

# 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:** Stephen Turner

**Name of organisation:** personal

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**Website (if applicable):**

**Date:** 26/12/2013

#### 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  Yes

*If yes, identify below which parts of the submission are to be treated as confidential (and provide a reason):*

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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](mailto: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.

The Manager  
Mobile Coverage Programme  
Department of Communications

[REDACTED]  
[REDACTED]  
[REDACTED]  
19/01/2013

Dear Sir below is my submission to the Mobile Coverage Programme.  
Also please accept this as notification of a mobile phone black spot.

The Geographical area that is a mobile phone black spot and that I live within, is covered by topographic map Mimosa 8328-1 & IV.

I also have attached a Telstra coverage map of the area affected with the 2 main black spots indicated. The area is between Coolamon and Temora in Southern NSW and takes in the locations of Rannock, Mimosa and Bectric.

We have poor mobile coverage on our farm, with no handheld coverage. We have three phone antennas on our house roof (one for our internet) and one each on the tractor, header and utility. Some things we would like to use the mobiles and mobile data for are:

- marketing,
- weather and emergency updates,( Rural Fire Service)
- GPS guidance and auto steer correction,
- social networking
- enhancing safety
- on farm and between farm communication

In my opinion:

The criteria of assessment should not be weighted too heavily towards return on investment or else it will just be reducing the cost to MNO's of area's they were already going to service. It should be weighted to areas that are just unviable as standalone projects.

It should be designed to fill in black spots so as to improve coverage as people move around. The assessment should also only include new coverage, not upgrades to current towers, as I understand most of the Telco investment today is designed to improve data flow from existing towers, to supply increased data demand.

It should take advantage of current proposals and projects of the NBN. The NBN towers should be able to cater for mobile phone transmitters and encourage their utilization

More money than the proposed \$100 million should be spent on black spots, particularly if you compare it to the ~\$40 plus billion proposed for the NBN. If the NBN cost was reduced by just 1% then you could increase the funding for black spots by \$400 million. Many young people today get all they're internet data from mobile phones.

Delivery option 1

Regarding the questions 1 and 2;

The question of whether it should be 4G LTE or just 3G is a good one. Areas such as Mimosa that are large and marginally viable need extended coverage. 3G uses the frequencies 850-900 MHz and has more range compared to 4G which I understand currently uses the frequencies around 1700 -1800 MHz and has less range. I know that 4G is more useful for data and internet use, but considering it is not yet available in larger centres, it is unlikely to be viable at Mimosa. Also much of the extra data demand could be taken up by the NBN fixed wireless.

I understand that the frequency 900MHz is used by Telstra now and that 700MHz should be available in December 2014 for 4G LTE. I believe that it would need to be of these lower frequencies to get useful coverage in rural areas. This might be one way of extending the coverage of 4G LTE from fewer towers.

It would still be important to have the best quality 3G service possible, as it would still be used a lot for mobile data and also homes using a mobile internet service that are not able to access fixed wireless. The transmission strength and quality should be the same or better than is currently sent from the Coolamon phone tower.

If using just 3G for all of these black spots allowed more towers to be installed and it meant that Mimosa got some coverage then I would be in favour of that.

### Delivery option 3

Network infrastructure provider to co-ordinate implementation.

The model where funding is given to pole builders is preferred as it allows more operators to use each tower. This allows people to move around the areas using just one carrier. What is the point of one geographical area having one provider and the neighbouring area having another (they are not called **mobile** phones for nothing).

In our situation the NBN is going to build a fixed wireless tower at Rannock (NBN Co site 'Sunnyside' 88 Freers Lane Rannock). When we have suggested to Telstra that they could use this tower as a mobile phone tower, they have not been interested at all.

The NBN fixed wireless tower at Rannock would be perfect as a phone tower for Mimosa and surrounding area. Or it could be upgraded to fulfil both roles.

Also an assessment should be done as to whether this is the best location when considering both the needs of the NBN and MNO's

I think it would be good if joint proposals could be encouraged or if the NBN could lease out their towers as phone towers. Also other possible users of the tower could be the Rural Fire Service, the NSW Ambulance service and NSW Police service.

Regarding question 21;

I do see a role for the Australian Mobile Telecommunications Association (or even the ACMA) in getting the MNO's and NBN Co together to best improve the geographical coverage of mobile phones. There should also be a formal place where citizens can complain of poor mobile phone service and expect something to be done about it.

When our Government phone services were deregulated and sold off there was a “universal service obligation” imposed on Telstra. This obligation should have included mobile phone services as now the only investment made by Telco’s is when it can be shown to be commercially viable and is not need based at all. During the 20th century a cable was delivered to every farm house in our area for fixed phone lines, with an exchange box not more than 5km’s away. Now in the 21<sup>st</sup> century when mobile phones are the norm in most places, we aren’t able to get a phone tower within 20kms. I think there is an important role for government, to cover these areas that may not be as financially rewarding to the Telco’s as the larger urban areas.

Yours truly

Stephen turner

Telstra mobile phone coverage map of Rannock, Mimosa and Bectric area

