



## **Review of sunseting payphone instruments**

Submission by the Australian Communications Consumer Action  
Network to the Department of Infrastructure, Transport, Regional  
Development and Communications

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## The National Rural Women’s Coalition

The National Rural Women’s Coalition (the NRWC) is a grass roots organisation, established in 2002, that works to support and grow vibrant rural, remote, and regional communities throughout Australia. The NRWC seeks to ensure better social, economic, and environmental outcomes for women in rural townships, in rural communities and in primary production throughout Australia.

The NRWC provides a collaborative, powerful national voice for women living in rural, regional, and remote Australia through:

- Representing the diverse views and voices of women in rural, regional, and remote Australia
- Providing advice to the Australian Government on policy issues relevant to the views, circumstances and needs of rural women
- Contributing to building a positive profile of rural women, their achievements, and their issues.

We believe it is important that the unique views of rural women who reside in the numerous rural, remote, and regional communities throughout Australia as farmers, businesswomen, community leaders and volunteers, have substantial input into consultations about their communities, industries, needs and issues, including any matters relating to women’s rights, gender equality and discrimination.

We are one of six Alliances funded Violence against Women and Children continues to be a significant social and health issue particularly for Women and Children in rural, regional, and remote areas of Australia.

## Introduction

The NRWC welcomes the opportunity to provide this feedback to the Department of Infrastructure, Transport, Regional Development and Communications on the '*Review of sunseting payphone instruments*'.

The National Rural Women's Coalition has received from women, girls and their community's feedback on their experiences and expectations of tele-communications. Reliable, affordable and accessible telecommunications is the catchcry for many communities and rural and remote women.

The NRWC welcomed the announcement of free phone calls from what were previously referred to as pay phones and should now be referred to as public phones, and we especially are happy to more Telstra Air WiFi has been connected through the Telstra public phone boxes so that more women can connect with services.

During times of disaster or crisis the Telstra public phone box has become the symbol through-out rural, regional and remote Australia of safety. A guaranteed and safe way to contact emergency services, loved ones and medical services. The phones are universally available no matter the users, age, background, social status, gender or location. The existence of the Telstra Payphone makes communities feel connected and safe.

The NRWC is keen to see careful, considered and community led future expansion of rurally situated Telstra public phones. We do not believe that all rural, regional and remote communities understand the process of gaining the benefit of an installation of a public phone or the process that is used to remove a public phone. It can be argued that the removal of phones, some 19,000 in ten years, and with the removal it means users have less access to phone and the services that the individuals need to contact which leads phones to appearing to be used less, and therefore becoming a self-filling prophecy of decline.

We note that remote indigenous communities have a comparatively higher usage even though there are only 500 available so more payphone is more remote communities is recommended.

## NRWC Recommendations

The NRWC's has twelve recommendations for the Department of Infrastructure, Transport, Regional Development and Communications to consider:

### **Rules for Location, Installation and removal of USO payphones**

1. Rural, Regional and Remote Communities need more education on the process to have public phones, preferably with WI-Fi Hotspots, installed
2. All public phones should include a WI-FI Hotspot to provide greater access to services, including access to tele-health and social services.
3. Public phones should be considered an essential service and therefore accessible to everyone no matter where they live whilst we recognise the lessening need in cities with the increase of mobile usage

4. A review of net social benefit should be undertaken which takes into consideration, removal of commercial viability of the public phone, the revenue Telstra receives from the phone and the call usage and include other social determinates of a community or area such as socioeconomics, susceptibility to disaster and drought, distance from services including 24 hour emergency services.
5. Public phones need to be located in areas not where there is no terrestrial mobile coverage or where coverage is inadequate without the additional of, for many, additional equipment.
6. Public phones in areas of high risk of vandalism or misuse is not a determinate for removal but rather a determinate for regular monitoring and maintenance.
7. The number of public phones should not be reduced below the current 2012 number of 15,000. Phones removed from metro areas should be repurposed with Wi-Fi to rural and remote areas

#### **USO Payphone Standards and Performance**

8. Maximum to six months (not nine months) for the installation of new public phone with a preference for under three months should be implemented.
9. Maximum timeframes for repair and critical faults be 10 working days across all areas.
10. Remote repairs benchmark should be equal to the urban and rural categories of meeting or not exceeding 90% of cases.

#### **Rules for consultation and complaints involving the location and removal of USO payphones**

11. Community consultation on the removal of public phones and the net social benefit test needs reviewing to ensure there has been thorough engagement with communities not just the notification through a local newspaper of impending removal given the lessening number of regional and rural newspapers being published. (Newspapers are an absolute luxury in some households.) No submissions to Telstra on a removal consultation is NOT a benchmark for removal it simply means the consultation has not been completed appropriately. In some communities' diverse methods of consultation need to be undertaken including on the ground town meetings with Telstra staff.

#### **Telecommunications Universal Service Obligation (payphone Complaints Rules) Determination 2011**

12. All complaints should be reviewed regarding the relocating or removal of a public phone. The dependence on the public consultation process that is currently being used and, in some cases, not receiving any submissions is clearly not reaching affected users. Therefore, written complaints should be addressed as part of the removal consideration. Written complainants may well be representing more users or a group of users. EG a shop owner representing a group of customers that use the payphone and purchase from the store.