

26 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: Peri Urban Councils Victoria – Submission on the Mobile Network Hardening Program Round 2 – Draft Grant Opportunity Guidelines**

Peri Urban Councils Victoria (PUCV) 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 the position of PUCV that significant investment into digital connectivity infrastructure in the Gippsland region has not kept pace with demand. Fuelled by increases in 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.


Strengthening connectivity through improved infrastructure in our communities is a core pillar of the PUCV's policy platform and our members support the Federal Government's initiative to future-proof mobile network connectivity.

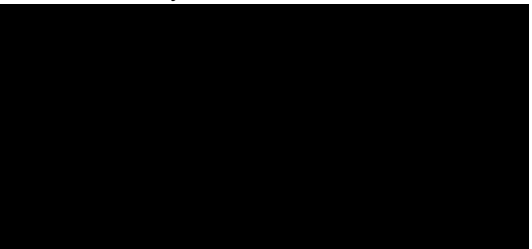
**About Peri Urban Councils Victoria**

The PUCV represent those Victorian council shires that are immediately adjacent to Metropolitan Melbourne and Geelong and is the leader in advocating for Victorian peri urban support and solutions by engaging with one voice at the local, state and national level. The PUCV:

- Covers an area of more than 11,000 square kilometres;
- Has a population of more than 180,000 Victorians;
- Has 38,000 of residents commuting to employment outside of the region;
- Regions are growing at an average of 1.96% per annum;
- Regions are expected to grow by 47.2%, or more than 100,000 people by 2036;
- Generates more than \$5.3 billion of Gross Regional Product annually;
- Produces \$888 million in agriculture products per annum; and
- Supplies 41 per cent of Melbourne's food needs - including 80 per cent of its vegetables.

The Peri Urban regions of Victoria provide an opportunity for a better balance by providing opportunities for affordable housing and regional lifestyle living. Those seeking to escape the congestion of a capital city and to raise families or enjoy life with a more balanced lifestyle are attracted to these areas which assists in easing population congestion in metropolitan Melbourne.

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

Yours sincerely,  


# Mobile Network Hardening Program Round 2

## Draft Grant Opportunity Guidelines

### Submission

The Peri Urban Councils Victoria (PUCV) 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 PUCV's policy platform.

Round 2 of the 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.

### About Peri Urban Councils Victoria (PUCV)

The Peri Urban Councils Victoria (PUCV) represents those Victorian council shires that interface Metropolitan Melbourne and Victoria's largest regional cities.

The five member councils are:

- Bass Coast Shire Council;
- Baw Baw Shire Council;
- Golden Plains Shire Council;
- Moorabool Shire Council; and
- Surf Coast Shire Council.

### PUCV Fast Facts

The region has an impressive footprint:

- Covers an area of more than 11,000 square kilometres;
- Has a population of more than 198,000 Victorians;
- The population is expected to increase by more than 27% or more than 53,700 people by 2036;
- A total of 38,000 of residents commute to employment outside of the region;
- Generates more than \$5.3 billion of Gross Regional Product annually;
- Produces \$888 million in agriculture products every year; and
- Supplies 41 per cent of Melbourne's food needs - including 80 per cent of vegetables.

## Peri Urban Councils Digital Connectivity Issues

Investment into digital connectivity infrastructure in the peri urban areas of Victoria has not kept pace with demand. Fuelled by urban 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.

## Peri Urban Digital Connectivity Fast Facts

- 297 registered blackspots in the PUCV region;
- Region has a population of over 198,000 Victorians, which almost doubles over the holiday season increasing pressure of connectivity infrastructure; and
- Research conducted by the Regional Australia Institute found the number of Australians working from home in a regional setting doubled between March 2020 and August 2020.

## Focus on Peri Urban Issues in the Network Hardening Program

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 – particularly in peri urban areas – underscores the need for more resilient and accessible broadband and mobile telephone infrastructure to facilitate reliable communications during bushfires and other emergencies.

Telecommunications must be recognised as an essential service and providers must be required to meet service continuity standards that 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 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.
- Infrastructure investment in the context of network hardening needs to consider the growing issue of 'grey spots' particularly in peri urban areas which have high-levels of visitation. Strains on the network to high visitation could be disastrous during an emerging natural disaster.

## Growing Grey Spots in Peri Urban Areas

Due to the prevalence of grey spots in peri urban areas the PUCV submission focuses on this key issue.

Black spots are a well-defined and understood area of investment, however the term 'grey spots' is not well understood and as such is addressed by policymakers in strengthening connectivity across the country.

PUCV states that grey spots occur when digital infrastructure that is in place to service an area is unable to keep up with usage, this can be due to changes in end user technology, system overload due to increased data and population demand. Addressing this issue in the context of natural disasters needs to be addressed.

Rapid population growth coupled by high levels of tourism visitation to peri urban areas has exacerbated the problem with much of the existing telecommunication's infrastructure stretched and therefore under capacity.

We conducted a survey of PUCV Member Councils to gain an understanding of how grey spots are impacting Peri Urban Communities. PUCV Councils have indicated their communities are significantly affected by various digital connectivity shortfalls. These are:

- Patchy connection at specific times of day and/ or specific times of year;
- Patchy connection during bad weather; and
- Patchy connection due to older model telecommunication devices.

#### Grey Spots in the context of Natural Disasters

Peri Urban areas are experiencing a high growth in population, with PUCV members the population is expected to increase by more than 27% or more than 53,700 people by 2036.

All member communities have indicated they experience patchy connection during specific times of day, with 80% of member Councils experiencing patchy connection during specific times of year.

Members have indicated the strain on digital traffic occurs during high traffic times where business and recreation use of the network is higher, such as during peak holiday periods and long weekends.

PUCV states that as our communities are on the urban fringe, where bushfire and flood prone areas are common, the risk of increased demand on the network as people move into our communities needs to be considered. The inability for residents or visitors to receive emergency messages due to grey spots could be catastrophic.

Whilst it is acknowledged that the intent of this program is not on broader network issues – the prevalence of growing grey spots due to increases in population should be considered as part of this program.

## **RECOMMENDATION**

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

**These grey spots are likely to impact the effectiveness of the disaster response and must be addressed to ensure the safety of our communities.**

