

## **Broadband Connect and Clever Networks: Discussion Paper**

Broadcast Engineering Services Pty Ltd T/as e-wire wishes to make a submission to the Department of Communications Information Technology and the Arts to take serious consideration of fundamental issues in the Broadband Connect Program Guidelines and Funding Agreement.

Section 2.7 (12 month timeframe for claims for terrestrial services) specifies that claims for Broadband Connect Services within a specified Service Area are restricted to 12 months for each provider. BES provides HFC and fibre optic cable infrastructure to Greenfield (New) Land Developments. The infrastructure provision starts with the beginning of the estate and continues on for many years after the first customer is activated on our system. To only be able to claim Broadband Connect subsidy for the first 12 months after activation will greatly limit the amount of customers we could provide this subsidy to.

Many houses can take up to 18 months or more to build and the sale of land in these estates is generally on a staggered basis. By implementing the 12 month ruling a great number of people who don't build immediately, or purchase land some time after the first customer is activated on e-wire Broadband will be ineligible for the Broadband Connect subsidy. Many of these areas also find themselves without ADSL availability and so would have no further option other than dial up internet.

BES proposes that further discussion needs to be held between both parties to agree on a more suitable time frame to be able to provide the most benefit to all parties involved in Broadband Connect – or at least, in our circumstance, some means by which interpretation of the guidelines might be more flexible.

As has been outlined in prior correspondence with your Office (and the Minister) the service provided by BES and e-wire is significantly different to that of other infrastructure providers due to the long lead time of implementation of services and the fact that we are dealing largely with Greenfield estates who lack the general infrastructure that established communities and towns have access to already.

While there is also a number of other areas where certain aspects of the Broadband Connect Program are not entirely clear, and/or require further discussion as to how certain guidelines might be interpreted, these might best be discussed on a face-to-face basis at some mutually convenient future time.

*Graham Bowman,  
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Monday, January 16, 2006*