

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: [REDACTED]

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Date: 28 February 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.

Contact:
Telephone No:
Email:



28 February 2014

The Manager
Mobile Coverage Programme
Department of Communications
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Dear Sir/ Madam

Federal Government's Mobile Coverage Program

Thank you for the opportunity to provide a submission to the Mobile Coverage Programme Discussion Paper.

East Gippsland Shire Council is part of the Gippsland Local Government Network which has been involved in the rollout of a Digital Engagement Strategy and for the past two years. East Gippsland did not feature in any of the original National Broadband Network roll out plans for Australia and therefore welcomes the governments approach to improve coverage in regional areas of Australia.

Due to the natural landscape of East Gippsland the mobile coverage is characterised by numerous black spots and overall mobile coverage is very poor in areas off of the Princes Highway. Businesses and families in rural areas have had to rely on mobile phones and expensive mobile broadband for communication due to the limitations of aged copper phone lines.

This poses a number of challenges for East Gippsland not least our ability to provide emergency management in times of natural disasters and emergency events. The lack of mobile coverage also has an adverse affect on our tourism industry with limited services available to visitors to the area. This ultimately impacts the regions ability to not only attract visitors but provide the services visitors demand when in the region. It is not only visitors who are impacted by the lack of mobile coverage but residents are also disadvantaged through increased isolation and at risk due to the lack of a suitable mobile network across the region. Businesses productivity is also impacted due to the inadequate mobile phone coverage in our region.

The proposed program to support improve mobile coverage along major transport routes, in small communities in areas that are prone to experience natural disaster and locations that experience overage problems during seasonal holiday periods would address a number of the challenges East Gippsland experiences due to our current lack of mobile coverage.

Proposed Assessment Criteria

We commend the introduction of the \$80 million Mobile Network Expansion Project and continuation of the Mobile Blackspots Project and offer the following comments:

- The assessment criteria should include a weighting for "areas that are prone to natural disaster". This criteria is included in the programme objectives for the \$80 million Mobile

Network Expansion Project. It therefore needs to be included as an assessment criteria for this program.

- “Areas that are prone to natural disaster” should also be included as an assessment criteria for the Mobile Black Spots Project.
- In the same vein and to maximise the community and strategic benefit of the proposed towers, pager transmitters and trunk radio for emergency services such as the Country Fire Authority, SES, Ambulance, Police, and other government agencies and authorities should also be an assessment criteria. Such a mixed use of these towers could make it more feasible for state and territory governments and others to contribute. There could be significant infrastructure and operational cost savings in remote locations via shared tower, electrical and backhaul provision.
- “Extent of coverage benefit” for Blackspot funding should also take into account tourist and transitory visitation especially in isolated and National Park areas such as Mitchell River, Croajingolong , Alpine, Snowy River, Gippsland Lakes Coastal Park/The Lakes National Park, Cape Conran Coastal Park where there are flood and fire risks and significant visitation to National Parks. East Gippsland has a population of 43,000 but attracts over 1.2 million visitors annually. Mallacoota for example population grows from 1,000 to approximately 8,000 during the November to February period. Bushfire warnings are increasingly reliant on *sms* messages to those mobiles in the fire proximity. In times of elevated risk, if there is poor or no mobile reception, this presents a danger to life. This risk mitigation benefit also applies to coastal communities that have a huge influx of visitors over summer.
- The proposed assessment criteria should be weighted and take into consideration, the current level of telephone service, safety considerations, the need for residents, visitors and travellers as well as net cost. As copper phone lines have deteriorated and internet speeds have increased, many rural residents rely on mobile phones as a quality alternative.
- We are concerned that the co-contribution requirement may discriminate against sites that may be needed from the perspective of isolation, natural disaster and tourism benefit but may be less profitable and therefore less likely to be funded by telcos.

Mobile Network Expansion Project

We believe that the use of a single network operator contracted to deliver the program would not provide the best outcome and would lead to a continuation of higher prices and lower level of service for regional areas serviced by a single Mobile Phone Network Operator (MNO). The introduction of NBN wireless has clearly demonstrated the benefits of a wholesale owner of the infrastructure and multiple retail competitors in the market.

4G and 3G are clearly a minimum standard to support voice and data capability. This will need to be adjusted going forward as technology evolves.

The order of merit principles and practices as defined in Option 2 are supported. Greater competition is to be encouraged. However, the proposed placing of control over the terms and conditions of use of a tower, in the hands of one or more MNOs creates a barrier to competition. Such conditions and terms should be defined in the funding agreement. Access at a reasonable price would need to be guaranteed to other MNOs.

From a planning, community impact and efficiency perspective shared towers clearly have many benefits. From an emergency communications perspective, multiple MNOs sharing a tower enables all mobile phone users to receive messages and to make calls, not just the customers of a single MNO.

Delivery Option 3, with the network infrastructure provider building, owning and operating a network of base stations is Council's preferred option.

Option 3b where a wholesale mobile network capability is delivered would provide the best result for those areas where it is available. While clearly the more expensive option from a capital cost perspective, this option offers the following benefits:

- Service to all mobile phone users.
- Usage cost to MNOs based on the usage of the network by their customers rather than a fixed proportional infrastructure cost as outlined in the open access provisions.
- Returns to the wholesale network operator based on the usage.
- Potential for the Commonwealth to share in those returns to reinvest in future mobile phone programme infrastructure.

Option 3a, with the provision and management of towers by a third party, could be a lower cost option but may not deliver universal service being subject to MNO willingness to install their own network equipment. Therefore:

- Safeguards would need to be put in place to ensure that MNOs are signed up to install their own network equipment and have agreed to provide service.
- If Option 3a is adopted, elements of Option 2, should be incorporated:
 - order of merit to rank the sites in order of need and benefit;
 - ensure buy in from the MNOs for each tower to ensure that a mobile phone service is delivered; and
 - it would be counterintuitive for Option 3a to be offered concurrently with Options 1 or 2 as major MNOs may well refuse to participate in Option 3 because they have their own competing bid under Option 1 or 2.

I am also including a summary of the known black spots in East Gippsland, which can largely be characterised by any road leading from the Princes Highway:

1. Anglers Rest
2. Benambra
3. Bendoc
4. Bemm River
5. Bete Belong
6. Bindi
7. Bonang
8. Buchan
9. Cape Conran
10. Combienbar
11. Glenn Valley
12. Lake Tyres
13. Lindenow
14. Marlo
15. Reedy Flat
16. Sarsfield
17. Wiseleigh
18. Wulgulmerang

Specific Black spots along the Princes Highway include:

Lakes Entrance to Orbost

1. Toorloo Arm,
2. Simpsons Creek

Orbost to Cann River

1. Bottom of Mt Raymond to Cabbage Tree Creek
2. Bellbird
3. McKenzie River to Bright Light Saddle
4. Bright Light Saddle to Tonghi
5. Cann River Weigh Bridge

Cann River to Genoa

1. Thurra River
2. Mt Drummer to Wingham River.
3. Wingham River to Genoa (patchy)

Genoa to New South Wales Border (patchy)

Genoa to Mallacoota

1. Reception from both the Genoa and Mallacoota ends, nothing in the middle.

Other areas;

Omeo Highway

1. Bruthen to Ensay (mostly no reception)
2. Ensay to Swifts Creek (patchy)
3. Swifts Creek to Omeo (patchy)
4. Bairnsdale to Bruthen, bottom of Sand hill to Dirty Hollow Creek

Manarina to Bemm River (poor to no service)

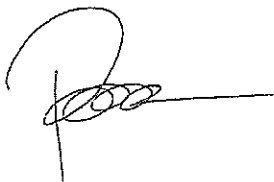
Monaro Highway

1. Good at Cann River and Bombala ends. No service on most of the rest of the road.

I trust the above comments are informative and provide the Committee with some understanding of the needs of East Gippsland Shire.

Please feel free to contact [REDACTED]

Yours faithfully



PAUL HOLTON
Director Development