



**Internet Society of Australia**  
**A Chapter of the Internet Society**

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Colin Lyons  
Chief General Manager  
Expert Taskforce Secretariat  
Department of Communications, Information  
Technology and the Arts  
By email: [colin.lyons@dcita.gov.au](mailto:colin.lyons@dcita.gov.au)

Dear Colin

Re: Terms of Reference for the Expert Taskforce

The goal of the Internet Society of Australia (ISOC-AU) is a high-quality, open and global Internet that delivers benefits to all Australians and people around the world. Because the Internet is the central driving factor in the need and demand for broadband, ISOC-AU has a direct interest in the outcomes of this Taskforce and its assessment of proposals for broadband network infrastructure. Our preliminary comments on the Taskforce Terms of Reference are as follows:

- We note that the assessment of proposals for broadband will only relate to infrastructure in metropolitan and major regional centres. Because ISOC-AU objectives are for broadband infrastructure throughout Australia, we strongly support other Government initiatives to ensure broadband infrastructure reaches all Australians.
- The announced Taskforce members are clearly highly competent individuals. However, the Terms of Reference call for assessment of technical issues such as service standards, scalability, capacity and speeds. We would expect that the Taskforce will seek effective technical input from a range of sources and have technical assistance in its assessment processes, and that the technical advice will be, as far as possible, publicly available. Much of the broadband debate is directly linked to the provision of Internet access. The novel nature of Internet technology means that it can be difficult to develop soundly based policy processes, and ISOC-AU seeks direct input to the Taskforce to provide this input to avoid premature foreclosing of technical, business or social options.
- The Term of Reference under Task (A)(2) is for the Taskforce to include, in its assessment, 'proposed pricing principles for access...'. Given the ACCC's experience and expertise in pricing principles for access to infrastructure, the Taskforce should seek substantial advice from the ACCC on this issue. This Term of Reference also appears to open up the issue of the USO levy, and whether contribution to the cost of the USO should be folded into interconnect prices, or remain as a separate levy on participating carriers. Because of the importance of the USO as the mechanism through which all Australians are guaranteed access to at least voice level service, which can then be upgraded as technology permits, review of the USO and its funding should be the subject of a separate review.
- We note that the Term of Reference under Task (A)(3) is both to enable the high speed broadband network, and 'avoid investment in duplicate networks, if they are economically inefficient'. This Term of Reference must be balanced against the stated

aim of the process - 'open access' - and, in its 'considerations' for the Taskforce, the Government's ongoing commitment to 'robust' competition. Specifically, if the Taskforce recommendations favour only one broadband network proposal, that network proposal must be accompanied by strong commitments to ensure other service providers can use that network to offer customer choice, recognising that choice may also be provided through the use of different technologies that may be more appropriate in different geographic locations. Effective competition is essential for continued development of the Internet. ISOC-AU considers that this process can provide Australia with an excellent opportunity to develop an effective competition regime that will support both business competitiveness and sound social development throughout Australia.

- The first Term of Reference (Task A) refers to the Taskforce development of 'guidelines and specifications'; the second and third Terms of Reference, (Task B and C) however, only talk about the 'guidelines'. We assume that, if specifications are developed separately from guidelines, both will be available for public comment.
- The Taskforce timeframes are fairly short - only three weeks will be allowed for public comment on the Taskforce guidelines once they are released.

We also support the 'considerations' listed for the Taskforce, including the Government's 'strong ongoing commitment that all people in Australia have access' to quality telecommunications services.

We support this initiative to improve public access to high speed quality broadband infrastructure, and would look forward to being involved in any further consultation processes.

Yours sincerely

Holly Raiche  
Executive Director, ISOC-AU