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:	Lou Boyle
Name of organisation:	LGAQ
Phone:	██████████
Email:	██████████████
Website (if applicable):	https://lgaq.asn.au/
Date:	28th 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 x** ☐

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.

28 February 2014

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

Dear Sir/Madam

Mobile Coverage Programme Discussion Paper

The Local Government Association of Queensland (LGAQ) welcomes the opportunity to comment on the Commonwealth Government's $100 million Mobile Coverage Programme, which is designed to improve mobile coverage and competition in regional Australia.

Before addressing specific areas of the discussion paper, some general comments are required.

The Mobile Phone Industry – Global Position

The mobile phone industry in Australia is part of a global industry involving multi-nationals companies such as Vodafone and Singtel-Optus. A comparison, based on market capitalisation and subscribers of the three main companies that have a presence in Australia, demonstrates the size and the ability to invest in infrastructure.

Company	Market Capitalisation	Number of subscribers
Vodafone	$180 Billion	453,000,000
Singtel-Optus*	$215 Billion	434,000,000
Telstra	$64 Billion	15,000,000

*Singtel is owned by Temasek, which has a market capitalisation of $215B.

Hence, the view that the LGAQ has developed is that carriers like Vodafone and Singtel-Optus make investment decisions based on the best possible outcome on a global basis. Investment is usually based on strategic global marketing opportunity, which constrains their investment in the Australian mobile coverage market. Their investment in Australia is not because of being unable too, but rather recognising there are more strategic markets elsewhere in the world in which to invest.

Australian Position

It is no surprise then that all carriers have made considerable investment in metropolitan and provincial areas. Indeed all carriers admit to providing coverage to in excess of 95% of the Australian population.

The key advantage of robust competition in the metropolitan areas is national pricing. That is, each carrier provides pricing that does not discriminate where the user lives or uses the mobile device. The price that people pay for a service is Canberra or Sydney is the same for people who live in Charleville or Surat.

Given the nature of the local market, the LGAQ strongly believes that network extension should be considered as a priority before any duplication of existing network coverage. The LGAQ believes this would provide the best possible outcome for both the Commonwealth and for our communities.

Infrastructure Priority

The LGAQ would strongly advocate that towns that are the administrative centre of a local government council that do not currently have coverage should be the first priority of this Mobile Coverage Program. The foundation of this program is to address the issue of inadequate mobile phone coverage for rural and remote centres in Australia. The underlying objective should be a focus on identification of core network gaps in regional and remote centres and to ensure that these communities have the similar network capabilities to those in urban areas. The LGAQ has surveyed its members over the past four weeks in an attempt to ascertain a statewide perspective of mobile blackspots. A list of sites forms part of our submission (attachment 1).

Following this, attention should shift to improve coverage on National and State Highways and then other areas that are of strategic importance to communities. This generally aligns with the sentiment of the Department of Communications.

The nature of mobile phone infrastructure must be recognised – i.e. the base stations and repeaters that make mobile services possible. Mobile phone base stations are an access technology.

There are two telecommunications networks – the core network, which connects exchanges and provides the telecommunications backbone and the access network, which includes mobile phone base stations and broadband services such as ADSL, or IP services. The access network is dependent on the core network.

The absence of the core network results in a considerable higher capital expenditure and despite the good intentions of previous Commonwealth Government programs, sites without core infrastructure have been unable to secure funding for services such as mobile phone base stations because of the considerable costs in building both networks.

The problem in Queensland is the lack of core infrastructure in some rural and regional areas. Hence in Queensland there are high-profile sites that have no mobile phone coverage and despite previous attempts over a decade to have these areas funded, the reason frequently given was that they were too un-commercial because of the need for both core and access infrastructure.

The use of satellite as a backhaul solution for mobile phone base stations should not be considered. Satellite has limited scalability, and does not address the core problem of delivering long-term key telecommunications infrastructure to the community.

The LGAQ sees one of the roles of Government is to step in where it is not commercially viable for the private sector, and in this regard there is a need to ensure that all local government centres and in Queensland have access to a scalable and robust core telecommunications backbone.

The core optic fibre network in many areas of the State is usually located in highway corridors. There are exceptions, such as the Landsborough Highway between Winton and Cloncurry, where the lack of fibre has had the obvious impact of creating a 300-kilometre mobile phone black hole.

The lack of core infrastructure in Central Western Queensland (Diamantina and Barcoo Shires), and North West Queensland (such as the 300km gap between Winton and Cloncurry on the Landsborough Highway and towns such as Kynuna and McKinlay (in McKinlay Shire)) are areas where the need for the basic core platform is vital so that these areas can participate in the digital economy.

If it is not possible for the Commonwealth to fund these areas through the existing program, then consideration must be given to creating a specific fund to address the core infrastructure requirements of our regional population centres.

Skills and Awareness

As with all technology, people need to have the skills and awareness to obtain the optimum benefit. Mobile phones are no exception, and hence consumers need to have some awareness of the actions that they can undertake to improve the performance of personal mobile devices. As an example, this could include a public awareness campaign about the benefits of external aerials and car-kits.

This is particularly relevant for people who travel through rural and regional areas, but is also important in improving the performance of mobile devices in many other areas that are on the edge of network coverage.

There is also a role for mobile phone carriers to raise awareness about maximising the use of mobile phones through the use of external aerials. It would be pertinent to ensure that any communication program should be targeted to those identified mobile blackspot locales. Indeed part of the negotiation of this program with the Commonwealth should include an awareness campaign funded by the successful MNO/s.

Local and State Government Commitment to Investment

Historically, local government has been innovative in making investments that assist the roll-out of mobile phone base stations. This has taken the form of in-kind assistance, such as creating access roads to greenfield sites, assistance in developments and approvals, peppercorn rentals if located on a Council asset etc.

More recently, the Queensland State Government has also recognised the importance of improved mobile phone coverage throughout the State by allocating funds through the Royalties for Regions program. To date, two councils have been successful in their application which has resulted in approximately $5.65m being made available to assist in the funding of these projects. In both instances the funding covers only the partial cost of the total project cost.

Future Technologies

Finally, the LGAQ recognises that in May 2013 the Commonwealth successfully auctioned the 700 MHz spectrum, which will become available in January 2015. This lower frequency has the potential to have a profound impact on mobile phone coverage in regional Queensland.

The key benefit will be the signal which will be able to travel much further and therefore provide a greater network footprint, theoretically allowing the potential for more people, and additional coverage along National and State Highways.

The LGAQ supports the roll-out of new technology to improve telecommunications services.

Once again, I would like to thank the Department for the opportunity to provide input into the Mobile Coverage Program. If you require any further information please do not hesitate to contact Lou Boyle,

Kind regards

Greg Hoffman PSM
GENERAL MANAGER – ADVOCACY

ATTACHMENT 1

Mobile Phone Black Spot Areas - Queensland		
Town:	Population:	Council
Avondale		Bundaberg
Bucca		Bundaberg
Mona Mona	225	Tablelands/Cairns/FNQ
Koah	576	Tablelands/Cairns/FNQ
Speewah	802	Tablelands/Cairns/FNQ
Julatten	998	Tablelands/Cairns/FNQ
Arriga	702	Tablelands/Cairns/FNQ
Wondercla	580	Tablelands/Cairns/FNQ
Watsonville	344	Tablelands/Cairns/FNQ
Irvinebank	310	Tablelands/Cairns/FNQ
Topaz	467	Tablelands/Cairns/FNQ
Mutchilba	194	Tablelands/Cairns/FNQ
Dimbulah	1414	Tablelands/Cairns/FNQ
Chillagoe	192	Tablelands/Cairns/FNQ
Butchers Creek	285	Tablelands/Cairns/FNQ
Yungaburra	1116	Tablelands/Cairns/FNQ
Millaa Millaa	598	Tablelands/Cairns/FNQ
Herberton	934	Tablelands/Cairns/FNQ
Tarzali	590	Tablelands/Cairns/FNQ
Malanda	2,053	Tablelands/Cairns/FNQ
Ravenshoe	1,443	Tablelands/Cairns/FNQ
Mount Molloy	276	Tablelands/Cairns/FNQ
Innot Hot Springs	321	tablelands/Cairns/FNQ
Eromanga	50	Quilpie
Adavale	20	Quilpie
Clare	310	Burdekin
Millaroo	200	burdekin
Dalbeg	100	Burdekin
Coldwater - Abergowrie Valley		Burdekin
Burke and Wills	50	Burke Shire
Bedourie	120	Diamantina
Birdsville	120	Diamantina
Windorah	150	Barcoo
Jundah	70	Barcoo
Einsaleigh	60	Etheridge
Forsayth	50	Etheridge
Kin Kin		Sunshine Coast
Belli Park		Sunshine Coast
Obi Obi Valley		Sunshine Coast

Connondale		Sunshine Coast
Buepengary East		Sunshine Coast
Caboolture West		Sunshine Coast
D'agular		Sunshine Coast
Wamuran		Sunshine Coast
Beachmere.Ningi		Sunshine Coast
Stanthorpe - Severnlea		Southern Downs
Moonie		Western Downs
Springsure	128	Central Highlands
Rolleston	347	Central Highlands
Dingo		Central Highlands
Gympie - The Palms		Gympie
Gympie - Widgee		Gympie
Gympie - Kandanga		Gympie
Dalby - Quinalow		Western Downs
Moore (Kingaroy cluster)		North Burnett
Cape York	Laura	Cook
Cape york	Bamaga Injinoo	NPARC
Cape York	Bamaga - New Mapoon	NPARC
Cape York	Bamaga - Umagico	NPARC
Cape York	Bamaga Seisa	NPARC
Torres Strait	outer and inner islands	TSIRC
McKinlay		McKinlay
Kynuna		McKinlay
Flying Fish Point		Cassowary
Broadsound - Clark Creek		Isaac
Boyne Valley		Gladstone
HIGHWAYS		
Landsborough Highway	Winton to Cloncurry and towns Kynuna and McKinlay	McKinlay
Dawson Highway	Crescent Creek	Banana
Burnett Highway	Ban Ban Springs	
Gregory Development Road	Eumara Springs	
Gregory Development Road	Mount Jack	
Gregory Development Road	Greenvale	
Black Mountain Road	3km, mostly unsealed, access to both Kuranda and Mowbray	Tablelands
Warrill Drive/ Fallon Road	Major road to access Kennedy Highway	
1253 Rex Highway	12km north of Port Douglas, through Mossman, Julatten and Mt Molloy	
Palmerston Range	Starts in Innisfail, through rainforests to Milla Milla	
Kurranda Range	Starts in Smithfield, Cairns, takes you through to Kuranda, Mareeba, Tolga and Lake Tinaroo	
Gillies Range	16kms, approx 35 mins to travel, ascends the mountain ranges starting at Gordenvale	
Burketown - Normanton		Burke
Charleville - Quilpie Road		Quilpie
Quilpie - Windorah Road		Quilpie