

30 July 2024

2024 Regional Telecommunications Review
Secretariat
Department of Infrastructure, Transport, Regional
Development and Communications and the Arts

Via email and online portal: RTIRC@infrastructure.gov.au

Dear Committee

MAYORAL SUBMISSION - 2024 FEDERAL REGIONAL TELECOMMUNICATIONS REVIEW

City of Moreton Bay thanks the Review Committee for the opportunity to provide a formal submission to the 2024 Regional Telecommunications Review to outline the connectivity issues our communities face and to suggest solutions for consideration. A summary of recommendations is provided at the end of this submission, for the Committee's consideration.

Despite its proximity to Brisbane CBD, the city encompasses rural townships and peri-urban areas that continue to experience telecommunications challenges.

Background

City of Moreton Bay is Australia's third-largest local government area by population. It is expected to grow from currently over 500,000 residents to close to 800,000 residents by 2046.

In 2023, Moreton Bay became Australia's newest city. Despite our location on the peri-urban fringe of Brisbane and the Sunshine Coast, the city also includes significant rural areas on the coast and in the hinterland. Roughly 60 per cent of City of Moreton Bay is within an eligible area under the funding guidelines of the Mobile Black Spot Program (MBSP) and the Peri-Urban Mobile Program (PUMP).

Effective mobile coverage benefits the Moreton Bay community in many ways, including:

- **Economic**: Supporting local businesses to broaden their markets and speed up their operations.
- **Safety**: Enabling fast community communications during disasters such as weather and fire events.
- **Transport**: Improving household bandwidth to enable telecommuting with its flow-on benefits.
- **Council digital transformation**: Enabling Council to deliver services, manage assets and engage with the community using digital methods.

Although welcome investments have been made by governments and telecommunications carriers (Telcos) over recent years through programs such as the MBSP, several rural communities within City of Moreton Bay experience ongoing mobile and broadband connectivity issues.

Council is well-placed to contribute to the 2024 Federal Regional Telecommunications Review. Our submission focuses primarily on the following Terms of Reference:

- Equitable access to telecommunications services (1); and
- Suitability of regional communications during emergencies and natural disasters, including reliability, resilience, speed and coverage (4.f).

Experience with the Mobile Black Spot Program (MBSP), Peri-Urban Mobile Program (PUMP) and collaboration with Telcos

Although Council's relationships with Telcos have improved since the last Federal Regional Telecommunications Review in 2021, there is room for further improvement. While City of Moreton Bay has successfully addressed some mobile black spots through Round 1 of the PUMP, challenges persist due to suboptimal engagement with Telcos and complications in deploying funded telecommunications infrastructure projects.

Currently, Telcos generally only engage with Council once grant funding has been awarded. This limited and delayed interaction hinders Council's ability to respond promptly to project needs (e.g. identifying suitable mobile tower locations, development approvals and environmental considerations). Proactive, early engagement between Telcos and local governments is essential to align mobile carrier activities with community needs. This would mitigate delays and foster more transparent communication, ensuring smoother infrastructure development and compliance, especially in environmentally sensitive areas.

While programs such as the PUMP are ideally suited to local government areas with peri-urban settings such as Moreton Bay, Council has been unable to fully leverage these opportunities due to a lack of engagement from Telcos. Currently, Council lacks detailed insights into network vulnerabilities and cannot identify which sites would most benefit from such programs. It is impractical to expect local governments to propose projects without access to comprehensive information on their city's planned network resilience strategies.

City of Moreton Bay urges Telcos to partner actively with local governments to balance network and community needs effectively. Strategic and targeted investments can significantly benefit vulnerable segments of the community, both in our local community and beyond. Collaborative conversations on prioritisation will ensure that the broader Queensland community reaps the maximum benefits from programs such as MBSP and PUMP.

Additionally, Telcos need to be more transparent in providing Council with contractor details for works. There have been incidents of a Telco contractor conducting non-compliant work in an Environmentally Sensitive Area, which resulted in difficulties in the Council's interactions with the Telco and contractor. It would be beneficial for councils to be provided with updates on third-party contractor details so that unsuitable works can be more easily rectified.

Equitable Access to Telecommunications Services

Poor mobile connectivity and inadequate NBN access are significant equity issues affecting residents and businesses across our communities. Parts of City of Moreton Bay including Highvale, Samford, Camp Mountain, Cedar Creek, Mt Glorious, Mt Nebo, Draper, Clear Mountain, Closeburn, Kobble Creek and Mt Samson have poor to no mobile coverage and no access to broadband coverage via the NBN (including fixed wireless services). Federal Government declarations stating that the NBN rollout was "complete" in these townships have left many residents feeling as though their connectivity issues will not be resolved. As a result, many residents are turning to Council to voice their concerns and seek solutions.

This year, Telstra and other wholesalers have begun to decommission poorly performing ADSL services. This move will leave many residents without internet connectivity, forcing them to seek alternatives at a significant financial burden amidst rising living costs. An alternative solution is available for those who can access small satellites in Low Earth Orbit (LEO), such as Starlink. However, these residents must pay a premium for their 'right to connect' compared to their urban counterparts and are subject to price and access variability through a service that is not federally regulated.

Other issues of concern that have been recently reported to Council include:

- Even when NBN services are nearby (e.g. less than 1 km away), residents struggle to achieve reliable internet connectivity; and
- Residents attempting to upgrade from inadequate ADSL connections often find themselves ineligible/out of range for NBN fixed wireless or 4G services and alternatives like satellite services (NBN Sky Muster, Starlink or others) are also reportedly unavailable.

Suitability of Communications Services during Emergencies and Natural Disasters

From an emergency and disaster management perspective, it is imperative to have resilient and reliable telecommunications infrastructure.

Inadequate network visibility proved one of the most significant challenges in responding to the 2022 South East Queensland rainfall and flooding event. Throughout the event, the status of 4G/5G networks in our city was poorly documented and reported to the Local and District Disaster Management Groups (LDMG/DDMG). This exacerbated response difficulties as areas became isolated and communication towers relied on battery power.

This lack of detailed network information impeded accurate risk assessments and contingency planning. It undermined the ability of the LDMG/DDMG to plan and implement alternative connectivity solutions or mechanisms to support community information messaging. This could include a request for support to deploy NBN mobile services, the prioritisation of network repairs or contingency messaging solutions using radio networks or community radio stations.

The LDMG/DDMG and Disaster Coordination Centres were unable to actively monitor the changing risks of telecom blackouts in these areas or when normal network services would be restored. Beachmere (which has a high elderly population and is a vulnerable community) was one such area where, due to limited information provided by Telcos, the LDMG/DDMG and their Disaster Coordination Centres had little intelligence about the network's capability or capacity to support emergency messaging.

Similarly, in areas like Mt Nebo and Mt Glorious, which are prone to bushfires, understanding the impact on service delivery is crucial for timely operational decisions. The ability to accurately map service impacts informs emergency messaging and community engagement during events. If the network fails to support this, alternative time-consuming and high-risk strategies such as direct engagement (door knocks) may be necessary. Implementing live coverage maps would significantly enhance our ability to provide accurate mapping. Additionally, a dashboard accessible to approved users would be a valuable tool for real-time information sharing.

While live coverage maps would be ideal, enhancing the participation of key telecommunications providers in LDMG/DDMG would also represent a significant improvement. Although Telstra and NBN currently have representatives assigned to Moreton Bay's LDMG, their engagement is infrequent and contributions are limited. These representatives' greater involvement and consistent input would substantially strengthen our disaster management capabilities.

Network resilience and reliability

Enhancing the durability of telecommunications infrastructure is essential to ensure they can withstand extreme weather events such as cyclones, floods and bushfires, which frequently impact Queensland. Developing redundant systems and backup power supplies is crucial for maintaining communication continuity during and after disasters. It is particularly important to prioritise these developments in areas vulnerable to isolation and which heavily rely on telecommunications to receive crucial community safety information.

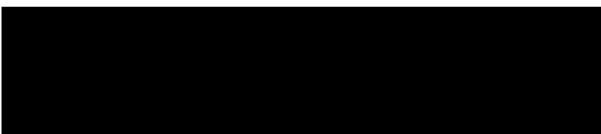
Coverage, connectivity and technological innovation

In addition to addressing gaps in telecommunications coverage in remote and rural areas (as previously discussed), specific strategies might be considered to prevent network congestion during emergencies when usage spikes. These may include prioritising Emergency Alerts to reach those who need them most urgently. Introducing a *Public Safety National Broadband* would also address network congestion by providing first responders priority access to run communications. Further, asset sharing and enabling domestic roaming during a disaster would mitigate service disruptions and enhance recovery efforts.

The accelerated adoption of next-generation technologies such as 5G and advanced satellite communications will further enhance emergency management capabilities. Such networks offer significantly improved speeds, lower latency and greater reliability, which will better allow emergency response teams to manage crises in real time.

Emergency communication systems

There is scope to significantly improve and integrate public warning systems that can effectively disseminate emergency alerts and information to all residents in Queensland. A shared State messaging application to support 'push notifications' would go a long way in redressing current deficiencies. The implementation of interoperable communication systems would also have a positive impact on coordinating the response efforts of emergency services and local government.



Training and capacity building

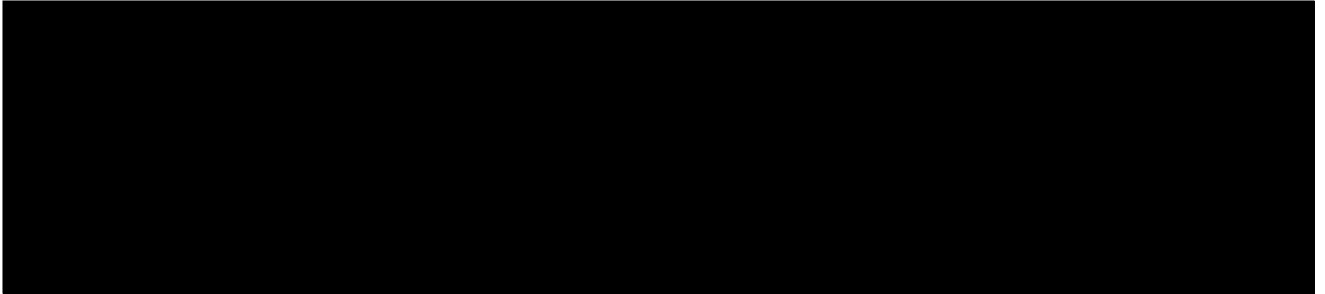
Council advocates that Telcos, local government officials and emergency responders come together to understand better ways of using telecommunications technologies in disaster scenarios.

By addressing these areas, the Regional Telecommunications Review 2024 can significantly enhance the ability of local governments in Queensland to manage emergencies and disasters effectively, ensuring better preparedness, response and recovery efforts.

Summary of Recommendations

1. To ensure that programs such as MBSP and PUMP remain fit for purpose, Council recommends that Telcos be encouraged to engage early with local governments and be required under the program guidelines to establish a single point of engagement for local governments.
2. Council recommends enhancing transparency by requiring Telcos to provide detailed and regular updates on third-party contractor activities. This measure is crucial to enabling timely intervention in cases of non-compliance, particularly in environmentally sensitive areas.
3. Council recommends that the Federal Government reassess and clarify the completion stages of the NBN delivery. Local governments would benefit from advice that can be relayed to affected residents who do not have NBN access despite living in NBN completion zones.
4. Council recommends investigating the feasibility of deploying live coverage maps to facilitate real-time information sharing and enhance disaster preparedness and response capabilities during an emergency.
5. Council recommends that Telcos actively participate in and consistently contribute to LDMG/DDMG general and extraordinary (event-driven) meetings.
6. Council recommends enhancing the durability of telecommunications infrastructure to ensure it can withstand extreme weather events such as cyclones, floods and bushfires.
7. Council recommends further developing redundant systems and backup power supplies to maintain communication continuity during and after natural disasters.
8. Council recommends considering the development of a dashboard that allows Local and District Disaster Coordination Centres to monitor network resilience and performance in near-real time to support community information contingency planning.
9. Council recommends considering the introduction of a Public Safety National Broadband to prioritise emergency alerts and address network congestion during emergencies by providing first responders priority access to run communications.
10. Council recommends facilitating asset-sharing agreements that would enable domestic roaming during a disaster event.
11. Council recommends prioritising the acceleration of next-generation technologies such as 5G and advanced satellite communications to enhance emergency management outcomes.

12. Council recommends investigating improvements to public warning systems, such as shared 'push notification' messaging applications and other interoperable communication systems that would facilitate greater coordination of response efforts between emergency services and local government.
13. Council recommends supporting collaborative training and capacity building between Telcos, local government officials and emergency responders.



Mayor

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