

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: Caroline Lovell

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Date: 3 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.

3 March 2014

Lachlann Paterson
Assistant Secretary Regional Communications
Department of Communications
44 Sydney Avenue
Forrest ACT 2603

Dear Lachlann,

Response to Mobile Coverage Programme discussion paper

NBN Co welcomes the opportunity to comment on the Department's Mobile Coverage Programme discussion paper.

As you know, NBN Co is currently undertaking a strategic review of its fixed wireless and satellite programs. Given that the recommendations from this review may have relevance to the Mobile Coverage Programme, NBN Co may need to provide a supplementary response in early April 2014, after our strategic review is completed.

At this stage, our response is focussed on three points:

- the likely modest degree of geographic alignment between NBN Co's fixed wireless tower sites and tower sites that would be most relevant for the Mobile Coverage Programme;
- the potential benefits of a coordinated planning approach as between NBN Co, MNOs and the Mobile Coverage Programme; and
- the prospects for an NBN Co Cell Site Access product to play a role in connecting new tower sites to be established under the Mobile Coverage Programme.

Each of these points is discussed in turn below.

First, in relation to the likely modest degree of geographic alignment between NBN Co's fixed wireless tower sites and tower sites that would be most relevant for the Mobile Coverage Programme, it is important to note that NBN Co selects tower sites to provide broadband services to premises in areas that are generally on the fringes of the fixed line footprint. Serving premises in these areas often results in the selection of isolated sites for NBN Co towers that are far from major roads or existing mobile towers. This is in contrast to what we understand may be preferred tower sites under the Mobile Coverage Programme, which are commonly located along highways or in small settlements.

Some indication of the degree of geographical alignment differences can be gained from the more than 700 fixed wireless sites that NBN Co has acquired to date. In 65% of cases, NBN Co has needed to build its own tower on a greenfields site. This is despite giving top priority to co-location of any sort, including water towers, buildings and existing wireless towers.

It also notable that, to date, NBN Co has received very limited interest from MNOs in co-locating on NBN Co's wireless towers. NBN Co has arrangements in place with many infrastructure owners including some Mobile Network Operators (MNOs). Through these arrangements, NBN Co encourages sharing of infrastructure by allowing NBN Co to apply for locations on MNO towers and MNOs to apply for locations on NBN Co towers. NBN

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Co has also entered into arrangements whereby third party tower providers build and own towers for NBN Co to then occupy as the first/anchor tenant.

Secondly, in relation to the potential benefits of a coordinated planning approach as between NBN Co, MNOs and the Mobile Coverage Programme, these benefits must presumably be contingent on how effectively it is possible to take into account and address each of:

- The Mobile Coverage Programme priorities;
- MNO's regional growth plans for network coverage improvements; and
- NBN Co's objectives and deployment plans.

NBN Co already coordinates its site planning and selection activities with the MNOs and keeps them informed of site construction starts. These current information sharing practices could be extended to include the Mobile Coverage Programme and more formally structured to encourage good quality dialogue between the parties if that would help achieve common objectives. There is the potential for significant cost savings if co-location is feasible (either NBN Co co-locating on a tower constructed under the Mobile Coverage Programme or vice versa), and this is subject to NBN Co's coverage priorities and any technical limitations associated with particular sites.

As radio planning is completed for fixed wireless areas not yet covered by NBN Co, new opportunities will become available for coordinated planning of tower locations.

Thirdly, in relation to the prospects for an NBN Co Cell Site Access product to play a role in connecting new tower sites to be established under the Mobile Coverage Programme, NBN Co is currently developing this product offering. Throughout 2013, NBN Co shared a proposed product construct with the industry to solicit feedback on the product design. Having received this feedback, NBN Co is now preparing for product design and build activities, as part of which NBN Co will engage in further consultation on the Cell Site Access Service via its Product Development Forum. To inform these activities NBN Co has also engaged the industry in a technology trial where existing MNO cell sites are being connected to the NBN fibre access network. The trial is assisting NBN Co and the trial participants to assess various technical and other aspects of the product.

If it would assist the Department, we would be pleased to meet and discuss any aspect of this submission.

Yours sincerely



Caroline Lovell

Head of Regulatory Affairs & Industry Analysis