

13 December, 2005

The Manager
Broadband Connect
Department of Communications, Information Technology and the Arts
GPO Box 2154
Canberra ACT 2601

Dear Sir/Madam

Reference: Broadband Connect Discussion Paper

The government is to be applauded for the implementation of initiative programs to assist communities in Regional, Rural and Remote areas in accessing Broadband. HiBIS has proven successful in its endeavours to expand Broadband coverage throughout Australia and help the fast tracking of connections to services through differing technologies.

As a registered Wholesaler and Service Provider, we have encountered and met challenges and have received positive assistance and support from the DCITA HiBIS team. My comments regarding the 'Broadband Connect' program are thus:

1. Registration Process

- The statement that current registered HiBIS providers will not be required to re-register for Broadband Connect providing compliancy with their obligations have been met is encouraging and will provide further motivation to continue to strategically roll-out our network.

2. Incentives

- Whilst the current levels of incentive payments can appear to be adequate, I must agree that given regional, rural and remote demographics are in the main quite vast, the length for the recoupment of infrastructure costs including maintenance together with individual customer support can far exceed the incentive and the monthly customer access fees received. An increase in initiative based on merit would of course be welcomed to help cover a slightly higher percentage of this form of technology infrastructure costs.
- The suggestion of up front incentive payments is inviting and would certainly assist in easing financial pressure of network roll-outs however would require stringent implementation and management guidelines and procedures to be effective.

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- The ever prevalent issue of confirming the prospective customer's level of initiative is of growing concern. The factors we are faced with on a daily basis is the levels are totally reliant on Telstra's ISDN records which are conflicting in more and more cases. For example: A check is undertaken at the time of our prospective customer's first contact – this check confirms a 'High' incentive level. Within a very short period, this check is again undertaken at the time of processing the application and the check states ISDN is enabled and therefore a 'Standard' level is to be claimed. This makes forward planning complicated and in some cases uncertain. I find it quite concerning due to the understanding that areas upgraded by Telstra after the HiBIS commencement date were to remain as unaffected in relation to the program's incentive levels. It would be advantageous to all providers for this issue to be resolved quickly.

3. Customer Prices

- The new price caps for threshold services will prove beneficial to all providers, however could it not be considered to introduce a minimum (entry) threshold to alleviate the significant risk of large Tier 1 players retaining/attaining the commercial and competitive advantage.
- Does not the fact that the price caps for the threshold services stated, also positively indicate to the reader that non-ADSL services have higher ongoing costs than ADSL services? Could this not also be reflected in provider initiatives?

Summary

The ongoing Government commitment to Broadband Connectivity throughout Australia is indeed welcomed and well received by the population at large. To assist providers in their endeavours of providing their services under these initiatives, I strongly believe the Departments undertaking of additional public awareness campaigns on both Broadband and the initiative programs would be advantageous to all. As previously stated, HiBIS has been a success and with further fine tuning 'Broadband Connect' will prove to be an invaluable program for Australia. One we will certainly continue to further provide our services to communities under. I look forward to viewing the final documentation and guidelines for this initiative. I am sure it will prove its viability and be beneficial across the board.

Regards



Sue Jones
General Manager
Wireless Broadband Services Pty Ltd

