

Mobile Coverage Programme Discussion Paper Submission Cover Sheet

Submission Information

This cover sheet should be attached to submissions made to the Department of Communications in relation to the Mobile Coverage Programme Discussion Paper.

Contact Details

Name of respondent:	██
Name of organisation:	Broken Hill City Council
Phone:	██████████
Email:	██
Website (if applicable):	
Date:	03/03/2014

Confidentiality and privacy

All submissions and comments, or parts thereof, will be treated as non-confidential information unless specifically requested, and acceptable reasons should accompany each request. Email disclaimers will not be considered sufficient confidentiality requests.

Respondents lodging a submission should be aware that submissions (excluding any information agreed to be treated as confidential information) will be made publicly available, including on the Department of Communications' website. Submissions and comments will be subject to freedom of information provisions. Despite a submission being identified as confidential or sensitive, submissions may be disclosed where authorised or required by law, or for the purpose of parliamentary processes.

Do you want all or parts of the submission to be treated as confidential? Yes No

If yes, identify below which parts of the submission are to be treated as confidential (and provide a reason):

If the submission contains personal information of any third party individual, indicate on this Submission Cover Sheet if that third party individual has not consented to the publication of his or her personal information:

Submission Instructions

Submissions are to be made by **5:00pm (AEST) Friday 28 February 2014**.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text-based formats via the email address mobilecoverage@communications.gov.au

Alternatively, submissions can be sent to the postal address below (to arrive by the due date):

The Manager
Mobile Coverage Programme
Department of Communications
GPO Box 2154
CANBERRA ACT 2615

All submissions lodged will be acknowledged by the Department of Communications by email (or by letter if no email is provided). Respondents lodging a submission who do not receive acknowledgement of their submission should contact the Department. Submissions which are not acknowledged by the Department as being received may not be considered. Respondents should be aware that emails greater than 10Mb may not be successfully delivered.



Broken Hill City Council

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Quote No L14/524 – 11/72
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Telephone / Personal Enquiries
Ask For [REDACTED]

Please address all communications to:
The General Manager,
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P.O.Box 448,
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The Manager
Mobile Coverage Programme
Department of Communications
GPO Box 2154
CANBERRA ACT 2615
Email: mobilecoverage@communications.gov.au

Mobile Coverage Programme

Broken Hill City Council, with the support of the Broken Hill Local Emergency Management Committee (LEMC), submits this discussion paper for consideration for the Mobile Coverage Programme. Council and the LEMC have ongoing concerns with the limited Mobile Phone Transmission Towers and subsequent Reception situated in Far West Regional New South Wales and surrounding areas of South Australia and Victoria.

The City of Broken Hill (area 179sq km) is the largest regional centre in the western half of New South Wales. It lies in the centre of the sparsely settled New South Wales Outback, close to the South Australian border and midway between the Queensland and Victorian borders. The closest large population centre is Mildura in Victoria, 300 kms in distance to the south of Broken Hill on the Murray River. The capital city is Adelaide, the capital of South Australia which is approximately 500kms to the southwest. Due to its location Broken Hill has strong cultural and historical connections with South Australia. The city area is surrounded by and is a regional service centre to the Unincorporated Area of NSW and adjoining shire and district communities within NSW, South Australia and Queensland. Due to the isolation of the area, the mobile phone network in particular experiences little or no coverage for most of its length outside of the main town centre which gives rise to obvious risks to the travelling public.

Council notes a specific example where efforts to locate travellers that were in distress were hampered by the scarcity of Mobile Phone Transmission Towers in the area. This meant that efforts to locate the travellers using triangulation techniques were ineffective. The three travellers were eventually located but unfortunately one of them did not survive the experience. This traveller might have survived if Emergency Services had been able to locate him sooner by triangulating his location from the mobile phone signal. Council note that there have been similar incidents where the location of persons in distress has been hampered by the scarcity of mobile phone transmission towers in the Far West Region of NSW.

Council makes specific reference to the following questions and points raised in the Mobile Coverage Programme Discussion Paper, offering the following comment:

\$80 MILLION MOBILE NETWORK EXPANSION PROJECT

1. Would an appropriate minimum quality standard be that base stations must provide high-speed 4G LTE mobile broadband data communication services and also high quality 3G mobile voice and broadband data services? If this is not an appropriate minimum quality standard, what is?

It is preferred that base stations provide 4G Services as this has recently become the replacement in many capital cities and regional centres for the previous 3G services which were rolled out approximately 10 years ago. As with any advance in technology, it is assumed that 4G provides a higher quality service than 3G, which can be evidenced with the fast service 4G provides.

2. What are the most appropriate indicators that could be used to specify the minimum quality standards that should apply to the mobile services being provided through the programme? For instance, should it be a minimum received service signal indication (RSSI) in decibel-milliwatts (dBm)? A similar approach was adopted recently in the UK where a comparable programme specified a minimum RSSI for 3G voice and basic data service of -85dBm on roads and -75dBm in community areas (outside premises).

The RSSI measured in dBm at least allows mobile users to see on their phone that they may have moved into an area where there is weaker signal. The phone will prompt them that only emergency calls can at least be made. When comparing roads and community areas, data would be considered less important on roads than it is in community areas. The quality of voice should be considered more important on roads than data. The quality of data services in community areas should be on par with voice services in community areas.

3. Does delivery option 2 for the \$80 million Mobile Network Expansion component raise any additional issues that need to be considered?

The delivery option that maximises coverage should be chosen. Wholesale agreements that facilitate transparent roaming between MNO's should be encouraged. If allowing bidders to incorporate the use of base stations owned by NBN Co as part of their bid maximises coverage, then this should be allowed [Q5]. If a joint bid between a specialist network provider and an MNO maximises coverage, then joint bids should be encouraged [Q6]. Option 3(b) would appear to allow consumers to roam transparently between MNO's and so would be desirable for Australia's regional market where there may be limited consumer demand but demand that nevertheless be met [Q8].

\$20 MILLION MOBILE BLACK SPOTS PROJECT

Under this program outlying communities such as Wilcannia, Tibooburra, White Cliffs, Silverton and Menindee would be able to put forward locations to be funded for upgrading. Council's including the Broken Hill City Council and the Central Western Darling Shire Council could submit an Expressions of Interest. An expectation that relevant Councils would commit to a co-contribution is not achievable at this stage as their current financial situation will almost certainly preclude any co-contribution.

The provision of mobile networks is not a core responsibility of Local Government and so should be provided by the private sector where there is sufficient commercial demand or higher tiers of Government if there is insufficient commercial demand. Typically, the impost of a co-contribution will fall on those Local Governments least able to afford them. If there must be a co-contribution by Local Government then it should be minimal and the provision of in-kind services should be allowed.

The mobile black spots project should not be dependent on the capacity of the relevant Local Government to make a contribution to the project.

OPEN ACCESS AND CO-LOCATION PROVISIONS

11. Should MNOs be required to pre-commit to/co-invest in the base stations for which they wish to share infrastructure?

Pre-commitment and co-investment from MNO's for base stations would be necessary to ensure that commitment is gained. Although this may attract private infrastructure companies, if no attraction is gained this could be of significant loss to the MNO's and this may limit the programme's success.

13. Should the proposed open access provisions be applicable to base stations funded under the \$20 million component, or should there be scope to exclude some base stations from these requirements?

The delivery option that maximises coverage should be chosen.

PROPOSED ASSESSMENT CRITERIA

15. Do the proposed assessment criteria achieve the right balance to deliver the best value for money outcomes?

The inclusion of "per premises" assessment in a number of the assessment criteria are biased towards larger populated centres and so will disadvantage the more remote and isolated communities such as Broken Hill and surrounding area.

Criteria 4 relating to co-contributions will disadvantage those remote local government areas who are already struggling to remain financially viable and so are in no position to offer any co-contribution.

In determining the value for money to the Commonwealth (criteria 5), the number of base stations will be assessed based on the per kilometres of national or state highway and arterial road measure included in Criteria 5 will disadvantage rural and remote areas serviced by smaller recognised service and unsealed roads. Criteria 7 will disadvantage remote regional areas that may be struggling to attract one MNO let alone multiple MNOs.

UTILISING THE NBN FIXED WIRELESS NETWORK

18. To what extent would the use of the NBN fixed wireless network result in improved mobile coverage outcomes in regional Australia?

It would seem logical that the rollout of the NBN fixed wireless network will create opportunities to improve mobile phone coverage outcomes in regional Australia and these opportunities should be taken wherever practicable without undue regard to vested interests of the NBN or MNOs.

Broken Hill already has NBN fibre installed on the outskirts of city awaiting termination and it is hoped that it can be utilised to improve mobile coverage in the area. The Mobile Coverage Programme may be a catalyst for this to occur.

There are many benefits to be gained from improving the mobile network including an increased capacity to respond to and recover from natural disasters and emergency events. Council considers that residents of rural and remote areas should have similar access to reliable mobile network services as enjoyed by residents of the more heavily populated areas of Australia.

Summary

Adequate and reliable mobile coverage has become an essential enabler to carrying out a business, achieving an education, accessing health services, travelling from one location to another and general everyday living. For this reason, the lack of coverage in remote regional areas has become a distinct disadvantage both commercially and socially.

Council and the LEMC welcome the Australian Government's \$100 million dollar commitment to improve mobile coverage. However, this is tempered by the realisation that the proposed funding will fall far short of what will be ultimately required to deliver adequate and reliable mobile coverage across Australia including remote regional areas.

If you have any questions, please do not hesitate to contact myself at Council's Infrastructure Department via [REDACTED]

Yours faithfully,



PAUL DELISIO
GROUP MANAGER INFRASTRUCTURE