

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:	██████████
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Date:	4 March 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.

Submission to the Mobile Coverage Programme Discussion Paper

From Mitchell Shire Council

Mitchell Shire Council welcomes the opportunity to make this submission to the Mobile Coverage Programme Discussion Paper. Council agrees that inadequate mobile phone coverage remains a significant issue for Australians living, working and travelling in regional areas of the country.

Council believes that there is an urgent need to improve mobile phone services in locations with unique mobile coverage problems – particularly in municipalities that are subject to frequent natural disasters such as Mitchell Shire

The *\$20 million Mobile Black Spots Project* focusses on communities that experience increased population during peak seasonal periods – this however has the potential of redirecting limited funding from municipalities that need reliable mobile communications coverage throughout the year and not just at holiday times.

Reliable access to phone coverage is taken for granted in metropolitan Melbourne, but in a region such as Mitchell Shire – the southern part of which lies within Melbourne’s designated growth boundary – the community also needs reliable phone coverage – particularly as many of our communities are located in high bushfire and flood risk areas. Quality mobile phone coverage may well save lives and is crucial when emergency services are increasingly promoting the use of websites and mobile telephone applications for the timely transmission of vital emergency information.

While it is acknowledged that the Discussion Paper addresses the issues related to natural disasters in the *\$80 Million Mobile Network Expansion Project* it does not consider investment in emergency-related infrastructure and encouraging the co-location of base stations on existing facilities as a means of contributing to the desired reduction in mobile black spots. In its recent review of Domestic Transmission Capacity the ACCC suggests that regulation is necessary to encourage the efficient use of infrastructure in areas of low market competition – typically regional and rural areas.

In relation to the impact on emergency infrastructure a case in point is the difficulties experienced in the operation of the Mitchell Municipal Emergency Coordination Centre (MECC) during two recent fire emergencies (Black Saturday 2009 and the Mickleham/Kilmore Fire 2014).

One of the major frustrations in operating the MECC during both emergencies was the quality of both the phone and wireless broadband coverage due to the low capacity of the existing infrastructure. There were numerous cut outs, downtime and significant delays caused as a result of the poor quality of mobile phone and wireless broadband coverage. This resulted in delays in receiving vital information, situation reports, tasking and requests for assistance. These issues diminished the operational effectiveness of the MECC.

Of equal importance is the fact that these fires encompassed parts of this Shire - including the townships of Reedy Creek, Whiteheads Creek, Kilmore, Kilmore East and Wallan – which have significant telecommunications black spots, meaning that patchy network coverage is clearly putting our communities at risk.

The above statements of the inadequacy of the existing mobile telecommunications network within Mitchell Shire are supported by extracts from the two following reports:

Report A

EMERGENCY MANAGEMENT PREPAREDNESS REVIEW

Extract from Report by Mitchell Shire Council Municipal Emergency Resource Officer

Local risk priorities include:

Emergency Situation Floods

Seymour has a record of floods within the town, the most recent being January 2011. The thin sandy soils in the headwaters of the major river tributaries have a limited capacity to retain water, and after heavy rain, sheet flows and downstream flooding has occurred in streams such as Whiteheads Creek, Dabyminga Creek, Sunday Creek, Dry Creek, Major's Creek and Hughes Creek.

Emergency Situation Fires

Significant fires in the rural nature of the area, and State forests are of a serious nature, the most recent fires being 'Black Saturday' February 2009 which devastated areas Kilmore and Kilmore East, Wandong and other areas throughout Central and Southern Victoria. (More recently the Mickleham/Kilmore fire of February 2014 created similar devastation).

The MERO's report underpins the importance of an effective and reliable communications network in responding to emergencies in today's environment where the incidence of fire and flood is likely to increase as a result of climate change and cannot be ignored.

Report B

Bushfire Royal Commission Final Report

Kilmore East Fire – Section 5.2 Communications

Making contact with the Kilmore Incident Control Centre was a constant problem. Of 530 incoming calls between 13:00 on 7 February and 12:00 on 8 February, 339 (or 64 per cent) were not connected for various reasons, including a busy signal, or were simply not answered.

The liaison officer appointed to the Mitchell MECC could not contact the Incident Controller and could not retrieve up-to-date information from the CFA intranet. Police liaison officers at the Kilmore ICC were unable to resolve the problem.

Section 8.3 During and After the Fires

There were, however, situations where poor communication between personnel in the ICC and the MECC created difficulties for the MECC and police in terms of resource management and community information—for example, the Kilmore East fires.

Fire Ground Response – Section 3.2.4 Use of technology on 7 February

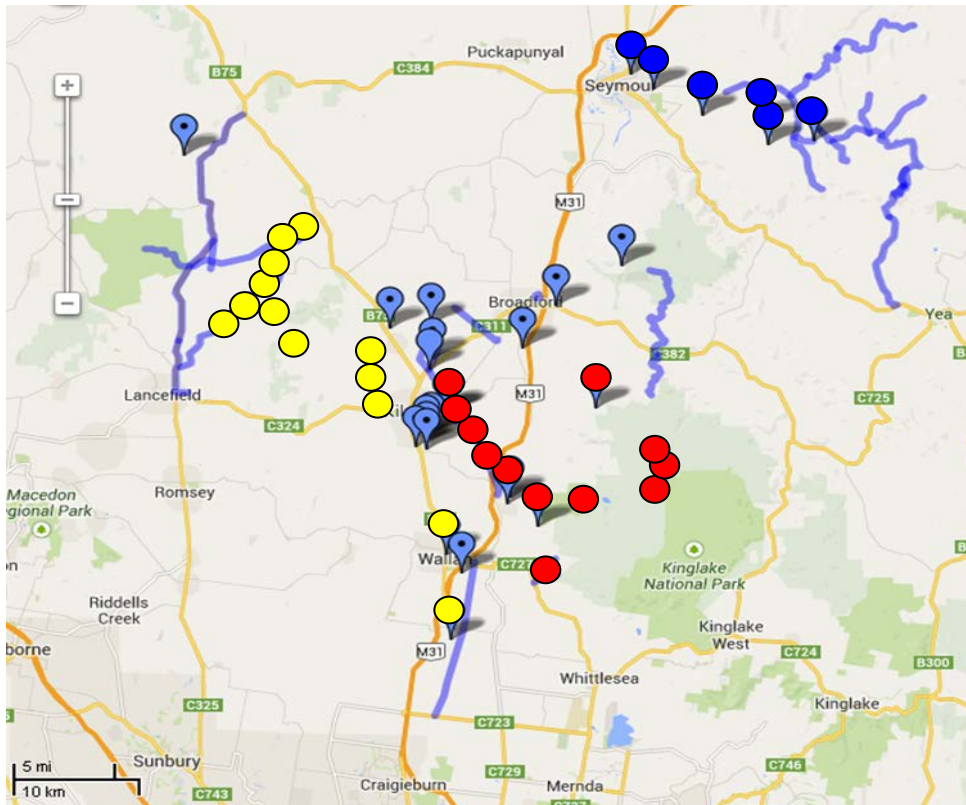
On 7 February there were various problems with fire management technology at incident control centres. The CFA and DSE used different systems to do similar tasks. Access to the systems for all incident management team staff was not always possible. This made the use and transfer of information, such as warnings, maps, and situation reports, difficult. A detailed CFA investigation into communications and technology in 2008–09 was completed by independent consultants Mingara Services. It revealed the following about 7 February:


- *The networks were too slow to run the applications required (like mapping) and were not coordinated between agencies. A lack of shared drives across the CFA and DSE for Incident Controllers and bottlenecks caused slow access.*
- *CFA personnel did not have access to the internet (on their Telstra Next G™ cards) and were unable to access many relevant websites.*

Mitchell Shire Council Black Spot Survey

Mitchell Shire Council recently called for residents throughout the municipality to register black spots where mobile phone coverage is weak or non-existent. As part of Council's ongoing advocacy program, Council is in discussion with mobile service providers regarding the need to improve the quality of phone coverage across the municipality.

The project recorded the exact location of the black spot on an interactive map on Council's website in order to identify areas of deficiency that exist within the municipality – it is particularly significant that many of the identified areas fall within defined bushfire and/or flood prone areas and these have been identified on the map below.



-  Seymour Floods 2011
-  Kilmore East/Murrindindi Fire 2009
-  Mickleham/Kilmore Fire 2014

Council Services

Council relies extensively on the local mobile telecommunications network to deliver a wide range of essential services to the community and these are summarised in the table below.

Unit	Use and known issues
Engineering and Infrastructure	In Field data capture; fire hazard inspections; emergency and regular road works
Local Laws	Community safety; animal control - many of which are remote and suffer from 3G signal loss.
Building	Building inspections. This unit has specific issues in Reedy Creek (all) Strath Creek east of English road; Hume highway northbound near Wandong turn off; Tyaak; some areas of Pyalong; Pyalong- Seymour Road; Burke and Wills Track; Mia Mia and Glenhope
Waste Management	Transfer Stations at Broadford, Seymour and Wallan and Pyalong all rely on mobile coverage for electronic transactions and the Transfer Stations at Broadford, Pyalong and Seymour also rely on mobile coverage for communication with supervisors and for working alone procedures.
Parks and Environment	Contact with works teams servicing parks, reserves and street scapes in Beveridge, Wandong , Broadford, Kilmore, Tallarook and Pyalong.

Summary

Council is concerned that inadequate mobile phone coverage remains a significant issue for Australians living, working and travelling in regional areas of the country and considers that there is an urgent need to improve mobile phone services in locations with unique mobile coverage problems.

Council submits that:

- Both project streams outlined in the discussion paper should be broadened to identify areas where poor mobile phone coverage is compromising public safety (particularly during times of emergency such as bushfires and floods).
- Greater emphasis should be given to the mobile phone requirements of communities that have a more stable population (as opposed to holiday destinations) and a year-round need for improved coverage.
- The consultation should explicitly recognise the impact on the community of cost shifting of infrastructure construction and apply a differential between commercial benefit to the major telecommunications providers and public safety need.
- The Federal Government is encouraged to confirm its intention to make National Broadband Network towers available to mobile operators as this should help make the most efficient use of backhaul options and infrastructure.