

REROC

RIVERINA EASTERN REGIONAL
ORGANISATION OF COUNCILS

PO Box 646
Wagga Wagga NSW 2650
ph: (02) 6931 9050
fax: (02) 6931 9040
email: mail@reroc.com.au
website: www.reroc.com.au
ABN: 91 443 421 423

28 February 2014

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

Email: mobilecoverage@communications.gov.au

SUBMISSION TO MOBILE COVERAGE PROGRAM

I write on behalf of the Riverina Eastern Regional Organisations of Council (REROC) to respond to the discussion paper for the mobile coverage program. REROC is a voluntary association of 13 general Councils and 2 water county Councils. Our members are the Councils of Bland, Coolamon, Cootamundra, Corowa, Greater Hume, Gundagai, Junee, Lockhart, Temora, Tumbarumba, Tumut, Urana and Wagga Wagga and Riverina Water and Goldenfields Water County Councils.

This region suffers from areas with inadequate coverage and has become a significant issue in relation to emergencies such as bushfire and floods that occur in our region. The issue of mobile coverage and blackspots is considered important in how we conduct our daily business. Councils provide access and services across a physically broad area that whilst not heavily populated produces vast resources. The need for mobile coverage cannot be broken down to economic return of MNO's only.

The discussion paper is based around the premise that market forces will determine the location and provision of infrastructure to support the mobile phone coverage network. The fear is that this will not provide adequate coverage to those areas that do not have the paying customers to support the MNOs infrastructure costs. There are areas within our communities that require this service for safety regardless of cost to the provider.

As mentioned all the proposed options revolve around market forces and therefore return on investment by the MNO. The location and coverage needs to be considered by way of consultation and not rely solely on investment return of business to determine coverage.

Currently in rural and remote areas the issue of improving competition is difficult to resolve because the numbers do not stack up for one provider let alone enough for competition to occur. This does not mean that these areas (as indicated 75% of the land mass) are any less important for the

councils working together

receiving of mobile coverage. It is hard to see how the proposed options will improve competition, when most rural areas are really only serviced by a single provider now.

There is little detail around the options within the blackspot program that require local communities or Councils to aid in the provision of infrastructure. As it is proposed that this be shared infrastructure there must be more detail on who will own the infrastructure and who will be responsible for meeting the operational costs or commercial advantage.

As identified in the discussion paper there are significant synergies available under the NBN Co rollout and this matter needs to be seriously considered and legislated to allow co-location to occur.

Summary

The allocation of \$100 million is welcomed. REROC requests that this money be spent wisely to provide maximum coverage of existing black spots. Consultation must be undertaken to determine not only economically viable areas but also important coverage for safety and operational purposes.

We welcome this opportunity to provide feedback on the discussion paper and trust that the Federal Government will consider all possibilities to improve mobile phone coverage in the regional, rural and remote areas of Australia.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Julie Briggs', with a horizontal line underneath the name.

Julie Briggs
Executive Officer