



Every Queensland  
community deserves  
to be a liveable one

11 May 2023

Mr Jim Betts  
Secretary  
Department of Infrastructure, Transport,  
Regional Development Communications and the Arts

[MBSP@infrastructure.gov.au](mailto:MBSP@infrastructure.gov.au)

Dear Mr Betts

### **RE: Round 2 of the Mobile Network Hardening Program Draft Guidelines**

The Local Government Association of Queensland (LGAQ) is the peak body for local government in Queensland. It is a not-for-profit association established solely to serve councils and their needs. The LGAQ has been advising, supporting, and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities.

The LGAQ does this by connecting councils to people and places; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and providing them with the means to achieve community, professional and political excellence.

The LGAQ would like to offer brief feedback on the guidelines for Round 2 of the Mobile Network Hardening Program.

#### **Mobile Network Operator (MNO) and Infrastructure Providers**

This funding, like most funding for the mobile telecommunications industry, is only available to MNOs. However increasingly there are businesses that operate solely as providers for infrastructure, rather than being commercial providers of mobile services. As these infrastructure providers become more common the legislation and guidelines for government funding must be adjusted to include these organisations in order to offer opportunities for funding to be accessed to either create new infrastructure or repair and upgrade existing infrastructure.

The LGAQ expects that government will work with non-MNOs who are investing in infrastructure to find models for return on investment that will lead to better coverage in more rural and remote areas, including our First Nations communities. As such the LGAQ urges amendments to areas of the eligibility criteria in the funding guidelines (4.1 in the draft guidelines) to reflect this emerging industry and how it could be supported to optimise community outcomes.

#### **Eligibility and Forward Planning**

The stipulation that "...be part of the participating telecommunications provider's forward build network or upgrade plans" (5.1 *Eligible Grant Activities*) may make sense as far as not having MNOs access the funding for what should be routine maintenance costs, however this caveat also discourages any MNO or infrastructure provider from any forward planning for network resilience or re-design.

A review of how this funding in managed should occur, with an end goal to encourage strengthening and resilience planning for networks in remote and regional areas as part of business as usual – rather than being disincentivised for these activities when funding has not been announced. The time frame for infrastructure plans to be developed, locations to be identified, projects fully costed, and



drafting funding applications is much longer than any usual government funding round would be open for. As such, MNOs may not commit fully to developing these projects, especially in areas where the return on investment is questionable or very long term.

We recommend there is a renewed look at how funding can be used for systematic upgrades or re-builds, in order to develop quality infrastructure planning for the most vulnerable communities who are frequently without communication in the wake of weather events and natural disasters.

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Yours sincerely,

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