Regional Mobile Issues Forum
28 February 2018

Summary report

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1.   Introduction

In late 2016, the ACCC commenced a public inquiry into whether to declare a domestic mobile roaming service. Regional communications were a central focus of the inquiry as mobile coverage and quality of services are vital issues for consumers and businesses in rural, regional and remote areas of Australia.

In October 2017, the ACCC concluded the inquiry. It decided not to declare a domestic mobile roaming service as it was not satisfied that doing so would promote the long-term interests of end-users. This is because the ACCC found that the competitive dynamics of the industry are such that mobile service providers differentiate themselves on what kinds of services and products they offer. Declaration would have potentially removed the incentives of mobile network operators (MNOs) to continue to compete on coverage and quality.

The inquiry attracted much interest from regional stakeholders, including consumers, businesses, representative groups and local governments. We received submissions that raised many issues relating to mobile services in regional areas, such as inadequate mobile coverage and lack of transparency in information regarding mobile coverage, quality and network investment. The ACCC released a separate paper *Measures to address regional mobile issues* at the end of the inquiry to discuss these issues and identified some regulatory and policy measures which could potentially address some of these issues. This paper is available on the ACCC website at:

www.accc.gov.au/regulated-infrastructure/communications/mobile-services/domestic-mobile-roaming-declaration-inquiry-2016/regional-mobile-issues-paper

1.1.   Purpose of the forum and attendees

Since releasing the paper, stakeholders have approached the ACCC seeking to be further involved in discussions around the implementation of the measures identified in the paper. While some of the measures identified are directly within the powers and functions of the ACCC, others are not and require ongoing engagement and collaboration with industry and other government agencies. Recognising this, the ACCC decided to hold a forum and invite all relevant stakeholders to discuss the issues and measures identified and to develop a collaborative approach to improving regional mobile services.

This report provides a summary record of the forum for participants and other interested parties. This document is not a verbatim record of the forum and the views and opinions expressed by the attendees may not reflect the ACCC's views or positions on the issues.

The ACCC is grateful for the attendance of all participants and would particularly like to thank those who travelled significant distances to attend the forum and the regional representatives who prepared and presented case studies highlighting the issues facing many regional Australians.

1.2.   Next steps

The discussion at the forum was a valuable opportunity to test the issues raised in the ACCC's *Measures to address regional mobile issues* paper. Participants also provided additional evidence in support of the measures and this will be used by the ACCC in implementing its proposed actions from the paper.

Regular updates on implementation can be found on the ACCC's website at the link provided above ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮
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2.   Regional Mobile Issues Forum

The Regional Mobile Issues Forum (the forum) was held at the QT Hotel in Canberra on 28 February 2018. Attendees included regional consumer and business groups, the Australian Communications and Media Authority (the ACMA), the mobile network operators (MNOs), NBN Co, industry and consumer representative groups and officials from relevant departments of federal, state and territory governments. A full list of stakeholder attendees are available at **Appendix A**.

The forum was conducted in three sessions. Session 1 examined the need for accurate, consistent and comparable information on mobile coverage, quality and investment for regional consumers and businesses and some of the obstacles encountered by MNOs when measuring coverage. Session 2 examined regulatory measures which could potentially reduce the cost of investing in mobile infrastructure and facilitate the deployment of mobile infrastructure in regional Australia. Session 3 examined the mobile network data required for regulators and policy makers for various policy and regulatory purposes.

The agenda for the forum is available at **Appendix B**.

2.1.   Introduction

The ACCC's Deputy Chair Delia Rickard gave an Acknowledgement of Country and welcomed attendees to the forum. Ms Rickard explained the ACCC's domestic mobile roaming declaration decision, the reasons for releasing the *Measures to address regional mobile issues* paper and the purpose of the forum.

Ms Rickard said that Commissioners were taken aback with the volume, passion and quality of submissions received from regional consumers, both individuals and businesses, and from representative groups during the roaming inquiry. Ms Rickard highlighted that we have clearly heard that mobile coverage, network quality and investment information issues continue to be incredibly important issue to regional Australians. She explained that we considered this was an opportune time to engage with a wide range of stakeholders to develop a collaborative approach to these issues, and encouraged attendees to take full advantage of the forum and participate in discussions.

2.2.   Session 1 – Spotlight on regional mobile issues

This session was divided into two parts. The purpose of the first part was to hear from regional representative groups on how mobile network coverage public information affects:

- the ability of a regional consumer to select a mobile phone service
- the operation of regional businesses and their own investment in infrastructure, and
- the safety of regional consumers.

The second part of the session invited perspectives from the MNOs on the challenges in providing mobile network information. This was followed by a discussion on how more accurate and comparable information could be developed for consumers and businesses.

2.2.1.   Perspectives from regional stakeholders

To highlight the practical impact that inadequate information on mobile coverage, quality and investment can have for regional consumers and businesses, the ACCC invited representatives from AgForce Queensland, Better Internet for Rural, Regional and Remote Australia (BIRRR), NSW Farmers and the Isolated Children's Parents' Association (ICPA) to

provide examples of how this affects their lives and businesses. These stakeholders also form part of the Regional, Rural and Remote Communications Coalition (RRRCC).

AgForce Queensland

Ms Kylie Stretton from AgForce Queensland emphasised that adequate telecommunications, including mobile communications, play an important role in families' lives in regional areas, delivering business, health and education needs as well as alleviating social and geographical isolation. Ms Stretton's family are cattle and egg producers. They also operate a livestock agency business and need to travel across large areas in order to run the business. She noted that her family relies on mobile networks for all communications needs at home and on the road. Ms Stretton raised a number of issues relating to mobile coverage from her family's experience:

- it is difficult to know the extent of mobile coverage because publicly available coverage maps are not always clear, user-friendly or reliable

- it is very costly to achieve connectivity as her family needed to acquire a number of services and invest in additional equipment, including basic car kits, Cel-Fi and Longreach modem. Total setup cost amounted to $4300 and monthly running cost is $540 with only 195GB of data allowance

- even then, the coverage achieved is not consistent or reliable and speed of internet is slow,

- services experience congestion issues during tourist seasons, and

- small cells are being deployed in remote areas where it might have been better to deploy full-sized towers to achieve wider coverage.

Better Internet for Rural, Regional and Remote Australia

Ms Stretton also provided perspectives from BIRRR,[1] highlighting a number of concerns associated with regional mobile telecommunications:

- A survey conducted by BIRRR in 2016 shows that:
    - 72 per cent of mobile broadband users had to purchase additional equipment at their own expense (between $1000 and $2000) to access reliable coverage,
    - 73 per cent of respondents do not have reliable mobile coverage at home, and
    - 42 per cent of Sky Muster users do not have mobile coverage,

- the use of illegal boosters impact the quality of mobile coverage in regional areas. There is a lack of information and therefore awareness on whether certain boosters are legal, or how to correctly use boosters,

- there is a lack of community consultation on where mobile infrastructure should be deployed to better target the needs of the communities,

- there is poor customer service when dealing with the service providers and a lack of understanding of the particular issues faced by regional consumers and businesses,

- there is a lack of consumer information on mobile coverage, and

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[1] BIRRR is a volunteer support, information, advisory and lobby group for things relating to 'bush telecommunications'. It currently has 10,500 members and troubleshoot around 100–200 individual cases per week. To date, BIRRR has had over 215,000 website hits over 2,500 Tweet and has done over 20,000 volunteer hours.

- mobile towers need longer battery backup in the event of outages.

Ms Stretton then presented a case study of a grain grower who experiences mobile coverage issues in the Riverina region of NSW. The presentation highlighted issues such as frequent phone drop outs and the difficulty of resolving coverage issues with the service provider because of the need to coordinate with others to prove that similar issues impact a number of users.

NSW Farmers

Ms Isabella McDougall from NSW Farmers noted that in regional areas, competition is a secondary concern as the primary concern is always coverage. Ms McDougall presented the case study of a farmer in Moree who operates a property of 10,000 hectares.

Ms McDougall explained that the farmer relies on the presence of a Vodafone Hutchison Australia (VHA) mobile tower on his farm and invested in a driverless tractor in order to improve productivity of his farming business. It transpired that the tower only provides coverage to half of the farm and he could only get intermittent coverage for the other half via a Telstra mobile tower located off the farm. This means that the farmer had to purchase services from both Telstra and VHA and switch SIM cards when moving from one part of the farm to the other. The result was loss of productivity and unreliable coverage. The farmer considers that his tractor is now 95 per cent unreliable due to coverage issues.

Ms McDougall emphasised that having reliable mobile coverage is crucial to enabling farmers to take up new technologies and improve productivity, which would contribute significantly to the economy.

Isolated Children's Parents' Association

Ms Wendy Hick, Federal President of the ICPA raised a range of issues in relation to mobile coverage, particularly on its impact on distance education.

Ms Hick noted that both voice and data services are immensely important for distance education which is the only schooling option for children whose families do not live near a school. These families go to great lengths to access services that allow their children to have continuous education. Ms Hick provided an example where, in order to enable her children to continue online lessons while they are on the road, the family would drive for hours to find a suitable spot with adequate coverage to access lessons and then sit on the side of the road to enable her children to attend their lessons.

Ms Hick also highlighted the common lack of understanding that basic communications services may not be accessible by families living in regional areas. She noted that distance education schools send SMS notifications to parents if their children do not participate in online classes, not realising that the parents would not be able to receive the SMS notifications unless they have mobile coverage. Ms Hick noted that this type of scenario underlines the fact that families in regional areas do not have the type of essential communications services that those living in cities or populated areas take for granted.

Ms Hick considered that there are increasingly new technologies and equipment that could enable families in regional areas to get better connectivity. However, there needs to be a one-stop shop that can provide families with information on these connectivity solutions as they are simply not aware of them.

Ms Hick then noted the cost of mobile services is an issue in regional areas. She commended Telstra's initiative in providing unmetered education content to 150 sites and hoped that this could continue and become available with other service providers.

Ms Hick also noted that inadequate mobile coverage could have serious safety implications in regional Australia. She provided an example where, in a one-teacher school in an isolated area, the teacher had to send a student down the road to get help when another student got hurt as she didn't have coverage to make a call for help. The teacher was unable to leave the school due to her duty of care to all the other students at the school. Further, having adequate and reliable mobile coverage is crucial in emergency evacuation situations for the purposes of communicating with residents and coordinating evacuation efforts.

Ms Hick also touched on the issue of illegal boosters mentioned in Ms Stretton's presentation earlier. Ms Hick noted that subsidies for legal boosters and assistance in helping people set them up is needed to alleviate the issue.

Finally, Ms Hick noted that there are concerns from regional consumers on the implications of the rollout of new generations of mobile technologies and shut down of previous ones. For instance, it is unclear for many families what needs to be done (such as what upgrades to technology need to be made) and what coverage will be available if 3G is shut down and as 4G and 5G is rolled out.

Comments from stakeholders on issues raised

Mr Giles Tanner, from the ACMA, responded on the issue of illegal boosters. He noted recent publicity about their use but observed that the ACMA has received very few direct complaints. The ACMA considers that Telstra, in particular, is effectively managing the problem and is informing the ACMA where necessary. However, Mr Tanner encouraged participants to contact the ACMA if they had concerns about boosters in a particular area. The ACMA has some reference material on its website on legal boosters or repeaters: https://www.acma.gov.au/theACMA/mobile-phone-repeaters-information-for-consumers.

Mr David Blundell from the Queensland Department of the Premier and Cabinet, commented that if the cost of legal boosters represents a barrier to consumers obtaining them, measures that improve the affordability of legal boosters could potentially address the problem. Ms Stretton agreed that a discount on antennas would make a difference and that spending $1000 – $2000 to boost coverage is not always an option for regional consumers.

2.2.2.   Perspectives from the mobile network operators

Representatives from the MNOs provided a short response to the issues raised in the presentations.

Mr Tim O'Leary, representing Telstra, said that the availability of information is a key issue and that Telstra will actively take on concerns regarding mobile coverage information. Mr O'Leary noted that Telstra could improve information on technology used to boost mobile coverage. He also acknowledged the great work of BIRRR and noted that more could be done to respond to consumer issues raised by BIRRR. Mr O'Leary said the need for investment in regional areas is more than ever before and that co-investment is proving to be an important part of the solution. He outlined Telstra's regional co-investment fund and its collaboration with several state governments to deliver better coverage, as well as Telstra's plans to extend its regional call centre. Mr O'Leary also emphasised the importance of technology innovation in delivering better coverage, for example, noting that Telstra's CAT M1 technology for narrowband Internet of Things applications, could deliver around 3 million square kilometres of coverage, which is larger than its 3G footprint. Mr O'Leary further noted the need for appropriate regulatory settings to promote competition and mobile investment.

Mr Iain Little, representing Telstra, acknowledged that more can be done to improve the provision of information to consumers on coverage. He explained that coverage maps are based on engineering models, which use data and algorithms to predict the level of

coverage across Australia. Mr Little noted that some input data is within the control of the MNOs, such as the type of spectrum and antenna used, but it is difficult to account for environmental factors in coverage maps, such as the types of trees in particular area which could impact on the ground experience. Having said that, he advised that Telstra is making some improvements to its coverage maps, such as adding information layers of indoor coverage, accounting for different devices used and including a three-month view on Telstra's investment.

Mr James Toole, representing Optus, also acknowledged the issues raised by regional representatives and noted that he would welcome reports from stakeholders on how better information could be useful to consumers. Optus considers that improving existing information is better than imposing new regulation. Mr Toole explained that currently Optus uses a software called Mapblaster to present its coverage maps, including current and upcoming coverage information, which should help businesses to make investment decisions. In addition, the My Optus app collects data relating to on the ground experience from subscribers' devices, which informs Optus on its future investment decisions. Mr Toole also noted that there is an active third party market on the provision of information on mobile coverage and quality of services, such as the mobile benchmark analysis conducted by P3. Nonetheless, Optus would be happy to work with the other MNOs to see what the industry could do to provide better information to consumers in regional and remote Australia.

Mr Tim McPhail, representing Vodafone Hutchison Australia (VHA), acknowledged the issues raised in the presentations and noted that VHA is keen to ensure there is consistent and comparable coverage information. Mr McPhail observed that while coverage maps are useful, they are based on desktop analysis and therefore not 100 per cent accurate. He mentioned that VHA provides information to the ACCC under the Infrastructure RKR in relation to its network infrastructure.[2] VHA does publish information on its network plans and planned investments can be seen on its coverage maps. However VHA considers that it would be impossible to provide 100 per cent accurate information on future investment because it would depend on various factors such as council approval, access to land, power and backhaul. VHA also noted its support for open access on towers and that co-building would be a positive requirement, however noted the need for improved regulatory settings.

Comments from stakeholders on the issues raised

Participants provided various comments on the main issues that would need to be solved and asked questions on what solutions may be possible.

It is clear from comments from participants that there is a need for more accurate and comparable coverage maps that inform consumers of the extent and quality of coverage of each of the MNOs' networks. Participants noted that this is important for consumers and businesses to make informed choices and investment decisions.

'Ground truthing' the information currently used in producing coverage maps, such as by incorporating information on actual coverage experience on the ground, was raised as one way in which the accuracy of the coverage information could be improved. Telstra noted that it currently receives information from customers on the ground, but noted the need to be careful with this information. Telstra explained that this is because customers' circumstances may differ and that this may impact their actual experience. For example, drop outs could be caused by temporary factors, such as a car and a truck passing each other. Optus noted potential privacy issues associated with using automatic tracking apps. Optus considers that the current engineering model already takes into account a significant amount of GIS (Geographic Information System) data, but it would be difficult to capture some factors that impact coverage quality, such as the growth of trees over time.

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[2]   This is further discussed in Session 3.

Mr Lachlann Paterson from the Department of Communications and the Arts (DoCA) observed that it is not currently possible to accurately compare the coverage maps of the three MNOs. DoCA noted that, based on the information it received from the MNOs for the purpose of the Mobile Black Spot Program (MBSP), the MNOs had very different assumptions underpinning the engineering models for their coverage maps. DoCA further noted that even if consumers have access to such information, they would lack the technical expertise to interpret the information. The need to provide more standardised information was echoed by other stakeholders, such as the Victorian Government officials, the Australian Communications Consumer Action Network (ACCAN) and Victorian Farmers Federation (VFF).

The ACCC queried whether the industry could develop standard metrics for the presentation of coverage information such that the MNOs' coverage maps could be easily and accurately compared. Telstra noted that the MNOs had not historically coordinated coverage metrics as each was trying to do different things in order to compete with each other. Telstra also noted that there are other sources of information available, such as the websites of the ACMA and AMTA, as well as comparator websites provided by third parties, such as http://www.mobilecoverage.com.au. In response, various stakeholders expressed concern about an expectation that consumers might have to seek out multiple sources of information rather than rely on their service provider to provide all relevant information necessary to an informed decision. This was acknowledged by Telstra.

Other desirable improvements in information provision raised by participants include:

- making clear the extent of coverage available with service provided with the mobile virtual network operators (MVNOs) and noting any restrictions compared to the MNOs' coverage,

- educating consumers and businesses on what the coverage maps mean and what they can expect based on coverage maps,

- making available a common set of information on what consumers can do to improve their experience, including information on the use of hardware such as Cel-Fi,

- educating consumers and businesses on the use of legal boosters/repeaters and how to properly set them up, and

- allowing consumers to experience actual coverage and quality of services before committing to longer term purchase, e.g. both VHA and Optus provide a network guarantee that allows consumers to cancel their contract within 30 days.

2.2.3.   Summary of findings from session 1

Improvements are needed in the provision of:

- accurate, comparable and reliable information on the quality and extent of mobile coverage,

- accessible information on the types of technology and hardware that could be used to enhance coverage experience,

- accessible information on illegal boosters and repeaters,

- accessible information on future investment, including the implications for the rollout and shutdown of different generations of technology, and

- a one-stop shop for all the relevant information necessary for consumers to make informed choices about services.

2.3. Session 2 – Mechanisms to extend regional mobile coverage

This session had a strong focus on the ACCC's own regulatory settings and whether they are providing incentives to promote efficient investment in regional mobile coverage. This was followed by some observations from representatives on how states and territory governments seek to provide incentives to carriers to extend regional mobile coverage.

Ms Tara Morice from the ACCC opened the session by noting the importance of ensuring that the ACCC's own regulatory settings continue to provide incentives for MNOs to invest in regional Australia. She explained the rationale for the ACCC's recent decision not to declare a domestic mobile roaming services and noted that a key consideration for the Commission was the risk of declaration removing incentives for MNOs to continue to compete on coverage and quality of coverage. She also noted that the ACCC will shortly commence two processes in which we will be looking at whether changes could be made to ensure that regulatory settings are promoting efficient investment in regional Australia.

2.3.1. Review of the Facilities Access Code

The ACCC will soon commence a review of the Facilities Access Code (the Code). The Code forms part of the facilities access regime and sets out the conditions to be complied with in the provision of access to certain telecommunications facilities.[3] Ms Morice noted the upcoming review is likely to examine a number of issues, including requirements for pre-build discussions, including a 'use it or lose it' provision, and the use of NBN infrastructure.

In discussing facilities access, participants at the forum mainly focused on the issue of pre-build discussions. ACCAN expressed the view that there needs to be a better approach to pre-build process to ensure fairness in the location and design of the new towers.

Both Optus and VHA expressed the view that co-location on brownfield sites generally work well. Optus noted that other MNOs co-locate on around 65 per cent of the sites owned and operated by Optus. On the other hand, Optus considered that a process to encourage a true co-build model is needed as there is practically no adequate process currently to share information on future planning on investment. VHA also expressed support for further co-build arrangements with other MNOs. Telstra noted that it is keen to ensure that the facilities access regime works, but did not provide specific comments on pre-build processes.

Participants also raised other issues relating to co-location. Ms Teresa Corbin from ACCAN noted that many consumers are not aware co-location already exists and more information on this would be useful. ACCAN also noted the feedback from consumers and communities indicate that there is delay in sorting out access to facilities and that the process could be streamlined to reduce delay.

Co-location on sites funded as part of the MBSP was also raised and there were mixed views on whether this process worked well. VHA noted that even though Telstra was required to build sites to accommodate one additional MNO for the sites it was building under Round 1 of the MBSP, the design of the sites were such that they would still not accommodate VHA's equipment. On the other hand, Optus noted that it was able to co-locate on all the sites it wanted to under the MBSP. The DoCA explained the different co-location requirements under the three rounds of the MBSP and there are so far 167 sites with co-location under the first two rounds.

Some participants also expressed the view that even with co-location, the incentives to invest in regional and remote areas will become increasingly limited. The National Farmers'

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[3]   These are specifically telecommunication transmission towers, sites of telecommunication transmission towers and underground facilities. For more details, please see Part 5 of Schedule 1 of the *Telecommunications Act 1997* (Cth).

Federation noted, in this respect, that as commercial incentives for the MNOs to keep investing becomes lower, we may start to see bespoke providers that develop specific connectivity solutions, for instance, for farms. Telstra, however, refuted that the investment cycle has reached its limit. It argued that the incentives to keep investing in expanding coverage are impacted by external factors, such as changing technology and declining equipment prices.

NBN Co commented that it was happy with the Code and co-location on its fixed wireless infrastructure is working well, however there is limitation on the use of NBN Co infrastructure as its fixed wireless footprint largely overlaps with the MNOs' coverage.

2.3.2. Declaration inquiry into the Domestic Transmission Capacity Service

Mr Grahame O'Leary from the ACCC provided a brief outline of the Domestic Transmission Capacity Service (DTCS) and why transmission services are important for the provision of mobile services, particularly in regional areas. He then introduced the upcoming declaration inquiry into the DTCS, noting that the review will examine all aspects of the service description and the types of routes that should be covered. It will also consider whether mobile backhaul should be considered a particular type of route for specific regulation.

ACCAN noted that the market for transmission services need to operate fairly and this is something that on which ACCAN would be keen to engage with the ACCC. ACCAN was interested in satellite backhaul and queried whether this would be considered as part of the declaration inquiry. It also noted that it would be useful to know what falls outside the DTCS and how the regulated price for the service impact the prices paid by consumers.

Optus reiterated its views on previous occasions that there is not only one transmission service, but there are different transmission services that serve distinct and non-substitutable markets. As such, Optus considered that that DTCS needs to be separated into different services that reflect the different uses in the downstream markets. The ACCC noted that we will look at this issue more closely as part of the examination of the service description in the inquiry.

2.3.3. State and territory government perspectives

In discussing the ACCC's own regulatory settings, the ACCC invited state and territory government officials to provide their perspectives on how state and territory policy makers seek to promote incentives to invest in regional mobile coverage and the challenges they faced.

Mr Matthew Dummett from the Victorian Department of Economic Development, Jobs, Transport and Resources noted the Victorian Regional Rail Connectivity Project as an example of a policy program that seeks to improve mobile coverage. The program was challenging and would not have worked if the MNOs did not collaborate. He considered that the key to making the subsidy programs work is to identify the gaps by gathering demand- and supply-side information and then tailor a solution addressing those gaps. He acknowledged that the MNOs' incentives to co-invest in these programs will reduce once the programs seek to target the more remote and sparsely populated areas.

2.3.4. Summary of findings from session 2

There is a need for better coverage and quality of mobile services in regional areas, through ongoing investments by the MNOs and governments.

The proposed review of regulatory mechanisms such as the DTCS and Facilities Access Code is timely and will explore changes to ensure that regulatory settings are promoting efficient investment in regional areas.

2.4.   Session 3 – Mobile network data for policy makers and regulators

The session examined types of mobile network data needed for governments to make policy decisions such as subsidy programs and invited perspectives from various government officials on their experiences on this issue. The session examined the ACCC's Infrastructure Record-Keeping Rules (RKR) and how it could be used to track investments in mobile infrastructure over time.

2.4.1.   Information needs of policy makers

Ms Clare O'Reilly from the ACCC invited government officials to provide their perspectives on the data needs for policy making and the challenges they faced in obtaining data.

Departmental officials at both federal and state level unanimously expressed the view that it is currently difficult to obtain the mobile network data needed for policy decisions, such as subsidy programs, and that better information provision is needed to improve the current situation.

Mr Dummett stressed the importance of availability of information on mobile and other communication technology. He explained that the Victorian government is currently partnering with nine communities to build digital plans, which would encompass information such as

- the types of connectivity available across the state,

- the government's own infrastructure and how the government could invest to benefit communities,

- what the demand and supply side characteristics are, and

- what types of businesses exist and what their needs are.

He considered this type of initiative to be an area that would need further collaboration with federal and state governments. Mr Dummett noted that a key challenge for the MNOs is how they could openly share information necessary for these types of policy exercises. He also added that while the government's need for information is more business, economic and policy focused, it is fully supportive of making available the right information for consumers as part of that process.

Mr Leonard Kary from the New South Wales' Department of Premier and Cabinet noted that the $1.3 billion Regional Growth Fund provides an opportunity for the state government to improve regional connectivity. He noted that to justify co-investment in regional communication infrastructure, the government would need accurate and useful information.

Mr Blundell also noted that the Queensland government hit the same hurdle when trying to gather information on mobile coverage, particularly from certain carriers. He noted that the Queensland government is willing to invest, but needs better information to identify areas of needs. He also noted that there is already geospatial information available on dwellings and highways, and if it is possible to overlay information on mobile coverage with these, this would help governments better prioritise funding.

Mr Paul Tzaikos, from the Western Australian Department of Primary Industries and Regional Development noted that there is currently restrictions on the use of the mobile network data that is available to the WA government.

Ms Maria Dalla-Fontana from the Tasmanian Department of State Growth noted that the federal Department of Communications used to collect data on mobile coverage and network information a decade ago which was available for the state and territory governments. She considered that the MNOs should view the sharing of data as a growth opportunity, as combining the data with the objectives that the state governments are hoping to achieve, it could potentially change the business case for the MNOs' investments.

The DoCA echoed the views expressed by state and territory government officials and noted that it was required to ask for nominations for sites under the MBSP because it did not have the necessary information to identify areas of needs.

The ACCC noted that some MNOs may be reluctant to share information on the basis that they are commercially sensitive, but queried why the information on existing mobile infrastructure and coverage would be considered commercially sensitive.

Telstra noted that this type of information could potentially reveal Telstra's overall strategy in competing in the market. Optus argued that there is a huge amount of granularity in the data available, but it is unclear whether they be useful for policy makers or consumers. Optus also noted that there may be security issues with releasing the locations of towers at some detail.

However, the MNOs acknowledged the issues raised by the government officials and committed to engage with state and territory governments on their information needs.

Regional and consumer representatives also provided feedback on engagement with communities in relation to government policies such as subsidy programs.

ACCAN considered that program designs need to account for how communities can put themselves forward for funding, noting that while some communities are capable of advocating for themselves, others are not. ACCAN provided an example where the visibility of the MBSP has increased since the first two rounds, but the database for nominating black spot sites has closed, making it impossible for communities that became aware of the program to participate in nomination.

NSW Farmers noted that $50 million of the NSW government's Regional Growth Fund will go to improving regional telecommunications. However, its members have been finding it difficult to put forward sufficient cases to attract funding because of the lack of data available to them. NSW Farmers considered that policy makers have to acknowledge that regional consumers and businesses only have limited information available to them.

2.4.2.   ACCC Infrastructure Record-Keeping Rules

Ms O'Reilly noted that the Infrastructure RKR requires infrastructure owners, including the MNOs, to report various information on the infrastructure they own and operate each year. She explained that as a proposed action in the *Measures to address regional mobile issues* paper, the ACCC amended the Infrastructure RKR in December 2017. The MNOs are now required to record and report additional information on mobile infrastructure. This is to provide greater consistency of information, transparency and accountability over the investment commitment and coverage claims by the MNOs.

The ACCC acknowledged that the information reported under the RKR would be of interest to policy makers and the public in general, but noted that there is limitation as to how the ACCC could share this information. The ACCC could explore whether a high-level report,

akin to the NBN Wholesale Market Indicators Report, which utilises information reported under the NBN Services in operation RKR would be useful.

Optus noted that it uses the media extensively to provide transparency over the progress of its investments over time. NSW Farmers responded that the MNOs may be using their social media outlets at a local level, and there needs to be a greater obligation to inform consumers than just media.

ACCAN noted that it uses the high level data from NBN Wholesale Market Indicators Report and that a similar report on the level of investment on mobile coverage and the status of things would be useful. ACCAN also noted that it uses websites such as Oz Towers extensively but it is unclear who put together the information together. ACCAN considered that it would be helpful if this type of information is collated and published by a trusted organisation.

2.4.3. Summary of findings from session 3

There is a need for more accessible, accurate and complete information for regulators and policy makers at both federal and state and territory levels, for the purposes of regulatory and policy decision making.

3.   Summary of outcomes and next steps

Issues	Findings	Outcome and next steps
Information for consumers and business	There is a need for: • more accurate, comparable and reliable information on the quality and extent of mobile coverage • more accessible information on the types of technology and hardware that could be used to improve actual experience • more accessible information on illegal boosters and repeaters • more accessible information on future investment, including the implications for the rollout and shut down of different generations of technology, and a one-stop shop for all the relevant information necessary for consumers to make informed choices.	*Industry* The MNOs acknowledged the issues and individually committed to improving information provision to consumers. They also committed to discussing with each other measures to improve comparability of coverage and quality of different networks. *ACCC* The ACCC will shortly write to the MNOs and industry groups to discuss how we could collaboratively develop solutions to improve information provision. The ACCC will undertake investigations where necessary if the provision of information by industry raises issues under the Australian Consumer Law.
Mechanisms to extend mobile coverage	There is a need for better coverage and quality of mobile services in regional areas, through ongoing investments by the MNOs and governments. Regulatory mechanisms could be reviewed to explore changes that could promote incentives for ongoing investments in regional areas.	*Governments* State and territory government officials noted planned programs to improve mobile communications, while noting that issues around obtaining data from MNOs need to be addressed. *ACCC* On 5 March 2018, the ACCC commenced an inquiry to review the declaration of the DTCS. The ACCC will shortly commence a review of the Facilities Access Code.
Information for regulators and policy makers	There is a need for more accessible, accurate and complete information for regulators and policy makers, at both federal and state and territory levels, for the purposes of regulatory and policy decision making.	*Industry* The MNOs acknowledged the issues raised and committed to engage with state and territory governments with regard to their data needs. *ACCC* The ACCC will explore whether information provided under the Infrastructure RKR could be reported at a high level for the benefit of policy makers and the public in general.

Appendix A

Regional mobile issues forum Attendees QT Hotel, Canberra, 28 February 2018	
Organisation	**Name**
Australian Communications Consumer Action Network	Teresa Corbin Una Lawrence Johanna Plante Jeremy Riddle
Australian Competition and Consumer Commission	Delia Rickard Roger Featherston Michael Cosgrave Clare O'Reilly Tara Morice Sarah O'Brien Grahame O'Leary Brendan Staun Chris Xie
Australian Communications and Media Authority	Giles Tanner Nevio Marinelli
ACT Government, Chief Minister, Treasury and Economic Development Directorate	Andrew McCredie
AgForce Queensland and Better Internet for Rural, Regional and Remote Australia	Kylie Stretton
Australian Mobile Telecommunications Association	Lisa Brown
Axicom	Stefan Kennedy Betty Katsinas
Broadband for the Bush Alliance	Marianne St Clair David Murtagh
Communications Alliance	Jessica Curtis
Country Women's Association	Dorothy Coombe
Department of Communications and the Arts	Chris Drew Isabella Gorrez Leonie Holloway Paul Hyland

	Philip Mason
	Lachlann Paterson
	Daniel Tangri
	Richard Windeyer
Isolated Children's Parents' Association	Wendy Hick
National Farmers' Federation	Mark Harvey-Sutton
	Corinne Dooley
NBN Co	Duncan Giles
	PaoYi Tan
NSW Farmers	Isabella McDougall
NSW Government, Department of Premier and Cabinet	Leonard Kary
Northern Territory Government, Department of Corporate and Information Services	Doug Cooke
Office of Senator the Hon Bridget McKenzie, Deputy Leader of the Nationals and Minister for Regional Communications	Lachlan Hunter
Office of Stephen Jones MP, Shadow Minister for Regional Communications	Jane Mulligan
Optus	Luke Van Hooft
	James Toole
Queensland Government, Chief Information Office, Department of the Premier and Cabinet	David Blundell
South Australian Government, Department of State Development	Peter Triantafilou
Tasmanian State Government, Department of State Growth	Maria Dalla-Fontana
Telstra	Iain Little
	Tim O'Leary
	Bob Theunissen
	Kate Nichols
Vodafone Hutchison Australia	Tim McPhail
Victorian Government, Department of Economic Development, Jobs, Transport and Resources	Matthew Dummett
	Paul Paterson
West Australian Government, Department of Primary Industries and Regional Development	Paul Tzaikos
Victorian Farmers Federation	Brett Hosking (by teleconference)

Appendix B

Regional mobile issues forum Agenda QT Hotel, Canberra, 28 February 2018		
Time	**Topic**	**Chair**
09:00 – 09:30	**Registration, tea and coffee**	
09:30 – 09:35	**Welcome**	Commissioner Delia Rickard
09:35 – 09:45	**Introduction to the forum** This brief session will outline the purpose of the forum, the ACCC's role and desired outcomes.	Clare O'Reilly
09:45 – 10:30	**Session 1: Spotlight on regional mobile issues** During this session, we will hear the perspectives of regional stakeholders regarding the need for accurate and consistent mobile coverage, network and investment information for regional consumers and businesses. Presentations will be provided by several regional consumer and business groups.	Clare O'Reilly
Morning Tea (half hour)		
11:00 – 12:30	**Session 1 continued: Spotlight on regional mobile issues** During this session, we will discuss measures that can improve consumer information issues discussed in the earlier session. We will hear the perspectives of mobile network operators. Issues include: • Availability of transparent and accurate coverage maps • Improved coverage and quality information • Comparability of network maps from different operators. We will also discuss how transparency around future network deployments and investments can be achieved.	Tara Morice
Lunch Break (one hour)		

13:30 – 14:30	**Session 2: Mechanisms to extend regional mobile coverage** This session will explore mechanisms which may assist in reducing the cost of investing in mobile infrastructure and ensuring that regulatory settings are providing incentives to invest in regional mobile coverage. We will hear from state and territory government representatives on the challenges they face in providing incentives to extend mobile coverage. We will also discuss the ACCC's regulatory settings and whether they provide appropriate incentives to invest in regional mobile coverage. This includes the ACCC's: • recent mobile roaming declaration inquiry • forthcoming review of the Facilities Access Code, and • forthcoming declaration inquiry into the Domestic Transmission Capacity Service.	Tara Morice
	Afternoon Tea (half hour)	
15:00 – 15:45	**Session 3: Mobile networks data for policy makers and regulators** Accurate mobile network data is needed for a number of regulatory and policy reasons. This session will discuss data needs for various policy and regulatory purposes including: • The ACCC's infrastructure record-keeping rule and the purposes for which this data is collected, • The availability of network data for policy programs such as mobile coverage programs, and • planning and infrastructure decisions. We will hear from participants regarding issues surrounding the availability of network data.	Clare O'Reilly
15:45 – 16:00	**Concluding remarks and next steps** This brief session will offer concluding remarks, a wrap-up of issues discussed at the forum and an indication of issues to be further explored by attendees.	Clare O'Reilly
	Close of forum	