

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:	██████████
Name of organisation:	NSW Farmers' Association
Phone:	██████████
Email:	██
Website (if applicable):	
Date:	10/04/2014

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.



Federal Government Mobile Coverage Programme

February 2014

NSW Farmers' Association

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Introduction

NSW Farmer's Association welcomes the opportunity to provide input to the Federal Government's mobile coverage programme and the \$100 million funding commitment to improving mobile coverage in regional Australia.

The NSW Farmers' Association represents the interests of commercial farm operations throughout the farming community in outer-metropolitan, regional and remote NSW.

Given the large distances associated with living in regional areas, telecommunications plays a vital role in farm business operations, fostering social and community activity as well as information dissemination. Unfortunately with lower population densities these areas do not get the same focus on service delivery.

NSW Farmers considers mobile coverage in regional areas an essential service and have long advocated for equitable services and equitable prices for regional users.

NSW Farmers welcomes the funding commitment to expand mobile coverage, furthermore we encourage the Federal Government to develop a long term, coordinated plan to address ongoing coverage and competition issues in regional areas and a funding mechanism alongside the plan to ensure coverage is progressively improved.

Current Environment

Inadequate mobile phone coverage for data and voice services continues to be an issue for farmers and regional communities across NSW. The issues range from the adequacy of coverage and the capacity of mobile services to cope with increasing user demand, to customer service and pricing. NSW Farmers recently undertook a survey of farmers from across NSW to better understand how regional users currently interact with mobile services and the barriers which limit the effectiveness of mobile service in these areas.

Over 97% of those who responded to our survey consider mobile telecommunications an essential service. However, the responses to our survey indicate that only 14% of farmers have definite on farm mobile coverage for voice services and 13% have definite on farm coverage for mobile internet activities. While there has been some recent expansions of coverage from mobile network providers across NSW, this has offered limited improvement for the farm sector with 85% of our survey respondents indicating that they have seen no improvement in coverage over the past two years.

The limitations of coverage in regional areas has resulted in a dissatisfaction amongst regional users in terms of service and coverage. 68% of respondents to our survey indicated that they were unhappy or very unhappy with the current mobile phone coverage they are receiving.

The results from our survey as well as anecdotal information suggest there is a stagnation in the expansion of mobile coverage in regional areas as well as the capacity of mobile services to allow regional populations to utilise data applications.

In terms of the current composition of the mobile telecommunications market in regional NSW, Telstra is the dominant service provider with over 95% of survey respondents reporting that Telstra is their current provider.

Given the current telecommunications environment, it is important that improvements in mobile coverage are made to ensure the farming sector and regional communities have equitable access to essential mobile services. For standard telephone and payphone services, there is a universal service obligation to ensure that all people in Australia, no matter where they live or conduct business, have reasonable access, on an equitable basis, to these services. Across NSW, mobile coverage is now considered an essential service for personal, business and emergency needs. As such, NSW Farmers is supportive of public funding towards telecommunications infrastructure to ensure that areas which may not receive services on a commercial basis are able to access essential telecommunications services.

Delivery Method

NSW Farmers believes that the design and delivery of the mobile black spots programme should take into consideration the following suggestions.

Delivery Option 1:

In terms of Delivery Option 1, NSW Farmers is concerned with the prospect that locations would be determined solely from the bid of the successful MNO. NSW Farmers believes that with the contribution of public funds, the delivery of the mobile blackspots programme should take into consideration the input on black spot areas which the Department of Communications is collecting from individuals and communities.

As detailed in Delivery Option 1, the government contribution should not simply subsidise the next phase of mobile expansion already planned to be built in the next three years by the MNOs. The towers under this programme should be additional and delivered with a specific focus on those areas which are not likely to receive expanded mobile coverage on a commercial basis in the coming years. The 2011-12 Regional Telecommunications Review recommended that priority areas for tower locations should be developed with “community input”.

NSW supports the requirement under delivery Option 1 that open-access and co-location requirements are made to other MNOs at equitable prices. This includes equitable pricing to the tower infrastructure and also equitable pricing for any of the backhaul infrastructure. NSW Farmers believes that such a provision could facilitate greater retail price and service competition in regional areas and is consistent with the recommendation in the 2011-12 Regional Telecommunications Review which supported open access for co-location under a co-investment program.

Delivery Option 2:

NSW Farmers recognises the greater degree of flexibility in delivery Option 2 which would allow a number of MNOs to be able to access funding for base stations on a case-by-case basis. As Telstra is the dominant mobile service provider in regional NSW, it could be argued that they are in an advantageous position in terms of their ability to bid for funding, particularly under delivery Option 1. While coverage is the first and foremost concern for regional users which should be addressed under this programme, the potential of Option 2 to introduce retail competition into certain regional markets is desirable and may potentially lead to more positive customer service outcomes and pricing of mobile services for regional users.

Similar to Option 1, NSW Farmers supports the provision open access for co-location on mobile infrastructure under this option.

NSW Farmers believes that it is necessary for coverage to be the primary consideration in terms of the location of base stations. For instance it should not simply enable a MNO to bid for a base station in an area where they do not currently have coverage but another MNO does. This would result in no net benefit in terms of coverage expansion.

NSW Farmers has some concerns with the proposal that base stations may be removed from the order of merit list if negotiations cannot be satisfactorily concluded. This may lead to some legitimate and worthwhile locations being removed. NSW Farmers believes the Department of Communication could play a determining role in awarding funding to an MNO for the base station in such circumstances.

Delivery Option 3:

NSW Farmers believes that there is some merit in Option 3 operating in conjunction with Options 1 or 2. The ability for MNOs to compete directly with network infrastructure providers for funding increases competition in the tendering process. It also maximises competition in regional markets with the potential for multiple MNOs being able to access the infrastructure. As with the other options, the guiding principle for this delivery option should be the ability of network infrastructure provider to incorporate the community feedback on black spot areas and the expansion of coverage into those areas which currently do not have any mobile coverage.

In terms of particular community groups or organisations being able to submit proposals for the building and ownership of network infrastructure, we would encourage the Federal Government to consider the merit of these proposals particularly if it is going to provide new coverage into an area and the community group has a strong business case, support from an MNO and the to ability fulfil the long and short term obligations.

Similarly, joint bids between an MNO and a specialist network provider should be permitted with the proposal assessed on it's merits and ability to meet the criteria of expanding coverage as well as the offering of open access arrangements.

The incorporation of NBN Co base stations should be a separate arrangement between NBN Co and individual MNOs. In order for this program to leverage the greatest amount of funding to expand mobile coverage into new areas, bidders should not be able to include NBN Co base stations. NSW Farmers is concerned that if this does occur, it may result in the Mobile Black Spots Programme cross subsidising the NBN Fixed Wireless Program. NBN Co has a structured roll out program for fixed wireless infrastructure in regional areas as well as separate government funding. NSW Farmers

encourages and supports NBN Co working with MNOs to explore the opportunities to utilise infrastructure separately.

Black Spots Project

NSW Farmers disagrees with the proposed structure of the \$20 million dollar mobile black spots project and would urge the federal government to incorporate the funding into the \$80 million program. NSW Farmers believes that the principal focus of funding for mobile black spots should be on the expansion of coverage into areas which do not currently experience an adequate amount of continuous signal. In particular those areas which are unlikely to experience any improvements in coverage on a commercial basis and where government co-contribution is necessary.

NSW Farmers believes that areas of high seasonal demand through tourism are more likely to receive upgrades to their mobile capacity on a commercial basis due to the population demands. As this program does not have a particular focus on expanding the mobile coverage footprint rather capacity to deal with peak demand, it is not consistent with the recommendation in the 2011-12 Regional Telecommunications Review that “government co-contribution expand the mobile coverage footprint in parts of regional Australia where it is not commercial to do so”.

Quality Standard

In terms of a minimum quality standard for MNOs to provide under the program, it is difficult for NSW Farmers to prescribe a particular standard across the board and it may differ across different geographical regions. From the point of view of user experience and demand, NSW Farmers would suggest that mobile services provide adequate coverage for voice and data services. Our survey indicated that currently 44% of farmers use email and internet on their mobile phone and 68% are unhappy or very unhappy with the current coverage they are receiving. With the 2011-12 Regional Telecommunications Review noting that ‘access to mobile broadband and voice services are important to capture the next generation of productivity improvements in the agricultural sector’, the minimum quality standard should be responsive to the current usage and unmet demand in regional Australia.

Assessment Criteria

Micro and Picocells:

NSW Farmers supports the ability of MNOs to be able to incorporate and use additional complementary technologies such as microcells and picocells to improve/expand

services in particular areas. Due to the nature of small regional communities and the geography of these regions, it is often not commercially viable for base station services to be expanded into all areas. In some instance communities are currently within a macrocell base station footprint, yet are unable to receive services due to geography such as valleys. If complementary technologies are able to include these towns and communities, NSW Farmers beleives MNOs should be encouraged incorporate this into their bids.

Priority Locations:

NSW Farmers supports the priority program locations, however would caution against simply focusing on providing coverage along major transport routes.

New Coverage:

NSW Farmers supports the criteria of expanding coverage into new areas which have previously not had any coverage before. However under this criteria it may also be important to consider expanding into areas where there is currently not a high prevalence of continuous signal at the moment.

Coverage Benefit:

The extent of coverage benefit should not only take into consideration the list of geocoded Australian addresses but also different industry operations in particular areas. In agricultural areas, employment may increase the number of people in these areas and additionally with activities such as shearing and harvesting.

NBN Fixed Wireless

NSW Farmers believes that the NBN fixed wireless network has the potential to improve mobile coverage and competition in regional Australia. As a wholesale network, this infrastructure has the ability to service a number of MNOs as well as provide competitive baukhual arrangements. Given this potential, NSW Farmers agrees that NBN Co fixed wireless could be specifically designed to support co-location of equipment, that consideration should be given to mutually beneficial locations and that backhaul should also be provided at competitive rates to MNOs.

Appendix 1: Mobile Black Spots in NSW

(Based on responses from NSW Farmers 2014 Telecommunications Survey)

Whyralla, NSW	Faulkland, Gloucester Tops Road, NSW
Tatham, NSW	North of Dunedoo, NSW
Bringagee rd, Griffith, NSW	Baryulgil, NSW
North and Northeast of Ivanhoe, NSW	Upper Myall, NSW
Gooloogong, NSW	North of Merriwa, NSW
Bundook Road, Tugrahakh, NSW	Booral, NSW
Naradhan, NSW	Oakbank Trungley Road, Trungley Hall, NSW
Pacific Highway from Kempsey to Port Macquarie, NSW	Bevendale, NSW
Euroley, West of Narrandera, NSW	Mulloon Road, Mulloon NSW
Tharbogang, NSW	Rennie, NSW
Hillston, NSW	Mates Gulley Road Borambola, NSW
The Springs Road, Hillston, NSW	Burrumbattock, NSW
Cawongla rd, Rock Valley, NSW	Aberaldie Rd, Walcha, NSW
Between Parkes and Eugowra, NSW	Branch Creek, Ellerston, NSW
St Helena's Hill, NSW	Wanganella, NSW
Savernake, NSW	Upper Mole River, Tenterfield, NSW
Beatties Island Road, Tugrahakh, NSW	Fordwich road, Fordwich, NSW
Gollan, NSW	Bowraville, NSW
Warburn, NSW	Black Willow Road, Hargraves, NSW
East of Tenterfield, NSW	Cherry Tree Hill to Graman, NSW
Rankin Springs/Hillston, NSW	Yaven Creek Rd, NSW
Skinner's Road, Pillar Valley NSW	Attunga, NSW
	Osborne, NSW

Cawongla Rd, Larnook, NSW	Corinella, NSW
East of Berrigan, NSW	Fairholm, NSW
Morongla Creek Village South of Cowra, NSW	Between Murrulebale and Temora and Coolamon-Ardlethan Rd, NSW
Baerami Creek, NSW	Lidster Hill, NSW
Jemalong, NSW	Aberfoyle, NSW
West of Gloucester, NSW	Oakey Creek Road, Spicers Creek, NSW
Bald Blair, NSW	Wantabadgery, NSW
Cassilis, NSW	Eulimore Rd along Escort Way to Murga, NSW
Mundongo, NSW	Walcha, NSW
Burrundulla, Mudgee, NSW	Comobella area north of Wellington, NSW
East of Dareton, NSW	Yaven Creek, NSW
North arm rd Bowraville, NSW	Lowther Creek, NSW
Eastern side of Goobang National Park to West of Yeoval, NSW	Mt Bindo, Hampton, NSW
Pine Ridge, NSW	Snowy Mountains Hwy
Pyes Creek Rd, NSW	Rocky Creek area on Killarney Gap Rd, Narrabri, NSW
Thunderbolts Way from Dangar's Lagoon to Walcha, NSW	Mongarlowe, NSW
Ulan Rd Turill, NSW	Therribri Road, Boggabri, NSW
Berkley Downs, NSW	Baerami Creek Valley, NSW
North of White Cliffs, NSW	Cooks Myalls, NSW
Birrawa, NSW	Yancannia, Whitecliffs, NSW
Gocup Road, NSW	Baldry Road, Cumnock, NSW
East, South & West of Nevertire, NSW	Munyabla Munyaplah Road, West of Henty, NSW
Kikoira Village, NSW	Baldersleigh Rd, Guyram, NSW
Bedgerebong NSW	

Mt Tangory, Glendonbrook, NSW	Bodalla, NSW
Big Jacks Creek, NSW	East Lynn Rd, Walcha, NSW
Limekilns Rd, Limekilns, NSW	Sissons Rd, Aberfoyle, NSW
Boona Mountain, NSW	Geurie, Bodangra, Comobella areas, NSW
Mitchell Hwy, Rawsonville to Brummagen, NSW	Borambola, NSW
Baldry Road, Cumnock, NSW	East Parkes, NSW
Albert, NSW	Big Jacks Creek Road, NSW
Firth Heinz Rd, Pillar Valley, NSW	Orange Rd, Parkes, NSW
South East of Bingara on Copeton dam Rd, NSW	Sandigo, NSW
Oivi Lane, Wantabadgery, NSW	East of Coolabah, NSW
Wantabadgery Village, NSW	Yarrabin, NSW
Dry Plains NSW	Henry Lawson Way, Young, NSW
Condobolin Road, Parkes, NSW	Between Woodstock & Canowindra, NSW
Canowindra Rd , from Nanima Lane to Nyrang, NSW	Yungundi Road, Collie, NSW
Bogandillon Swamp, NSW	Rannock, NSW
Kellsdale Rd, Wantabadgery, NSW	South West of Bundarra and Bakers Creek Valley, NSW
Yarrabin Road Mudgee, NSW	Laggan, NSW
West of Boggabri bordering the Pilliga Forest, NSW	Baldry road, Cumnock
Muttama Rd, NSW	Mt Canobolas, near Springside, NSW
Goorangoola Road, Greenlands, NSW	Kikoira, NSW
Mitchell Highway Orange, NSW	Jamberoo Saddleback Mountain, NSW
Weemelah, NSW	Savernake, NSW
PineRidge, Denmirs Rd, Mendooran, NSW	Gidginbung West area, NSW
Enngonia, NSW	Avondale Road, Gilgandra, NSW
	Gurrundah, NSW

Gerara, NSW	Ben Nevis Rd, Glencoe, NSW
Gobarralong, NSW	Roslyn, NSW
Between Deepwater and Tenterfield, NSW	Spicers Creek, NSW
Wilgadene, Oxley Highway, Carroll, NSW	Cobbadah, NSW
Weilmoringle, NSW	Wantwood Road (Booligal Rd,) Gunbar via Goolgowi, NSW
Macullochs Range between Wilcannia and Emmdale, NSW	Between Culcairn & Holbrook, NSW
Watsons Creek, NSW	Daysdale NSW
IGraham Rd & Kidman Way, Coleambally NSW	Kialgara, NSW
Wee Jasper, NSW	Boro Creek Valley east of Tarago NSW
Werrina, Bruxner Road, Mungindi, NSW	Colly Blue Island, Spring Ridge South, NSW
Gloucester District, NSW	Halls Creek Bunnan and Merriwa, NSW
Cobramunga, NSW	Kelvin Grove, Gunbar Rd, NSW
Thunderbolts Way - Uralla to Walcha, NSW	Tabbita, Goolgowi to Hillston area, NSW
Dog Rocks Road Rockley, NSW	Glassers Rd, Aberfoyle, NSW
Darlington Point, near Carrathool, NSW	Whites Lane, Rous via Alstonville, NSW
Andersons Road, Armidale, NSW	Booral, NSW
Kikoira to Ungarie, NSW	Westys, Blue Nobby Road Enmore Uralla, NSW
Abrabaldie Road, NSW	East of Walcha on Oxley High Way
West of Young on Milvale rd, NSW	Brungle Creek Road until Brungle Village, NSW
Mt Lindsay Rd, NSW	Mullumbimby, NSW
Ardnaree, Tubbul, NSW	Maybole Road Ben Lomond, NSW
Wandsworth, NSW	Weja to Kikoira, NSW
Pooncarie Rd, Via Wentworth NSW	Brocklesby, NSW
Whealbah region Hillston, NSW	Seven Gates Rd, Adaminaby, NSW
Breeza Hill, NSW	Burrumbuttock, NSW

Gidginbung area, NSW	Bunnerungee, NSW
Kingstown, NSW	North of Leeton, NSW
Campfire Rd, NSW	Grenbah Creek Road, Obley, NSW
South West of Nyngan, NSW	Pacific Hwy, between Coffs Harbour and Byron Bay, NSW
North Barraba, NSW	Currabubula/Stangers Lane, NSW
Bogan River District on Narromine/Tullamore Rd, NSW	Taylor's Flat, NSW
Moonbah, North of Condobolin, NSW	Melbergen Road between back Griffith Road & Melbergen, NSW
Reads Lane, Osborne, NSW	Lankeys Creek Valley, Mount Jingellic, NSW
Pretty Pine to Moulamein, NSW	Waugan, NSW
North Berthong Rd, Wallendbeen, NSW	Silver City Hwy, Wentworth, NSW
Rugby, NSW	Davis Creek, NSW
Coonamble, NSW	Comobella, NSW
Baldry, NSW	East of Dunedoo, NSW
Belaringar, Nevertire, NSW	Between Narromine and Tottenham, NSW
Seberrys Lane, Walleroobie, NSW	Burmah, GRAMAN, NSW
Paling Yards, NSW	Upper Clarence Valley, NSW
South of Brocklesby, NSW	Between Temora and Coolamon, NSW
Michell Lane, Delungra, NSW	Cr Marra North Rd & Coffin Rock Lane & McRae Lane Marra, NSW
Coolah towards Cassilis, NSW	West of Booligal, NSW
Ivanhoe Road, Balranald, NSW	Stidwells Lane , Ungarie, NSW
Blakney Creek Rd South, Yass, NSW	Palmers Oakey, NSW
Dolgelly Road, between Goondowindi, QLD and Boomi, NSW	Booral, NSW
Jerrys Meadow Road Sodwalls, NSW	John's Top, South of Lockhart, NSW
Rocky Creek, NSW	

Erigolia road, Binya, NSW	Windella, NSW
Kulnura, NSW	Rennie, NSW
Merotherie, NSW	Jerangle, NSW
Ullingral Road, Merriwa, NSW	North of Dunedoo, NSW
Weja, NSW	Lue, NSW
Cobbora area, West of Dunedoo, NSW	Between Lithgow and Ilford, NSW
Bygalore, NSW	Tooraweenah, NSW
Dubbo to Peak Hill Highway, NSW	Towrang Road, Towrang, NSW
Gooloogong Road, Grenfell, NSW	Urana Rd, Burrumbuttock, NSW
West of Mt Canobolas, NSW	Ison Road, Yarrie Lake, NSW
Jenolan Caves Road, NSW	Wongwibinda near Armidale, NSW
between Temora and Ariah Park, NSW	Euchareena, NSW
Winchendonvale, NSW	Wisemans Ferry Road, Mangrove Mountain, NSW
Reids Flat, NSW	Nubrygyn Creek area, NSW
Wulluman, NSW	Between Booligal and Mossgiel, NSW
North Prairie, West of Newell Highway, NSW	Brindiwilpa Stn, SE of Tibooburra, NSW
Boree Creek, NSW	Maragle South of Tumbarumba, NSW
Wantabadgery via June, NSW	Gunbar, NSW
Merriwa Rd, Willow Tree, NSW	White Rock Mountain, West of Glen Innes, NSW
Table Top Rd, Walcha, NSW	East and west of Uralla, NSW
Enmore Via Uralla, NSW	Hallsville, NSW
Gubbata, NSW	Nevertire, NSW
Between Grenfell and Young, NSW	Between Wentworth and Coombah, NSW
Windella, NSW	General Middle Arm, NSW
Drunglear Rd, Tenandra NSW	Ooma, Glenelg, NSW

Braidwood Road from Nowra, Nerriga, NSW	Bonalbo, NSW
Goolma, NSW	Spicers Creeek, NSW
Bramble Rd, Black Hollow, NSW	Cookardinia Road, Morven-Wagga, NSW
Bogamildi to Luellan along the Newell Highway, North of Moree, NSW	Farralls Lane, NSW
Westwood Road, Yavern Creek Road, Adelong, NSW	Wallerooobie, NSW
Cnr South Coree Rd and Lignum Lane, NSW	Old Grevillia, NSW to QLD Border
Between Leeton and Stanbridge, NSW	North of Goulburn, NSW
Craigie, NSW	Savernake, NSW
Morundah, NSW	Moorefield Road, Coolah, NSW
Mabins Well, NSW	North of Wanaaring, NSW
South of Oberon, NSW	Urbenville, NSW
Cowabbie, NSW	West of North Star, NSW
Valleys between Merriwa and Cassilis, NSW	Graham's Valley near Ben Lomond, NSW
Salisbury Plains, NSW	Paynes Rd, Tallimba, NSW
Mendooran- Tooraweenah- Baradine, NSW	Wollomombi, NSW
Grenfell to Young, NSW	West of Cumnock, NSW
Mt Baw Baw Road, NSW	Bigga, NSW
Balranald, NSW	Centre of Wellington-Mudgee Rd, NSW
Soldier Settlement Rd, near Lockhart, NSW	Kingsvale, NSW
Spicers Creek, NSW	Urbenville, NSW
Bishops Rd, NSW	Greenwich Park, NSW
Brackendale road, NSW	Rugby, NSW
Bruxner Highway between Casino and Tenterfield, NSW	Hezlett Road, Kellyville, NSW
	Pulletop, NSW
	Savernake/Riverina Highway via Berrigan to Albury, NSW

Between Garah & Boomi NSW	Ilford area Castlereagh Hwy before turn off to
Lambing Hill Rd, Goolma, NSW	Kandos, NSW
Windellama, NSW	Between Cumnock and Molong - west of
North Molong to South of Wellington, NSW	Cumnock Molong Road, NSW
Blayney, NSW	Middle Arm Rd, Goulburn, NSW
West of Barraba, Pembury, NSW	North of Condobolin on Condobolin-Cobar Rd,
Yaven Ck Rd, NSW	NSW
Mt Burra, Gundagai, NSW	Barrington, NSW
Durham road east, Gresford, NSW	Gostwyck, NSW
Brobenah to Ardlethan, NSW	Owen Gap, NSW
Wellingrove village, NSW	Mitchell Hwy and Rawsonvillebridge Road,
Cobbadah, NSW	West of Dubbo, NSW
Moorwatha, NSW	Cootawundi, White Cliffs, NSW
Berkley Downs, NSW	Enmore Station Road, Enmore, NSW
Wiagdon, NSW	Kingstown, NSW
Dungowan, NSW	Harefield, NSW
Between Inverell and Graman, NSW	Eulah Creek Road, Narrabri, NSW
Binya, NSW	Come By Chance, NSW
Ogunbil, NSW	Hatfield, NSW
Braidwood Road from Nowra extending past	West Boomi on Mungindi Rd, NSW
Nerriga, NSW	Wycombe, NSW
Mary Gilmore Way (or Bimbi/Barmedman Road	Wymah NSW
from) Grenfell, NSW	Wanganella NSW
Ellerslie, NSW	Murrami, NSW
Springs Plains, NSW	Middle range near Pine Ridge, NSW
South of Walgett Nilma Rd, NSW	Pejar Dam, NSW

General Black Springs, Shooters Hill, Oberon, NSW	From Mudgee to Hill End through Hargraves, NSW
Bumbaldry NSW	East of Armidale, NSW
Balala, NSW	Ellerslie, NSW
Warialda Road (various spots between Yallaroi and Warialda), NSW	Lachlan Valley Way from Cowra to Yass, NSW
Yallaroi Road, between Coolatai and Yallaroi, NSW	Fine Flower, NSW
Ruthven/Codrington, NSW	Girvan NSW
Tabbita, NSW	Trungley Road Trungley Hall, NSW
Monia Gap, NSW	Hogan Rd Fullerton, NSW
Larnook Valley, NSW	Hurricane Gully Rd, NSW
Pheasants Nest, NSW	Pages Creek, Ellerston, NSW
Alstonville, NSW	NW of Wanganella, NSW
Allworth NSW	Bombowlee Ck Rd, NSW
Contour Trungley Road Trungley Hall NSW	Tottenham Road south of Nevertire, NSW
Turkey Hill Rd, Limerick, NSW	Hargraves, NSW
Blair Athol, NSW	Armidale to Bundarra, NSW
Savernake, NSW	Darlow, NSW
Between Cowra and Boorowa, NSW	Willenber, NSW
Mullumbimby, NSW	Between Ivanhoe and Wilcannia, NSW
Carnham, NSW	Lachlan Valley Way south of Cowra to Boorowa, NSW
Crookwell area, NSW	Withers Lane, NSW
Hurricane Gully Rd, NSW	From Baldry to Toongi, NSW
ELLERSTON NSW	Burcher NSW
Wanganella village, NSW	New Mole Rd, NSW
	Kanimbla Valley/ Coxs River, NSW

Gunbar, NSW	Bannister, NSW
Manna Mountain, NSW	Golspie, NSW
518 Goorangoola Road, Greenlands, NSW	144 grumble road Cumnock, NSW
Barringun, NSW	Cheesmans Creek, NSW
Comobella, NSW	Bridges Road Kelvin, NSW
Goolma, NSW	West of Ben Lomond to Tingha Guyra Road, NSW
Gollan, NSW	Cobb Highway, NSW
Goolma - Spicers Creek - Comobella, NSW	Between Tingha and Guyra, NSW
Sturt Hwy Bulgary, NSW	Lake Burrendong, Wellington NSW
Sturt Hwy Galore, NSW	Yelgun Wooyung, NSW
East Coolabah, NSW	30km s/e on Riverview Rd (Bald Knob), NSW
Grattai, NSW	Much of Oura Rd in Wantabadgery, NSW
Old Forbes Road, Young, NSW	Heckendorfs Road, Cumnock, NSW
Twelve Mile, NSW	Barry's Bridge, Pillar Valley, NSW
Leeches Creek Road Gilgandra NSW	South East of Bingara- Riverview Rd, NSW
Leeches Creek Road Collie NSW	Muttama, NSW
Marinna, NSW	826 Goorangoola Road, Greenlands, NSW
Roslyn, NSW	Ammerdown Hill, NSW
Baldry Road Cumnock, NSW	Wallaroi Enmore Rd Mendooran, NSW
Fourmile Creek, NSW	Sandholes Road, Garah, NSW
Merton, NSW	Townsberry - 475 Yarrawa road, Mungindi
Reefton area NSW	Thunderbolts Way - Uralla to Inverell, NSW
Rennie, NSW	Parts of the New England Highway South of Uralla toward Bendemeer, NSW
Trungley Hall, NSW	Niangala Rd, NSW
Curban/Biddon Road, Gilgandra, NSW	

Tenterden, NSW	Torryburn, NSW
East Ardnaree Tubbul, NSW	Snowy Mountains Highway, NSW
Baldblair, NSW	Tintenbar, NSW
Baan Baa, NSW	Llangothlin Village, NSW
Hamels Lane - west of Glen Innes, NSW	Burley Griffin Way, Stockinbingal, NSW
Ginagulla Hill (near Carroll), NSW	Allambie Alectown, NSW
Moredun Rd Ben Lomond, NSW	Warren NSW
Goolma NSW	Doyles Lane Walleroobie, NSW
Upper Bingara, NSW	South Condobolin, NSW
Mid-Western Hwy via Goolgowi, NSW	Along Howlong-Kywong road, NSW
Gundegular, NSW	Eenaweena Warren NSW
Rand NSW	Litchfields Lane Ardlethan NSW
Talegar, NSW	Narrabri - Bingara NSW 2390
Neriga, NSW	Killarney Gap Rd, NSW
Guyra, NSW	North of Leeton, NSW
Hilldale NSW	Lawrence area, Clarence Valley, NSW
Vacy NSW	Werris creek rd, Duri, NSW
Uralla road near Petali and Mirani, NSW	Reids Flat area, NSW
Brungle Village, NSW	Gwydir Highway, NSW
Clunes and West Bangalow, NSW	North of Moree, NSW
Ben Lomond Village, NSW	Segenhoe, NSW
Walbundrie, NSW	Upper Rouchel, MSW
Burrumbuttock, NSW	Mitchells Creek area mid way Geurie and Ballimore, NSW
Reefton area NSW	South of Dunedoo, NSW
Torryburn Road to Yarrowyck, NSW	North of Balranald, NSW

North of Oxley, NSW	Wanaaring, NSW
Clontarf, south of Lockhart NSW	Ladysmith rd Wagga, NSW
Arrandown, south of Lockhart NSW	Between Rylstone and Mudgee, NSW
Foys road, Binya, NSW	Newell Highway South of Coonabarabran, NSW
Birriwa, NSW	Euchareena Molong Road, NSW
Golden Hwy, East and West of Dunedoo, NSW	Bookham, NSW
Wellington to Dunedoo, NSW	Booligal and Griffith, NSW
Henry Lawson Way, areas between Grenfell and Forbes, NSW	Henry Lawson Way NW Grenfell, NSW
East of Mt Canobolas, NSW	Jerratbatgulla Rd, NSW
White Cliffs, NSW	Capertee, NSW
Wellington to Mudgee, NSW	Hereford Hall Rd, NSW
Mid Western Highway areas btween Grenfell and Caragabal, NSW	South of Coombah, Silver City Hwy, NSW
South of Mt Canobolas, NSW	Near the Creeks, Ardrossan, Batlow, NSW
Duckmaloi Road, NSW	Cnr Lignum Lane and Boorabanilly Road, NSW
Harden to Bowning, NSW	Corbie Hill, NSW
Binalong, NSW	Little Plains area, NSW
Harefield Via Junee, NSW	Shooters Hill, NSW
Winterbourne area Walcha, NSW	Black Springs, NSW
Naradhan, NSW	Gostwyck, NSW
Between Grenfell and Cowra, NSW	Grenfell to Forbes, NSW
Peak View, NSW	Winterbourne, NSW
Up Digilah Road, NSW	Tia Diggins road, NSW
Oura, NSW	Grenfell to Cowra, NSW
Booligal and Hay, NSW	West of Tottenham, NSW
	Ariah park, NSW

Findon Creek Road, NSW	Parts of Glen Alice Road from Bogee to Glen Davis, NSW
North of tottenham, NSW	
Bectric, NSW	Along Yeoval-Dubbo Rd, NSW
Kings Highway, NSW	Rhyanna road Goulburn, NSW
Glencoe to Ben Lomond, NSW	Parts of Lue Road between Rylstone to Mudgee, NSW
Ebor NSW	Eurimbula, NSW
Gumble area, NSW	Parts of Taralga to Goulburn Rd, NSW
Big Hill NSW	Bunnan, NSW
Rieds Flat, NSW	Glen Isla Rd, West of Dubbo, NSW
Auburn Momalong Rd off Riverina Hwy, NSW	White Cliffs, NSW
North of Moree, NSW	Wuuluman, NSW
Mayfield Rd, Tarago, NSW	Marulabar, NSW
Narrawa, NSW	Thomsons Creek, NSW
Most of Gonnoo Forest Road Mendooran to Brocklehurst, NSW	Romney Vale near Quirindi, NSW
West of Barraba, NSW	Main Balranald/Invanhoe Road, NSW
Erindale Road off Riverina Hwy, NSW	Breulah hill (between Grenfell and Cowra), NSW
Large area South/west of Goondiwindi QLD 4390	Wanganella, NSW
redlands	Narrandera, NSW
Mirrool, NSW	Warrah Ridge, NSW
WESTWYALONG TO MARSDEN TO FORBES	Tilpa village, NSW
Tycolah, Cobbadah, NSW	Paytens Bridge, NSW
Barellan, NSW	Rankin's Springs, NSW
Coleambally, NSW	Ewingsdale, NSW
	Maryvale Rd Bevendale, NSW
	Campfire Rd, Walcha, NSW

Moonan Flat, NSW	Oakdeen North of Balranald, NSW
South of Wanganella on Cobb Hwy, NSW	Uarbry, NSW
Yaven Creek, NSW	Packsaddle, NSW
Cooinda, NSW	Dubbo to Gilgandra, NSW
Upper Mole River Rd, NSW	McKanes Falls Road, NSW
West and South of Trangie, NSW	Burrumbuttock, NSW
Parkes Eugowra Rd, NSW	Mondarlo, NSW
Oberon to Taralga, NSW	Porters Retreat
Bourke, NSW	Laggan Crookwell area, NSW
Goolma, NSW	Tara, NSW
Gilmours Road Gilgandra NSW	Bigga, NSW
Fullerton, NSW	Forbes to Eugowra to Cudal, NSW
East of Uralla towards Enmore, NSW	Cobbadah, NSW
Brushy Creek, NSW	Darlington Point, NSW
Gins Leap (near boggabri), NSW	Bylong Valley Way from outside Rylstone, NSW
Grahams Valley near Glen Innes, NSW	Taralga to Oberon, NSW
Delemere, NSW	Twelve Mile, NSW
Gresford NSW	Oakdene, NSW
Alstonville, NSW	From Wallangra to Inverell, NSW
New England Highway, NSW	Griffith, NSW
Balldale, NSW	Urana Road Burrumbuttock, NSW
Warren NSW	Belltrees, NSW
Patons Lane Ardlethan NSW 2665	North Wanganella on Cobb Hwy, NSW
Lionsville, Baryugil, NSW	Bonnie Doon, NSW
Newel Hghwy south of West Wyalong, NSW	Woodside Rd, NSW



Eugowra Goolongong, Grenfell , Young Rd, NSW

Girraween, NSW

Wards River NSW

North of Gulgong, NSW

Marrapina, NSW

Dubbo to Mendooran, NSW

Rydal Hampton Road, NSW

Anna Bay, NSW

Peelwood, NSW

Tilba Tilba, NSW

Piora, NSW

Carrathool, NSW