WAFarmers Submission:
Independent Regional Independent Telecommunications Review 2024

WAFarmers welcomes the opportunity to provide a submission to the 2024 Independent Regional Telecommunications Review 2024.

WAFarmers represents the broadacre farming community of grains and livestock producers across Western Australia.

Title

Enhancing Mobile Coverage Across Western Australia's Wheatbelt: A Call for Maximizing Existing Infrastructure and Forward-Looking Investments
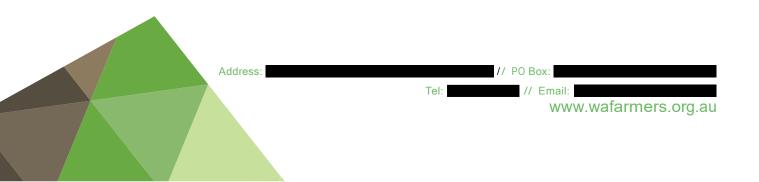
Introduction

The vast expanse of the Western Australian Wheatbelt represents a unique challenge to both government and telco providers. Covering an area of 18 million hectares, the 5,000 farm businesses and the 20,000 small and medium-sized businesses that support them need not just almost complete mobile coverage but also high-speed data. This need has become increasingly pressing since the introduction of smartphones in the early 2000s, along with the explosion of social media apps.

While mobile hardware has advanced and a new spectrum has been released as we've moved from 2G, 3G, 4G, to 5G, providers have struggled to keep up with the exponentially growing demand and rising expectations. Call it the "Freeway to the Farm Gate" syndrome. Once we got a taste of gravel roads, then bitumen, then dual lanes, and now freeways, expectations have risen as to how close that 'freeway'—with its emphasis on free movement, not traffic jams—can come to our farm gate.

How much this failure is due to government and telcos mismanaging expectations is a discussion for another time, but what is clear is this: when services are made available (i.e., coverage along a road or across a farm) and then lost, people rightly get angry. People will accept a lack of services if they live regionally or remotely, but they won't accept services being given—funded by users and taxpayers—then taken away, while services for city dwellers keep improving.

This is the core issue the Regional Communications Review must address.

While it's valuable to hear from farmers on where their phones no longer work, this won't get us closer to economically feasible solutions for both government and providers. Nor will it address what's technologically viable.

So, what's required?

1. **Clarity from the Government** on future funding for black spots. Without a cap, the wish list has no bounds.

2. **Separate funding buckets** for remote and Indigenous communities versus regional towns and farming communities. These groups have different needs, and funding should reflect that.

3. **Understanding the limitation of Competition:** Sometimes competition limits connectivity

4. **Encouraging public-private partnerships** between state governments, local governments, telcos, and private customers to provide affordable, practical solutions.

All of this must be framed within the reality that mobile coverage has evolved—and will continue to evolve—as we phase out older systems like 3G. This submission advocates for the Federal Government to ensure that current mobile infrastructure is optimized, with future decisions about spectrum allocation and network developments in mind.

It will also argue for a comprehensive mapping exercise to identify gaps in coverage and explore the balance between competition and coverage.

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1. The Current State of Mobile Coverage and the Impact of the 3G Shutdown

A crucial part of improving mobile coverage across the Wheatbelt will be conducting a comprehensive mapping exercise. This should identify exactly where coverage gaps exist and why these gaps persist despite recent technological advances.

Historically, coverage maps provided by telcos have been overly optimistic, often showing areas as covered by mobile networks when, in reality, coverage is intermittent or unreliable. Ground-truthing these maps—by collecting real-world data from farmers, local communities, and businesses—is essential to understanding where coverage is truly lacking. Once these gaps are identified, the Federal Government, in collaboration with telecommunications providers, can prioritize the building of new mobile towers in the most underserved areas.

This mapping exercise should also identify where existing towers can be upgraded or reconfigured to provide better service, particularly in areas where 3G once provided coverage that 4G or 5G networks have yet to fully replace. By understanding the true state of mobile coverage, decision-makers can ensure that investments in new infrastructure are targeted and effective.

The mapping exercise should be conducted over a peak farming season, like harvest or seeding, to ensure it reflects the peak demands of farming operations.

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2. Addressing Growing Data Usage: A Key Challenge

With more people relying on mobile devices for everyday activities—such as streaming videos and using social media—the demand for mobile data has skyrocketed.

This increase in data usage places significant strain on existing mobile infrastructure, especially in rural areas where towers are fewer and farther apart. As new technologies roll out, there is an opportunity to address this problem by maximizing spectrum availability on existing towers. The Government's decision to auction off 20-year licenses for low-band mobile services last year was a step in the right direction.

Low-band spectrum is crucial for rural areas as it allows mobile data to travel longer distances, covering vast areas. However, as the ACCC has pointed out, a limit on how much spectrum each company can bid for could hinder the expansion of mobile services in rural Australia. Additionally, if too much competition is introduced, it could discourage further investment.

Governments manage private monopolies all the time—whether airports, ports, or pipelines—but there seems to be reluctance to explore the use of monopolies to address market failure in mobile coverage for rural areas. Independent economic research is needed to examine the mobile monopoly vs competition question and inform government policy development. At the very least, market-based experiments to auction monopoly rights should be explored.

New and innovative ways are needed to incentivize private providers to invest more in rural infrastructure.
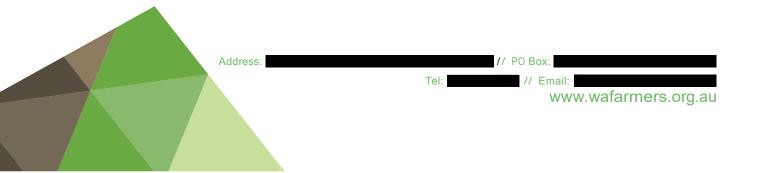
3. Addressing Technical Literacy and Spectrum Management

One of the challenges is the highly technical nature of spectrum management. Spectrum is a valuable resource, but the community has little understanding of its capacity and how it can be utilized.

The Federal Government needs to be more transparent about spectrum availability, its capabilities, and the compromises made when it is auctioned. Without this information, it's difficult for the community to manage expectations.

4. Public-Private Partnerships: A Way Forward

Public-private partnerships (PPPs) between telcos, farmers, and mining companies may be one of the most effective ways to improve mobile coverage in the Wheatbelt. These partnerships could facilitate the construction of new mobile towers in underserved areas, with farmers and miners contributing land or resources in exchange for better coverage.

Farmers have been vocal about their desire for improved mobile coverage, often prioritizing voice calls over data services. However, as agricultural technologies become more data-intensive, the demand for reliable mobile data will continue to grow.

By giving country shires federal and state funding for roads, they are able to make informed local decisions around the cost-benefit of upgrades. Similarly, if the 44 shires across the Wheatbelt could share $44 million over four years, it could yield significant improvements in local connectivity through PPP outcomes.

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5. The Role of Satellite Technologies like Starlink

While mobile towers will continue to play a central role in providing coverage across the Wheatbelt, new technologies like Starlink offer an alternative solution for remote areas. Low-flying satellite systems like Starlink can provide reliable internet and mobile coverage in areas that are difficult or expensive to reach with traditional infrastructure.

However, satellite services like Starlink should be seen as a complement to—not a replacement for—traditional mobile infrastructure. While they can provide internet access, they don't yet offer the same quality of voice call coverage as mobile towers.

Conclusion

The challenges of mobile coverage across the Wheatbelt are complex but not insurmountable. The government needs to be upfront about available funding and the service levels they are targeting to begin managing expectations.

Mobile monopolies aimed at providing complete coverage should be reviewed and trialed perfection in the bush is pointless without connections across the bush telegraph. Maximizing the potential of existing infrastructure, increasing spectrum availability, and conducting a comprehensive review of current coverage gaps will allow the community to negotiate with telcos for real-world solutions.

Public-private partnerships, along with new satellite technologies, offer innovative solutions for filling coverage gaps and meeting the growing demand for mobile data.

In its regional communications review, the Government must work smarter with funding, technology partners, and the people of the Wheatbelt to ensure they have the mobile coverage they need to thrive in a rapidly evolving digital economy.