



Our Ref: D-21-102333  
Your Ref:  
File Ref: GR/11/0056-011  
Enquiries: Phil Melling

29 September 2021

2021 Regional Telecommunications Review Secretariat  
Department of Infrastructure, Transport, Regional  
Development and Communications  
GPO Box 594  
Canberra ACT 2601

Email: [secretariat@rtirc.gov.au](mailto:secretariat@rtirc.gov.au)

Dear Sir/Madam

**REGIONAL TELECOMMUNICATIONS REVIEW 2021 – CITY OF GREATER  
GERALDTON SUBMISSION**

Thank you for the opportunity to provide a submission to the Regional Telecommunications Review 2021.

Given below is the City's submission framed around the questions asked within the Issues Paper:

***Q1a. What telecommunications services are required in regional Australia to meet current and future needs?***

The City of Greater Geraldton is a local government area in the federal electorate of Durack, 415 kilometres (258 miles) north of the state capital, Perth on the Indian Ocean. It covers an area of 12,625.5 square kilometres (4,874.7 sq. mi) and includes the communities of Geraldton, Mullewa, Walkaway and Greenough. It is home to 38,231 people, Greater Geraldton supports **16,653 jobs** and has an annual economic output of **\$7.154 billion**.

A reliable and wide coverage 4G/5G network that allows Regional Australia the same access to internet and mobile networks as the city enjoys.

***Q1b. Are there any things regional communities and businesses need to do, but can't, on their existing services?***

Within the regional areas of the City of Greater Geraldton there are many things the community cannot do because it does not have a reliable telecommunications system that covers the entire area. Basic activities such as making a phone call or doing homework with children can prove difficult because of the lack of service. This is extremely limiting to the Agriculture and Mining sectors.





With increasing use of technology especially in broad scale farming areas the use of good quality telecommunications is an essential ingredient to the continued success of agricultural commodities in Australia's economic longevity. Farmers have a broad range of tools available to assist in their business that ensures productivity can be maximized. Modern farming equipment is delivered with various levels of instrumentation to maximise the machines functionality. Poor mobile communications significantly impede the use of all of this technology, unfortunately satellite technology does not meet this need and the mobile network is the primary communications tool.

***Q2. What changes in demand, barriers or challenges need to be addressed when it comes to telecommunications services in regional, rural and remote Australia?***

The government needs to select one system (towers) and stay with it. The variety of systems that are available, none of which work well is a barrier.

Mobile phone tower installation is driven by higher more intense population levels yet data on an industry wide scale is essential to modern farming practices. The use of that technology does have its peak demand periods that accord with the seasonal nature of the farming industry.

The use of mobile phone technology is not limited to the agricultural industry and here in the Midwest its use is maximized in the transport industry (rail & road) and most importantly emergency services responding to incidents, bushfires and natural disasters.

In an emergency situation such as bushfires/ vehicle accidents etc. mobile communication becomes critical and is a matter of life or death for those involved especially if those impacted are not from the area so are unaware of communication limitations.

Primary producers and their employees are also often working remotely at night with limited or no communications and this can have serious repercussions if an accident occurs.

***Q3. How have the Government's policies and programs affected telecommunications service outcomes in regional, rural and remote Australia? How can these be improved?***

The City is grateful for the Federal and State Government's funding of the telecommunication Blackspot program. However there have been a number of practical issues with the program at the grass roots level that have compromised performance. Some of these issues are as follows:

1. The coverage plans do not reflect what is actually happening on the ground. The coverage plan means there are areas that cannot get a tower because the plan says they have coverage when they do not.
2. The Governments give money to the successful carrier who in turn provides the tower. The carrier however, through cost cutting, does not put the tower in the best location. They put it in the cheapest location – adjacent to electricity for instance. This means towers are being installed that are not helping solve the issue.
3. Different carriers win different rounds of the program. The result is that rural people have to have more than one phone to use the available service depending on where they are.
4. The towers are installed with very limited power backup systems. This means that when the power goes out (which is a regular occurrence), the telecommunications network also goes out.



5. The grant application process is very bureaucratic and complicated and surely can be streamlined.

Surely it would be possible to have more than one carrier on each tower?

***Q4. How do service reliability issues impact on regional communities and businesses? How do outages, including in natural disasters, impact on communities and businesses?***

Cyclone Seroja recently cut a swath of destruction through the Mid West. Rural areas subsequently lost electricity supply and shortly after; lost their telecommunications systems. These two systems were down for literally months! This is a very dangerous situation in rural and remote areas. There is also a significant psycho-social impact from the loss of telecommunications as it fragments families through the inability to communicate.

Telstra have also advised the City that the use of illegal booster equipment may result in a degradation of service on specific towers. Various media campaigns have been run to get users to cease their use. However, this ignores the fact that the boosters have been purchased because of deficiencies in the signal/ data availability from specific towers with the Service Provider taking no action to address user issues.

***Q5. How might such impacts be addressed to ensure greater reliability? How can the network resilience be addressed in regional areas?***

The easiest solution to these problems is to allow more than one carrier to have access to the existing towers and to provide these towers with a more resilient back up power systems. The backup systems need to be able to work for at least 24 hours. Even if 'key' towers were provided with more resilient backup systems, it would be a great start.

Given the reliance on the electricity network, the City is aware that in some areas within its boundaries the mobile phone towers suffer from multiple outages (especially during summer months) that can last for 24 hours or more. Sometimes alternate stand-alone back up power solutions are provided e.g. solar PV. These alternative solutions should be provided as standard where there are ongoing power reliability issues. The City is aware that Western Power are also looking at de-energizing some lines and putting properties on to stand alone solutions and this could impact on some mobile communications towers in the future. A suggestion from community members that is supported by the city is to consider co-locating these stand along power systems so that the system could power the farm dwelling and the tower. Alternatively, the Telecommunications provider and Western Power could work cooperatively to provide a stand along back up power system for the 'core' towers.

In the case of TC Seroja, mobile phone carriers had to truck in dozens of backup stand-alone generators to get supply back on to towers, some towers could not operate at full strength for an extended period (some are still having coverage issues nearly six months later). The issue then arose that the generators started to run out of fuel and it took some time for the carriers to organize refueling.

***Q6. How did the use of digital services change for regional consumers and businesses during the response to the COVID-19 pandemic? What insights for future service delivery does this provide?***

The push by governments for less face to face customer service and more on-line customer service may be good for the government, but is not good for the rural communities that do not have access to reliable telecommunication networks. It is unfair to push families and businesses towards on-line customer service but not provide an adequate system. If the government wishes to continue in this direction it must invest in regional telecommunications.



**Q7. What can be done to improve the access and affordability of telecommunications services in regional, rural and remote Indigenous communities?**

In a similar fashion to the provision of all utilities, it is the responsibility of the government to structure its utility costs to allow connection to disadvantaged and low socio economic areas. Governments are quick to point out the costs associated with the provision of utilities to rural areas, but not as quick to point out the revenue generated by these areas.

It is unfair to push families and businesses towards on-line customer service but not provide an adequate system. If the government wishes to continue in this direction it must invest in regional telecommunications.

**Q8. How can investment in telecommunications infrastructure work with other programs and policies to encourage economic development in regional Australia?**

The provision of telecommunications infrastructure needs to work in closely with the provision for electricity infrastructure. As the many Australian disasters illustrate, the loss of power means the loss of telecommunications. Mining Royalties should be used to fund these networks.

**Q9. What role could innovation, including new models, alternative investors or new ways of doing business, play to encourage investment in regional telecommunications infrastructure? What are the barriers?**

As suggested earlier, there must be a way to allow different carriers to share towers. Should the government own the tower and rent access to the providers?

Shared infrastructure opportunities would reduce costs and increase opportunity.

**Q10. To what extent will new technologies enable significant change to the delivery of telecommunications services in regional Australia over the next 5-10 years? Are there any barriers to accessing these technologies?**

The rural areas are concerned that the 3G network will be turned off without an adequate 4G network being provided. Our understanding is that 5G has coverage issues in the rural setting.

**Q11. How can Government better support the rapid rollout of and investment in new telecommunications solutions in regional areas?**

- Increase blackspot funding
- Review accuracy of existing coverage maps.
- More science around optimal site locations, taking into account topographical issues.
- Share infrastructure with the likes of ARC Infrastructure and their communication towers often located in black spot areas.

**Q12. How can different levels of Government, the telecommunications industry and regional communities better co-ordinate their efforts to improve telecommunications in regional Australia?**

When decisions are being made centrally, in Canberra some 4,000km away from where the towers are to be installed, it is very difficult to coordinate efforts.

Local Communities and Local Governments prepare submissions that go to the Development Commission and then to the State Government and then to the Federal Government. We



then get told several months later as to whether or not we were successful for reasons unknown.

Local Governments and local communities are not experts in telecommunication technology. We are able to advise what the issues are, but need access to the experts to advise what the solutions are.

Coordination of activities and better communication with key stakeholders, one size fits all model does not work regionally due to localised variations.

**Q13. What changes to Government investment programs are required to ensure they continue to be effective in delivering improved telecommunications?**

- Allow shared use of towers. If this is not possible, then consistently award all of the towers in a geographical area to one carrier.
- Ensure the successful carrier puts a priority on putting the tower in the best location to maximise coverage rather than to minimize installation costs.
- Insist on robust and reliable back up power systems be installed with new towers.
- A need to redefine how "Blackspot" areas are determined, for example Telstra may have a continuous network of towers along a major road for a significant distance (with some towers even installed via the "Blackspot" program), then there is a critical gap in Telstra coverage which does not meet "Blackspot" criteria as there is already a rival operators tower in place. This effectively means that users of that highway/ local residents/ farmers then need two different carriers' devices to bridge the gap.

**Q14. How can regional consumers be better supported to identify, choose and use the best connectivity options for their circumstances, as well as to understand and use their consumer rights?**

This is a significant issue as farmers are forced to use various communication options due to poor coverage. Unfortunately the promises made do not live up to the hype and necessitate use of multiple platforms e.g. land line network connected to a local wireless solution, Skymuster, Mobile phone communications with the use of booster equipment (legal & illegal) or alternate Satellite providers. The use of these multiple services all come at a separate cost just to get some form of coverage. Trying to navigate and get the best solution is left to the individuals concerned with many providers having no "local" contacts that are able to give sound advice for a cost effective solution.

**Q15. To what extent is public information on connectivity options, including predictive coverage data and speeds, sufficient to help regional customers make informed decisions? What other information is needed?**

Current information is difficult to navigate and / or get solid data at a localised level (especially relevant in areas where topography influences coverage patterns). Customers also purchase a providers equipment and then find out that the services on offer do not live up to the predicted data speeds/ capacity and even voice calls are difficult. More reliable data needs to be made available to customers and resellers.

**Q16. What other matters should the Committee consider in its review and why are they important?**

In the Mid West it is literally impossible for the local community to get information from Telstra. There are no local representatives or local shop fronts that will deal with these larger issues. The Telstra building in Geraldton still has the 'Telstra Country Wide' slogan painted on it when this has not been in place for many years.



For instance; a truck crashed through a Telstra depot fence in Mullewa. It took Telstra over 2 years to repair the fence after receiving many letters from the local council.

For instance; dangerous Telstra pits (trip hazards) are everywhere both in urban and rural areas. Getting action to fix them is impossible. The damage then lets water into the pit and local customers then suffer poor or intermittent services often for an extended period of time.

There needs to be better reporting and response processes tied to service standards that must be achieved.

If you have any questions in regard to the responses given above, please contact Mr Phil Melling, Director Development and Community Services, at the City on (08) 9956 6654.

Yours sincerely

Phil Melling  
**DIRECTOR DEVELOPMENT AND COMMUNITY SERVICES**