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30 May 2023

Director, Regional Connectivity
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594, Canberra ACT 2601

To Whom it May Concern,

Re: Mobile Network Hardening Program – Round 2 Grant Opportunity Draft Guidelines

On behalf of the Greater Whitsunday region, we are pleased to provide comment on the Mobile Network Hardening Program – Round 2 Grant Opportunity Draft Guidelines.

Greater Whitsunday Alliance (GW3) is the peak independent, economic development organisation for the Mackay, Isaac, Whitsunday region, creating opportunities for the Greater Whitsunday region to realise its full potential. GW3 delivers a range of economic development focused projects to help support and promote prosperity across the region, in partnership with regional agencies, industry and the Mackay, Isaac and Whitsunday Regional Councils.

The Greater Whitsunday region is home to 180,894 people, a land area of 9.01 million hectares and a diversified regional economy with total annual outputs of just over $51 billion. Located in the strategic heart of Northern Australia, Greater Whitsunday is one of Australia's economic powerhouses, with substantial contribution to Queensland's employment, output and exports underpinned by the strength and depth of its knowledge-intensive mining, advanced manufacturing, agriculture, transport, tourism, and construction industries.

The Greater Whitsunday region requires active investment in telecommunication and connectivity services to meet current challenges and to strengthen regional well-being and prosperity into the future. As a geographically diverse region, telecommunications service levels vary across Greater Whitsunday, from well-serviced urban centres to isolated nature-based tourism locations and rural agricultural townships, with little to no internet connectivity or mobile coverage. The importance of effective and reliable telecommunications was highlighted during the Cyclone Debbie event in 2017 as a critical element in the region's preparedness and recovery response.

Funding commitments, like Mobile Network Hardening Program – Round 2, ensure those areas in Greater Whitsunday that will benefit from preventing, mitigating and managing mobile network outages during and/or after Natural Disasters, can seek investment in connectivity solutions and improvements.

GW3 led the establishment of the *Greater Whitsunday Regional Digital Connectivity Forum (RDCF)* in partnership with Mackay, Isaac and Whitsunday Regional Councils and Regional Development Australia – Greater Whitsundays. In late 2022, GW3 released the *Greater Whitsunday Digital Roadmap* which aims to set a pathway to improve digital connectivity, accelerate technology adoption and enhance digital workforce skills in the region. Key Roadmap strategies are linked to delivering digital infrastructure investment required to withstand natural and community disasters.

This submission provides comment on relevant aspects of the Draft Guidelines. GW3 and partners are committed to advocating for greater regional connectivity and coverage in the Greater Whitsunday region. Should you have any questions at all, please don't hesitate to contact me.

Yours faithfully,
GREATER WHITSUNDAY ALLIANCE

Greater Whitsunday Alliance (GW3) Comment on Design

Mobile Network Hardening Program – Round 2 Grant Opportunity Draft Guidelines

Below are key elements from the Draft Guidelines that GW3 are pleased to provide comment for consideration and review.

GW3 welcomes the Mobile Network Hardening Program given the instances and intensity of natural disasters in regional and rural Australia, including within the Greater Whitsunday region.

Reliable power supply to telecommunications assets was identified as critically important by regional stakeholders during the development of the *Greater Whitsunday Digital Roadmap* in 2022. During times of natural disaster or community emergency, access to communications, power, and clean water are critical to safety and recovery.

During Cyclone Debbie in March 2017, more than 5.9 million messages were sent to Queenslanders showcasing how critically important reliable telecommunications are during these events to warn the community of possible threats and send emergency messages.

Despite extended periods of power outages affecting communication, councils continued to push messages focused on service delivery, power outages, water supply, waste collection and clean-up activities via Facebook pages and council websites as soon as they were able. Ensuring the community can stay connected to this information is vital.

It is also noted that in Cyclone Debbie, the deployment of additional SES resources to support local crews was impacted as some alerting text messages failed to get through due to power outages.

A recommendation from the Queensland Government's *Cyclone Debbie Review* is – To mitigate the loss of power, communications and water, the requirements of utilities during restoration should be considered in the continuity plans of councils, businesses and residents.

The Mobile Network Hardening Program will assist councils, businesses and residents to ensure they have contingencies that communities are aware of, and can activate should critical communication infrastructure be lost.

2.1   Better Connectivity Plan for Regional and Rural Australia
- *Re: The Australian Government is committed to increasing connectivity, bridging the digital divide, improving mobile coverage and protecting communities against natural disaster. The Better Connectivity Plan for Regional and Rural Australia, announced in the October 2022 Budget will see more than $1.1 billion delivered to communities across regional and rural Australia.*

GW3 and partners commends the Department and Australian Government for the investment of over $1.1 billion in the Better Connectivity Plan for Regional and Rural Australia, including Round 2 of the Mobile Network Hardening Program.

Engaging with regional and rural Australia to determine connectivity solutions, particularly in times of natural and community disaster, is critical in closing the digital divide and raising the service standards experienced outside major cities.

Much of regional and rural Australia experience devastating natural disasters – cyclones, flood, bushfire – in a more frequent and intense pattern. Reliable telecommunications and connectivity before, during and after these events is critical to community safety, response and resilience.

GW3 and our regional partners are in strong agreement with the Department's guideline to see greater collaboration across federal, state and local government to align strategic funding priorities and program delivery. This is reflected as a core action contained in the *Greater Whitsunday Digital Roadmap.*

3.3   Third Party funding co-contribution
- *Re: All projects will be expected to leverage a substantial financial (cash) co-contribution to the capital costs*

Consider more detailed explanation of the applicability of 'in-kind' contribution (ie, the "market" value of peppercorn lease agreements with State Government/Councils/landowners) and the impact of these agreements on application eligibility and merit. In Queensland, the draft State Infrastructure Strategy clearly states on Page 94: "While the Queensland Government is a strong advocate for improved digital infrastructure to grow the economy and provide more digital services, the Australian Government and the private sector are responsible for the majority of infrastructure."

There is no allocated Queensland State Government budget to support digital co-contribution activities, which places the Greater Whitsunday region (and conceivably all Queensland applications) at somewhat of a disadvantage.

Therefore, the likely sources of financial (cash) co-contribution will be local councils, who may not have access to budgeted and approved funds for projects within the timeframe allowed for Mobile Network Hardening Program applications, limiting their ability to make full and properly made applications.

5.1   Eligible Grant Activities

To be eligible, each proposed Resilience Upgrade under Round 2 of the Program must:
- *demonstrably increase the resilience of a mobile telecommunications service, or multiple mobile telecommunication services (multi-MNO outcomes), that directly provide mobile coverage to an Eligible Location (section 5.2);*
- *enhance the resilience of mobile telecommunications service/s against an identified risk that arises from a Natural Disaster that could reasonably expect to threaten the service; and*
- *not have started construction or be part of the participating telecommunications provider's forward build network or upgrade plans from the period commencing from the date the Grant Opportunity opens until 30 June 2027.*

For example, a Resilience Upgrade may include:
- *upgrading power capacity to a minimum of 12 hours;*
- *provision of redundant backhaul;*
- *flood elevation;*
- *emergency power solutions, including generators, to rapidly restore services during or after a Natural Disaster event;*
- *expanding or enhancing a protection zone around a site to increase its resilience to a Natural Disaster threat; or*
- *other hardening measures to increase the resilience of a site.*

GW3 agrees with the activities outlined in the draft guidelines and offers the below points for consideration:

- Extend the minimum power capacity to greater than 12 hours in recognition of the time to reinstate sufficient power after extreme weather events like cyclones, flood or bushfire
- Access to back up power solutions by local personnel during or after a natural disaster (ie, generators will need refuelling)
- Greater weighting for renewable and reliable energy solutions like solar as backup power sources
- Include technology, like sensors or IoT solutions, to assist in the monitoring of power to critical telecommunications infrastructure before, during and after natural disasters

5.2   Eligible locations

- *Re: Ineligible Areas are: Urban Centres and Localities geographical units classified by the Australian Bureau of Statistics as 'Major Urban', ie, with a population of 100,000 or more.*

Consider greater clarity around the eligibility of smaller townships within 'Major Urban' locations, ideally determined at SA2 scale.   Ambiguity on eligibility of 'Major Urban' areas may inhibit potential applications.

During Regional Connectivity Program Round 2 applications, GW3 determined with the Department that despite the Mackay LGA being classified as 'Major Urban' with a population over 100,000 people, the small township of Finch Hatton was eligible and successful with an application.

Clarity around the eligibility of larger regional areas is critical to ensure smaller towns lacking in sufficient coverage and connectivity are not excluded from this funding opportunity.

GW3 recommends applying SA2 scale to eligibility criteria or releasing detailed mapping of eligible locations or provide further clarity regarding smaller townships within Major Urban locations.

GW3 wish to thank the Department for the opportunity to review the Draft Guidelines and make a submission. Should the department require any further information please feel free to contact GW3 direct via ███████████████████████████████████████