



30 May 2023

The Hon Michelle Rowland MP  
Minister for Communications  
PO Box 6022  
House of Representatives  
Parliament House  
Canberra ACT 2600

Via: [michelle.rowland.mp@aph.gov.au](mailto:michelle.rowland.mp@aph.gov.au)

Dear Minister,

**RE: One Gippsland – Submission on the Mobile Network Hardening Program Round 2 – Draft Grant Opportunity Guidelines**

One Gippsland is pleased to present this submission to provide feedback on the Australian Government’s Mobile Network Hardening Program Round 2 – Draft Grant Opportunity Guidelines of your consideration.

It is One Gippsland’s position that significant investment into digital connectivity infrastructure in the Gippsland region has not kept pace with demand. Fuelled by increasing natural disasters, population growth pressures and increasing data requirements, our communities are left with an incomplete service and in the event of a natural disaster are under prepared to act and respond.

By strengthening connectivity through improved infrastructure in our communities is a core pillar of the One Gippsland’s policy platform and our members support the Federal Government’s initiative to future-proof the mobile network.

**About One Gippsland**

One Gippsland is a peak advocacy alliance representing the region - bringing together local government, industry leaders and education providers. The Alliance currently includes Gippsland’s six local government CEOs and Mayors, Food & Fibre Gippsland, TAFE Gippsland, Gunaikurnai Land and Waters Aboriginal Corporation and Federation University (Gippsland Campus).

Gippsland is a geographically, socially and economically diverse region. At approximately 41,000 km<sup>2</sup>, Gippsland is the largest region in Victoria. It is home to over 270,000 people, six Local Governments and produces \$14 billion in Gross Regional Product (GRP) annually.

It is our aim to support collaboration between government, business and community, while collectively championing the interests of our region and our people.

Should you have any questions, please do not hesitate to contact our Secretariat [REDACTED]

Yours sincerely,  
[REDACTED]



## Mobile Network Hardening Program Round 2

### Draft Grant Opportunity Guidelines

### Submission

One Gippsland welcomes the opportunity to provide feedback on the Australian Government's **Mobile Network Hardening Program Round 2 – Draft Grant Opportunity Guidelines**.

Strengthening connectivity through improved infrastructure in our communities is a core pillar of the One Gippsland's policy platform. Due to Gippsland's geographical size, terrain, population spread and propensity for natural disasters, Gippsland is particularly vulnerable to the impacts of poor digital connectivity and mobile coverage.

One Gippsland recognises that Round 2 of this Program has up to \$15 million (GST exclusive) of funding available and its key objectives is to co-fund Mobile Network Operators (MNOs) or those contracted by an MNO to maintain and upgrade network infrastructure to:

- Help prevent outages in the event of a natural disaster;
- Strengthen the resilience of telecommunications facilities to allow them to operate for longer; during bushfires and other natural disasters; and
- Enable the rapid restoration of services following an outage.

It is One Gippsland's position that this is an important fund that should meet the needs of our community as outlined below.

### About Gippsland and One Gippsland

Gippsland is a geographically, socially and economically diverse region. At approximately 41,000 km<sup>2</sup>, Gippsland is the largest region in Victoria. It is home to over 270,000 people, 6 Local Governments and produces \$14 billion in Gross Regional Product (GRP) annually.

One Gippsland is the peak advocacy body alliance representing the region, bringing together local government and industry leaders.

It is our aim to connect the dots between government, business and community, while also collectively working together to champion the interests of our region and our people.

One Gippsland members include the Mayor/Chair and CEO (or equivalent) of the following organisations:

- Bass Coast Shire Council;
- Baw Baw Shire Council;
- East Gippsland Shire Council;
- Gunaikurnai Land and Waters Aboriginal Corporation;
- Federation University – Gippsland Campus;
- Food and Fibre Gippsland;
- Latrobe City Council;
- South Gippsland Shire Council;
- TAFE Gippsland; and
- Wellington Shire Council.

## One Gippsland's Digital Connectivity Issues

Investment into digital connectivity infrastructure in the Gippsland region has not kept pace with demand. Fuelled by increased instances of natural disasters (some of the worst seen in Australia's history), urban growth pressures and increasing data demands creating grey spots, our communities are left with an incomplete service. This means in the event of a natural disaster our community's ability to act and respond is significantly impacted.

The Australian Digital Inclusion Index (ADII) 2020, which measures the level of digital inclusion across the Australian population, **puts the Gippsland region nearly 13.6 points behind inner-city Melbourne.**

Although this gap has decreased marginally over the past few years, the divide is not resolving quickly enough. Even within 'well served' regional areas, users regularly face issues in accessing the same reliable and high-capacity mobile coverage levels enjoyed by those in metropolitan capitals like Melbourne.

## Fast Facts on Digital Connectivity

In 2019, [a Gippsland Digital Plan](#) was developed to articulate the region's current gaps in digital infrastructure and where future demands may lie.

The development of the plan was a collaborative process that sought the views of the regional leaders, the business sector, community groups and local government. Market experts were also engaged and existing strategies and technical papers were reviewed to formulate the plan. The findings of the consultation revealed the key regional digital connectivity issues:

- **Place based Mobile Blackspots:** 496 registered mobile blackspots throughout the region;
- **Place based Fixed Line Broadband:** 72% of the regions cities and towns identified an "intermediate" supply shortfall in access to fixed line broadband;
- **Tourism Fixed Line Broadband:** 68% of key tourism locations identified a "major" supply shortfall and 32% have an "intermediate" supply in access to fixed line broadband;
- **Tourism Mobile:** 12% of key tourism locations identified had "major" supply shortfall and 24% had an "intermediate" supply shortfall for mobile coverage;
- **Agriculture Fixed line Broadband:** 100% have a "major" supply shortfall in fixed access broadband services for business users across the 5 key primary production regions;
- **Agriculture LP-WAN:** 60% have an "intermediate" supply shortfall for LP-WAN IoT supported services were identified across the 5 key primary production regions;
- **Freight Mobile:** Two class A roads and two key class B had "major" supply shortfalls mobile coverage; and
- **Road Mobile:** all 113 C classified roads within the region had "major" supply shortfalls mobile coverage.

## Issue 1 - Gippsland's Geography and Population Density

Much of Gippsland's connectivity issues come from its geography and terrain. Gippsland is Victoria's, and one of Australia's, largest regions at 41,000 km<sup>2</sup>. Due to Gippsland's size, its diverse terrain which includes mountainous peaks and deep valleys, and its population density (40% live in towns of less than 1000 people)<sup>1</sup>, there are large digital and mobile connectivity gaps - which to date have not been commercially viable for MNOs or the NBN to close.

Although this program is intended to work in conjunction with the other digital connectivity programs to provide bespoke solutions, there is still a heavy focus on solutions provided by commercial entities.

One Gippsland is concerned that commercial entities may not prioritise improving digital connectivity in geographically challenging areas such as Gippsland. This overlooks the high risks that Gippsland faces if 'grey' or 'black' spots in coverage are not fixed.

### RECOMMENDATION

**One Gippsland recommends that regions with challenging geography and terrain are rated higher for investment; to ensure that providers are encouraged to submit proposals for our region through this program.**

## Issue 2 – Population Density and Tourism Hot Spots create Grey Spots

As the intent of the Network Hardening Program implies, access to sufficient digital connectivity can be a matter of life and death.

Bushfire and flood prone Victoria, which has had more than 40 registered natural disasters between 2018 and 2023 (March)<sup>2</sup> underscores the need for more resilient and accessible broadband and mobile telephone infrastructure to facilitate reliable communications during bushfires and other emergencies.

Natural disasters often occur in regional areas that are popular with tourists, on the fringe of growing regional cities and peri urban areas. This is especially evident with the Local Government Areas of Bass Coast and Baw Baw Shires which are two of the state's fastest growing municipalities and expected to grow by almost 30 per cent by 2036<sup>3</sup>, and 55 per cent by 2041<sup>4</sup> respectively.

As outlined above, Gippsland has 496 registered mobile 'black spots' throughout the region, these are areas that receive no mobile or network coverage.

'Grey spots' are also an emerging significant issue for Gippsland, meaning there are areas that may have adequate connection at low demand times but access becomes unreliable or inaccessible during peak periods. This could be during school holidays and peak tourist seasons, or in much more life threatening cases such as communities converging in the event of a natural disaster.

According to Mobile Network Operator coverage maps for Gippsland regional cities and towns as well as significant road and rail routes within Gippsland which are all areas of high demand during a natural disaster are categorised as having between high and intermediate mobile coverage.

However, consistent community feedback and anecdotal evidence suggests that coverage quality is significantly less than what is stipulated in these maps, particularly in areas that are growing quickly or

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<sup>1</sup> Gippsland Regional Plan Project Control Group (2010) Gippsland Regional Plan. Regional Development Victoria.

<sup>2</sup> <https://www.disasterassist.gov.au/find-a-disaster/australian-disasters?state=vic>

<sup>3</sup> <https://forecast.id.com.au/bass-coast/population-summary>

<sup>4</sup> <https://forecast.id.com.au/baw-baw>

during peak tourism periods. Grey spots do not allow users to access adequate communication services when they need it most – staying informed during a natural disaster.

Addressing grey spots as part of a program that is designed to ‘harden’ the network during a natural disaster should be a priority.

## RECOMMENDATION

**It is recommended that in the context of the Mobile Network Hardening Guidelines Round 2 there is consideration of the impact of both ‘black spots’ and ‘grey spots’, which are likely to occur in growing communities that interface bushfire and flood prone areas.**

## Issue 3 – Digital Connectivity as an Essential Service

Due to its size, composition of national and state parks and the spread of its population (as outlined above) Gippsland is particularly vulnerable to natural disasters like bushfires and floods. Since 2018, the Gippsland region has experienced 33 different natural disasters,<sup>5</sup> which have significantly impacted connectivity infrastructure and communities.

In 2019-2020, the Black Summer fires were devastating for Gippsland, accessing reliable information became front of mind for those in life threatening situations, with fast and unpredictable fires burning through connectivity dead zones.

Therefore, One Gippsland recommends that telecommunications are recognised as an essential service, and providers must be required to meet service continuity standards to prevent significant, prolonged and widespread outages during natural disasters.

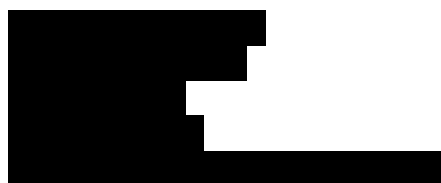
Arrangements to strengthen infrastructure resilience (or network hardening) need to respond to the specific context of the infrastructure, for example:

- The design life of battery backup needs to reflect the setting of the installation and the likelihood and duration of isolation;
- Infrastructure to have at least 48 hours of auxiliary back-up power to avoid outages during this time. This issue needs to be considered in the context of the use of digital communication by emergency services as a primary means to get information to communities about the fires; and
- Infrastructure investment in the context of network hardening needs to consider the growing issue of ‘grey spots’ particularly in One Gippsland areas which have high-levels of visitation. Strains on the network to high visitation could be disastrous during an emerging natural disaster.

## RECOMMENDATIONS

**It is recommended that telecommunications are recognised as an essential service, and providers must be required to meet service continuity standards to prevent significant, prolonged and widespread outages during natural disasters.**

## For Further Information



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<sup>5</sup> <https://www.disasterassist.gov.au/find-a-disaster/australian-disasters?state=vic>