

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

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Date:	3 rd April 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 mobilecoverage@communications.gov.au

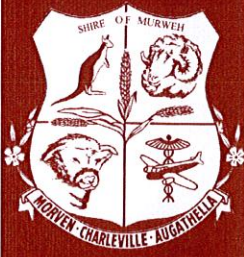
Alternatively, submissions can be sent to the postal address below (to arrive by the due date):

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.

MURWEH SHIRE COUNCIL

95-101 Alfred Street, Charleville
A.B.N. 98 117 909 303



24 February, 2014

YOUR REF:

IN REPLY CONTACT:

RESPONDS TO: JJK

OUR REF:

Hub of the South West

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

Via email to: mobilecoverage@communications.gov.au

Dear Sir/Madam

Mobile Coverage Programme - Submission

Thank you for giving us the opportunity to participate in the Federal Government's call for information on the Mobile Coverage Program for the Shire of Murweh and accordingly we attach our response to the set Questions.

Independent research commissioned by Council has identified that:-

- Two out of our Five communities have no mobile coverage whatsoever
- The remaining three are intermittently covered by two carriers (Optus & Telstra)

While this information was compiled from existing information supplied by Mobile carriers, it is expected that a full survey of on-site signal strengths will reveal many more blackspots than are actually recorded at the moment.

Murweh Shire Council administers an area of 43,000 sq. kms and is classified a rural and remote part of Queensland.

ADDRESS ALL
COMMUNICATIONS
TO:
THE CHIEF
EXECUTIVE
OFFICER

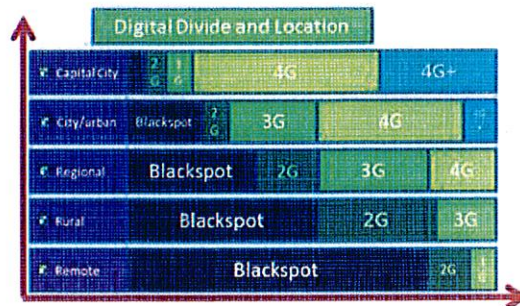
MURWEH
SHIRE
COUNCIL

P.O. BOX 63
CHARLEVILLE
4470

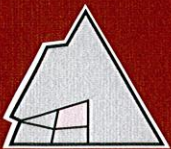
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(07) 4656 8399

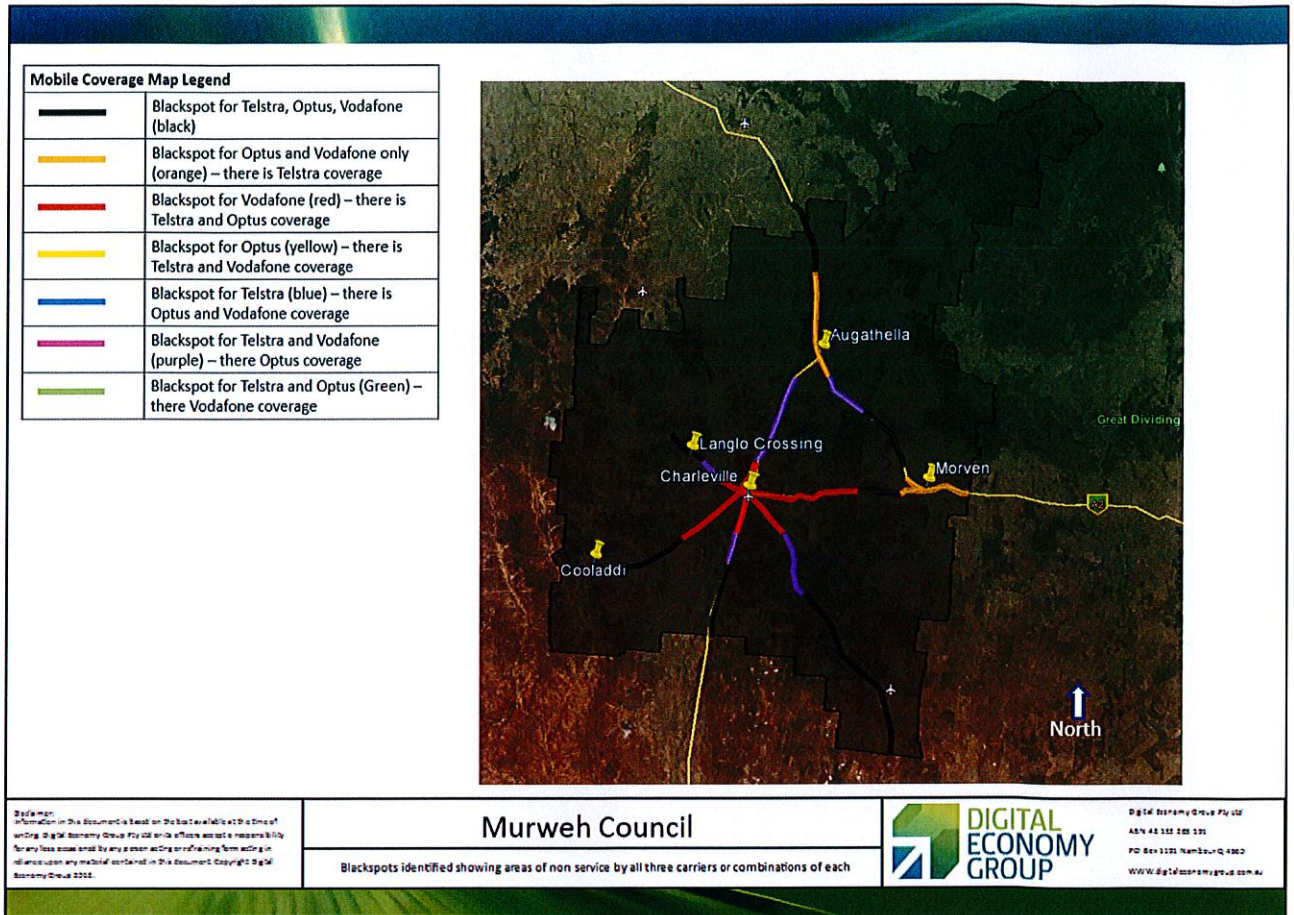
TELEPHONE
SHIRE OFFICE
(07) 4656 8355

E-MAIL
ceo@murweh.qld.gov.au



Digital Economy Group 2013





The priority locations for Murweh Council are:

Priority	Location	Investment required
1	Cooladdi	3 Carrier Blackspot – Mobile Phone and Broadband Coverage
1	Langlo Crossing	3 Carrier Blackspot – Mobile Phone and Broadband Coverage
2	Augathella	Optus & Vodafone Blackspot – Mobile Phone and Broadband Coverage. Telstra network upgrades
2	Morven	Optus & Vodafone Blackspot – Mobile Phone and Broadband Coverage. Telstra network upgrades
3	Charleville	Vodafone Blackspot – Mobile Phone and Broadband Coverage. Telstra and Optus network upgrades

We remain at your disposal for any further information you may require



Yours faithfully

John Nicholson
John Nicholson



ECONOMIC DEVELOPMENT

Attachment 1- Responses to discussion paper and associated questions




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?













-  Murweh Council recognises that mobile voice and broadband data (3G) services should be applied only in their remote areas as the minimum quality standard of where new coverage is being implemented. In and around townships where Programme funds are being utilised for new base stations, 4G LTE and 3G mobile voice and broadband as a minimum quality standard should be applied.
-  Given the rapid development of technologies, and the forthcoming availability of the digital dividend, Murweh Council advocates that some kind of ratified mobile technology roadmap is implemented to ensure rural and remote areas are not disadvantaged by the digital divide.

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).

-  Murweh Council recognises the need for minimum quality standards to be measured scientifically based on the standards used by the mobile devices themselves. On this basis the received service signal indication (RSSI) is the right standard to use. To achieve the maximum impact when communicating with the public however the standards for 3G and 4G captured within the phones allows for a scale between zero and 31 for the GSM (3G & voice) and between zero and 63 for the 4G network.
-  By adopting the RSSI standard and communicating utilising some form of colour coding (i.e black and zero signal strength, red for the bottom third, blue for the mid-range and green for strongest signals) this relatively complex concept can be more readily understood by the community who are an important part of the consultation process.

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

-  Murweh Council supports the objective of mandatory local input to the 'list' of base station locations. Local knowledge and local appetite for improved mobile phone and broadband coverage will be an important driver of both the potential for a local contribution (in kind) and driving the demand once services in place. User experience rather than the theoretical network coverage maps is a more accurate way to identify areas of no coverage. A crowd sourced evidence base would provide a better way to allocate commonwealth funds.
-  Murweh Council is prepared to investigate ways it can contribute towards the Programme and expand the total number of sites achieved and community/businesses benefiting. As a local council, Murwehs potential to contribute should be recognised via various in kind support mechanisms instead of cash only.
-  Potential local government in kind support may include:
 - Civil works for site access
 - Peppercorn lease arrangements
 - Assistance with coordination of power
 - Streamlining of planning approval / development assessment process
 - Initiatives that drive 'demand' and uptake of resultant services

-  Early engagement with local councils and or community is essential for optimal Programme success. Programme contract provisions should include a directive for MNOs to undertake this engagement.
 -  Competition as well as coverage is also important. Many of the visitors to our region are accustomed to multi carrier services and can be disadvantaged by the lack of connectivity at a time when the need for connectivity is much higher due to the remoteness.
 -  Success of the Programme should not be measured solely by 'new' square kilometre voice signal coverage increase but also take into account upcoming Machine to Machine (m2m) requirements. In essence the delivery of both data and voice is essential.
 -  Furthermore, the definition of 'black spots' should also include areas where there is low signal strength coverage but also a low level of user experience relating to data transmission performance resulting in near unusable data service on the ground.
 -  Is a capacity for the government to influence the ACMA licence fees in the locations identified as part of the Programme as another initiative focused on the total cost reduction that all other parties are expected to contribute towards
4. **Could options 3(a) or 3(b) for the \$80 million Mobile Network Expansion Project be delivered in conjunction with options 1 or 2 to enable network infrastructure providers to compete with MNOs?**
-  Given tThe relatively limited size of the Programme, it is unlikely that this is a viable proposal and is not supported. Taking this approach is likely to reduce the real benefit to the end users.
5. **Should bidders be able to propose to incorporate the use of base stations owned by NBN Co as part of their bid?**
-  Murweh Council area is not currently expecting to have NBN Co base stations. The concept of utilising these NBN Co base stations is supported however on the basis that it is expected to achieve additional efficiencies in the Programme and result in more coverage in more locations.
6. **Should a joint bid (between a specialist network infrastructure provider and a MNO) be permitted? Should it be encouraged?**
-  Where a joint bid increases the total funding pool and end user outcomes it should be encouraged in sofar as the joint bid demonstrably contributes to the coverage, capacity and capacity objectives of the Programme
7. **Is it realistic to expect specialist network infrastructure providers to provide backhaul (recognising that they would presumably need to contract with a third party to provide this)?**
-  N/A
8. **Is option 3(b) suitable for Australia's regional mobile market?**
-  Option 3(b) is suitable for all areas where there is current market failure. Government subsidy initiatives such as this Programme or a Government owned wholesale only mobile network is required to address this situation. The likelihood of the current market environment to support this option is low. If the government sees value in pursuing this option, regulatory reform may be necessary to achieve it.
9. **What are the appropriate specifications for a base station to be able to accommodate at least two other MNOs?**
-  The essential specifications are:
 -  Planning approvals to support sufficient height

- base station height to service the local area and achieve backhaul where fibre is not available
- actual engineering requirements materials, type - pole, lattice, etc. guy wires for very high sites
- power supply and battery backup for times of power down
- lease area sufficient for multiple cabins etc.
- back haul transmission to support multiple MNOs.
- Encouragement of single contractor deployments to allow one specialised contractor to operate across all equipment (this is rare but is where significant cost savings can be achieved in deployment and maintenance of sites.

10. Will the proposed open access provisions be sufficient to encourage other MNOs to use the base stations to provide mobile services?

- 📌 Colocation on a single site is key to the potential for reduced costs and increased competition arising from the funding Programme
- 📌 some form of pre-commitment arrangement to ensure that MNOs will use the base station within a specific time is recommended to be included in the Programme.
- 📌 Achieving long-term viability through this Programme, sites that are at the current edge of viability. It is unclear whether the proposed open access provisions will be sufficient given the various levels of success this concept has had in an environment where carriers are competitors funded solely by private sector and commercial factors. Regulatory reform may be necessary.

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

- 📌 Yes. Ensuring that this occurs will need to form part of the funding agreement for the carrier (s). This way the clawback funds (for non-performance) would be enabled and avoid the reoccurring suggestion of regulatory reform.

12. What is the estimated additional cost of requiring all new base stations to meet the open access requirements?

- 📌 N/A

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?

- 📌 Murweh Council is unlikely to be able to apply for funding under this part of the Programme, however the overarching principles of increasing competition coverage and capacity remain a key objective of both parts of Programme and apply equally here.

14. What are the most appropriate models/benchmarks for establishing access and backhaul pricing, and for reflecting in that pricing the value of the public funding received by the owner of the facilities (such that access seekers receive an appropriate discount from the market price for access to the facility)?

- 📌 Murweh Council is not in a position to specify the appropriate model/benchmarks for establishing access and backhaul pricing. Some key principles can however be advocated. Where one carrier is able to charge multiples of the price it would charge in a competitive environment due to its monopolistic position in the marketplace is a natural barrier to the expansion of competitive networks in Australia.

- if the government or the ACCC was to institute a pricing regime to declare transmission services designed to reflect actual costs, significant expansion may occur beyond the current coverage or provide for additional competition in rural and remote areas

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

- Murweh Council would like to encourage the following provisions to be added to the proposed assessment criteria to ensure the right balance and best value for money outcomes are achieved from the Programme:
 - Local government / regional / local community input provisions
 - No competition outcome (where applicable) provisions
 - No capacity improvement measurement (where applicable) provisions

16. Should the proposed assessment criteria be weighted, and if so, how?

- However the assessment criteria is weighted a test should be applied to ensure that genuine competition, capacity, coverage and public value are demonstrably achieved

17. Is there a more effective means of assessing seasonal demand than proposed in criterion 3(c)?

- In addition to the current criterion proposed in the discussion paper the following suggested as additional means of assessing seasonal demand:
 - Vehicle movements
 - Emergency / disaster statistics
 - Conference / Festivals calendar and attendance numbers



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

- Murweh Council as previously indicated is not likely to be a beneficiary of the current fixed wireless Programme. It must be recognised however the use of the NBN fixed wireless network will result in improvements to mobile coverage outcomes in regional Australia and therefore Murweh. To this end the following comments/suggestions are offered:
 - NBN fixed wireless towers should be utilised where possible in any new sites funded by the Mobile Coverage Programme. The use of NBN Co transit fibre where available as backhaul for new Programme sites would be beneficial and should be utilised.
 - The NBN Co fibre local and distribution network as an additional source of backhaul transmission should be utilised where possible in any new sites funded by the Mobile Coverage Programme.
 - NBN Co Satellite as Backhaul – there is a possibility that in some strategic locations in Australia, the use of the NBN Co Satellites as mobile back haul in remote areas of Australia may be feasible and warrants investigation. If feasibility is assessed as viable this will be an additional revenue stream to NBN Co and provide the mechanism to introduce competitive choice of mobile services to remote Australia.




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

- As above


20. In addition to base station location, design and backhaul access, what other considerations would NBN Co need to take into account if it were to also support mobile coverage and competition benefits as part of its mandate?

-  Require greater engagement with MNOs
-  Require additional internal NBN Co expertise

21. How can early engagement between NBN Co and MNOs be facilitated in the design of each base station? Is there a role here for the Australian Mobile Telecommunications Association (AMTA)?

-  There is a clear need for early engagement. The government as owner of NBN Co and the administrator of the Mobile Coverage Programme has the greatest capacity to influence either directly or indirectly how much of this early engagement occurs.
-  Another aspect of early engagement that is vital to the success of this Programme is the mechanisms that need to be put in place for the early involvement of local stakeholders including the local council.
-  The aggregate value of the Programme to Australia will only be maximised where carrier, state, local (and other contributing organisations), NBN Co and Commonwealth government funds are pooled on site by site basis. The design, structure and timing to achieve this maximum benefit is important.

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

-  By including the measures outlined above within the Programme provisions.