

22 July 2024

Regional Telecommunications Independent Review Committee
The Department of Infrastructure, Transport, Regional
Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

To whom it may concern

Submission to the 2024 Regional Telecommunications Review Issues Paper

Established in 2010, Regional Development Australia (RDA) is an Australian Government initiative that brings together all levels of government to enhance the development of Australia's regions.

RDA Grampians' vision is to promote the economic development of Victoria's west and to position the Grampians region as the place to work, live and do business. Attracting government investment and leveraging regional effort and expertise is critical to achieving this vision.

Telecommunications play a crucial role in regional areas, impacting various aspects of community life, economic development, and emergency preparedness. Linking residents, businesses, and local government agencies, connectivity enables people to stay in touch, access information, and communicate effectively across distances.

Reliable telecommunications infrastructure supports economic activities in regional areas by facilitating business operations, commerce, and trade. It enables businesses to engage in e-commerce, digital marketing, and online transactions, thereby expanding market reach and enhancing competitiveness.

Any initiative that extends the geographic coverage of mobile calling and mobile data reception in rural and remote areas will benefit these communities in terms of both daily connectivity and connectivity during emergencies. As such, RDA Grampians supports any measure that encourages providers to expand their networks. This include allowing the sharing of new and existing transmission infrastructure between providers to make its operation commercially viable or the provision of grants, incentives or subsidies to telecommunications providers to establish coverage in areas where it is not presently viable for them to do so. Our preferred approach is for the Government to encourage a policy setting whereby the telecommunications providers can cooperate in extending coverage to marginal remote and rural areas and for Government to intervene in the market only if/where this is not succeeding.

For the past five years, RDA Grampians has been advocating for mandatory mobile roaming to allow user access to any mobile network (infrastructure and radio spectrum) during declared emergency situations in rural and regional communities. We wrote the technical reports, secured the support of the RDA network nationally, advocated to Ministers and brought the ACCC to the table for an inquiry with the Telcos. Any effort to improve mobile telecommunications performance in regional Australia is welcomed by our committee. In this submission we will raise our general



views on emergency mobile roaming and will respond specifically to certain questions in the Issues Paper.

The issue of emergency roaming was raised in the 2020 Royal Commission into Natural Disasters hearing. During the 2019/20 bushfires regional residents and visitors' ability to contact their families and access emergency apps and alerts was limited to the network range of their mobile provider. This is an issue which is repeatedly highlighted by the recent bushfires and flooding in the eastern States. Alerts, general information, and personal messages about disasters are communicated using a mix of voice, text, and online applications that utilise mobile broadband.

The Regional Telecommunications Independent Review Committee (RTIRC) recommended in its 2021 review that the Government undertake a feasibility study to consider the capability for mobile roaming to be deployed in emergency circumstances, which was the genesis of the ACCC inquiry.

In 2023 the ACCC Regional Mobile Infrastructure Inquiry final report was released, which resoundingly supported substantial advancements in the pursuit of mobile roaming. It recommended that both the Government and industry collaborate to establish frameworks and protocols for the seamless initiation and deactivation of temporary mobile roaming.

Following this, Telstra announced they were working with all network providers to develop a temporary disaster roaming (TDR) solution to enable mobile roaming between networks within a localised area during natural disasters, for a short, specified duration. TDR capability was referenced in the Issues Paper which we are providing comment on.

While delighted to see a commitment from Telstra and the Australian Government to scope TDR capability, we have concerns with the process of TDR development and the mechanics of its usage. To date this process appears to have been captured, driven and led by the mobile network operators, where decisions are guided by commercial operations, and not necessarily having the safety of rural and regional people at the forefront of this process.

The concerns we have in response to the TDR Preferred Scoping report include:

- The exclusion of international roaming customers from the preferred scope document. Many areas of Regional Australia attract significant levels of International Tourism, such as the Grampians National Park in our region.
- Defining and expansion on the definition of a 'disaster'. The scope document excludes events deemed to be *operational issues*, meaning network failures such as the CloudStrike outage experienced globally on 19 July 2024. During network failure events mobile broadband services to regional communities may be unaffected but experience increased traffic because other online communications are unavailable. These mobile broadband systems would become more critical as communications systems at failure, overloading or downtime in these mobile systems would significantly impact emergency worker ability to provide safe and efficient services, leading to the loss of human life.
- The activation of TDR at the discretion of Mobile Network Operator (MNO) and not government or emergency stakeholders is problematic.
- We feel there needs to be greater Government control and oversight for such a critically important initiative.

In response to the questions in the Issues Paper:

What can be done to maximise access to multiple connectivity options in case of outages?

What innovative solutions can be explored to ensure telecommunications infrastructure remains operational during and after natural disasters?

Mobile telecommunications are essential to regional business and communities. During emergencies, telecommunications provide vital communication channels for emergency services, first responders, and affected residents. It supports timely alerts, evacuation coordination, and dissemination of critical information to ensure public safety and effective emergency response.

Recent disruptions including the bushfires, the COVID-19 pandemic, and floods have highlighted the importance of mobile telecommunications for both survival and recovery in extreme situations, while highlighting the gap in service availability and quality between metropolitan and regional Australia.

We strongly support the introduction of mandatory roaming in emergency situations. Emergency mobile roaming can play a vital role in emergency communication by ensuring that individuals can use their phones to access help, receive alerts, and maintain contact with loved ones and authorities, regardless of their location or the circumstances they find themselves in.

Mobile communications are increasingly used to deliver a range of app-based government and commercial services and are increasingly used for app-based personal communication as well.

Emergency roaming deployed on a location basis in times of emergency would provide significant safety benefits to regional residents and visitors.

In many cases, individuals who are out of coverage of their mobile network operators (MNO) are within coverage of another MNO. Allowing individuals to roam to the strongest signal at any location would increase the depth and reliability of mobile communications in emergency situations.

Mobile roaming provides a solution for temporary network resilience during disasters and outages, allowing communication services to be maintained under adverse conditions.

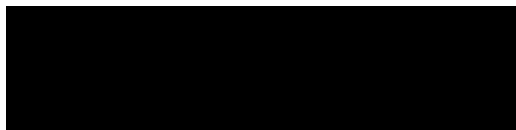
In the case of emergency personnel, these benefits are increased by the additional dangers they face in entering disaster areas. Emergency service personnel commonly use public mobile communications to complement specialised communications devices, so improving the extent and quality of coverage will also improve their awareness of emerging threats that can help them protect residents, visitors in the area, and themselves.

RDA Grampians remain committed to continuing our advocacy efforts to support temporary disaster roaming and seeing TDR become a reality before the next fire season.



I am happy to speak with you about any initiatives that increase telecommunications equality for all regional and rural Australians.

Your sincerely



Chair

