

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]
Name of organisation:	Moyhu Action Group
Phone:	[REDACTED]
Email:	[REDACTED]
Website (if applicable):	
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? 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 mobi1ecoverage@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.

MOYHU ACTION GROUP

Submission to the Mobile Coverage Programme for utilizing the NBN Fixed Wireless Network for Improved Mobile Coverage

1. LOCATION -

Moyhu is a small township 25km south of Wangaratta in NE Victoria and is included in the initial phase of a works program to bring the NBN to the North East of Victoria at a cost of over \$2m. Moyhu's tower will be on the Meadowcreek Road, and it is expected that it will be operational from mid 2015.

An application for a planning permit has already been lodged with the Rural City of Wangaratta.

2. POTENTIAL USERS -

The township is considered to be the "Gateway to the King Valley, a wine growing and gourmet food area, which is growing in prominence with tourists.

The district also has influxes of itinerant workers at various times of the year eg: Autumn, Winter & late Spring, who are highly dependant on mobile phones for communication, and because of the amount of forest on the hillsides, the district is also prone to bushfires.

3. PRESENT INFRASTRUCTURE & COVERAGE –

TELSTRA - A Telstra mobile tower located at King Valley midway along the Valley provides service to the mid and upper reaches of the valley, however as it is located on the valley floor and the presence of hills at Edi, it does not provide reasonable reception to the lower reaches of the valley, the Moyhu district, or outside the valley.

OPTUS - Optus towers at Edi and Whitlands provide a better cover for the King Valley and the adjacent Boggy Creek Valley (Myrree).

VODAFONE - Vodafone doesn't have a presence in the district at present.

4. BLACK SPOT –

Moyhu has been registered on the Federal Government's Mobile Coverage Programme data base as a black spot for mobile phone communication.

5. UTILISING THE NBN FIXED WIRELESS NETWORK –

The Moyhu Action Group fully supports this option as being the best solution to improving mobile phone coverage in our district and most likely in many other rural and remote areas.

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

As mentioned in the Discussion Paper - *"There are locations where NBN Co is building new base stations for the delivery of fixed wireless services where there will be limited (or in some cases no) mobile coverage"* – In our case, and probably for many of the NBN towers in the Wangaratta district, the structures are in rural areas and away from major roads and towns and therefore there would be limited coverage. The opportunity to co-locate mobile equipment on these NBN facilities would solve a major problem for these areas. Encouraging M.N.O.'s to co-locate their equipment would lower the cost of providing mobile coverage in these areas.

Question 19 -How best can a greater role for NBN Co improve competition and choice for consumers in regional Australia?

As mentioned in item (3) above, the district only has reasonably reliable coverage from one provider at present and the rollout of the (NBN) fixed wireless network provides an opportunity to improve mobile phone coverage and competition in the district by allowing all three NMO's to locate their infrastructure on the one tower at considerable saving in set up costs to each.

(2)

As mentioned in the discussion paper, if one NMO already has good coverage in the district there would still be benefit by making it easier for a second or third MNO to use NBN Co's base stations to offer mobile coverage in the area. This would deliver increased mobile competition even though it would not increase the total area where mobile coverage was available.

Question 22 - How can the Mobile Coverage Programme best complement any role that the NBN fixed wireless service plays in improving mobile coverage and competition?

As mentioned in the discussion paper the NBN Co could play a more active role in encouraging MNO's to work collaboratively to take advantage of these locations and as the NBN Co is already working with MNO's and mobile infrastructure providers to allow shared and 'build-to-suit' options on a limited basis it may be able to play a more active role in aligning common opportunities. If MNO's were engaged early in the process, there may be opportunities to negotiate mutually suitable locations and to incorporate their technical requirements in the design process. Designing and building future NBN fixed wireless services to take advantage of the potential synergies with mobile services could mean the significant investment in the NBN telecommunications infrastructure is used more efficiently and effectively.

February 2014.