located. Access and maintenance for these types of facilities should be acknowledged as a contribution to a project.

In some instances, it may be necessary for a contribution from the Commonwealth to exceed 50 per cent of the project costs in order to meet the desired outcomes of full participation in the digital economy. The guidelines should be written to allow for such variations under a 'place-based' model.

Given that state, territory, local governments, local communities and third parties will be required to make some form of co-contribution to the project, we believe the projects should be driven by those organisations rather than by Telco providers. It would also make securing co-contributor commitments easier if the co-contributor is the lead applicant.

d) Demonstration of need

Question 6: What type of projects should be considered for funding through the Regional Connectivity Program?

All projects that address barriers to digital inclusion should be considered for funding through the Regional Connectivity Program. This may include projects that address access to services and facilities within the community, affordability, WiFi or last-mile sharing, digital literacy, the delivery of locally relevant content such as in-language services and content shared on a local WiFi network. There are a broad range of projects that could address systematic and localised barriers for regional connectivity and contribute to Closing the Gap in First Nations communities.

e) Retail Services

Question 7: Are there any comments that you wish to make in relation to the proposal that all Funded Solutions will provide Retail Services for a minimum of 10-years after the Asset has become operational?

This requirement assumes both a technology solution and a retail service model. If included in the guidelines, it should have a 'where relevant' caveat as a retail service model will not be viable in meeting the needs of most remote communities. The intended program outcome of digital inclusion should be the over-riding factor.

f) Other design principles

Question 8: Are there any comments in relation to the proposed Eligible and Ineligible Areas?

We agree in general with the area definitions described in the discussion paper. However, eligibility should allow for an NBN Network extension project using wireless technologies beyond an existing fixed-line wireless node.

Question 9: Are there any comments that you wish to make in relation to the proposed eligible and ineligible expenditure?

We agree in general with the parameters of expenditure described in the discussion paper, noting our earlier comments on acknowledging operating costs for Funded Solutions as a co-contribution from the applicant or project partner. For projects where Skymuster equipment is required, NBN/RSP should retain ownership and responsibility for maintenance of the equipment.

Question 10: Are there particular circumstances where it may be appropriate for the Commonwealth to make some contribution to ongoing operating expenses?

Yes. To adequately address full participation in the digital economy through the Regional Connectivity Program a range of Indigenous digital inclusion activities is required. In its response to the Regional Telecommunications Review in March 2019, the Government acknowledged the need for an Indigenous Digital Inclusion Plan and agreed to roll out such a program, however no detail on that Plan has been forthcoming as yet. The Regional Connectivity Program could be a mechanism for supporting this commitment through allowing for the funding of capacity building projects toward digital inclusion. These types of projects would likely require an ongoing contribution to operating expenses from the Commonwealth and the program guidelines should allow for applications for these types of projects.

The Commonwealth has invested a significant amount of public funds in the NBN and should continue funding support for the maintenance of its public assets on an ongoing basis. The remote media sector has seen other infrastructure projects fail to meet desired objectives through focusing funding on capital expenditure only without provision for ongoing maintenance for public assets.

Question 11: Is there a case for a third category for highly localized solutions for projects that, for example, are seeking funding of less than \$200,000 (GST inclusive)?

Yes. One example of a bespoke solution could be an NBN PIP and WiFi program implemented on a site by site basis or a regional network basis. This type of solution could be relevant for communities with a population of between 50-350 people who wouldn't otherwise have access to internet under state and territory programs focused on communities of 350+ people.

In this way, the Regional Connectivity Program could be used to develop a universal service product for areas without mobile access, providing a free safety-net service for small and middle sized communities to access essential services (ie. non-video content). This could be done using Skymuster Plus and satellite WiFi delivery, with the option for users to purchase vouchers (eg using Easyweb Digital's Encapto product) should they wish to access other content.

Question 12: Are there any other design principles that should be considered?

We have no further comment at this time.

g) Proposed assessment criteria

Question 13: Do you have any comments on the proposed assessment criteria?

Specific comments on the proposed assessment criteria are:

- Criterion 1 – Economic benefit
The equity of access to the digital economy should be included in this.
- Criterion 2 – Social benefit
Addressing identified barriers to digital inclusion should be a primary criterion.
- Criterion 4 – Financial co-contributions
As per our previous comments, this criterion should carry a 'where relevant' caveat.

4. Concluding Comments

First Nations Media Australia identifies four key obstacles to digital inclusion and full participation in the digital economy as:

1. Availability – access to services and networks, including last mile distribution and community access facilities.
2. Affordability of mobile and internet services, devices and technical support.
3. Awareness – digital skills, cyber-safety issues, knowledge of services and available content.
4. Appropriateness of content and applications, interfaces, language and services.

The Regional Connectivity Program has the potential to make a significant contribution to addressing these barriers and to resourcing the Government's Indigenous Digital Inclusion Plan *if* the program guidelines are designed to facilitate applications for projects to address them.

Government has made a significant investment in the NBN and the Mobile Blackspot Program. The Regional Connectivity Program can build on those investments by supporting their expansion as well as addressing latency issues through the use of low-earth orbit satellites as they become available in the next couple of years.

In principle we support the development of community-led solutions to address systematic barriers for Aboriginal and Torres Strait Islander people, and to encourage partnership arrangements for the benefit of all residents in remote and regional communities.

Therefore, we recommend designing the Regional Connectivity Program guidelines to allow for applications that meet community-identified issues in a more holistic manner than a purely technical focus led by telecommunications providers. While technology solutions and associated partnerships with telecommunications providers will be a requirement in many regions, it is not the only barrier to connectivity which needs to be addressed through this program to facilitate full participation in the digital economy. Funding for an Indigenous Digital Inclusion program should be made available within the \$60 million funding envelope for the Regional Connectivity Program.

