



bai communications

3 November 2020

[MBSPRound5@communications.gov.au](mailto:MBSPRound5@communications.gov.au)

Dear Sir / Madam,

BAI SUBMISSION TO THE AUSTRALIAN FEDERAL GOVERNMENT CONSULTATION:  
Mobile Black Spot Program – Draft Round 5A Guidelines

BAI Communications Australia (BAI) welcomes the opportunity to provide input to the Federal Government on the Mobile Black Spot Program (MBSP) – Draft Round 5a Guidelines.

BAI Communications is a neutral host communications service provider in Australia, USA and Canada, and provider of communications services in Hong Kong. In Australia, BAI provides managed services and portal services to broadcasters as well as site access arrangements to telecommunications and radiocommunications operators. BAI also operates and maintains the Government Radio Network (GRN) for the NSW Government. In the USA and Canada, BAI Communications companies provide neutral host communications services within the New York City and Toronto subway systems as well as telecommunications, Wi-Fi, and emergency services communications.

As stated in our response to the MBSP Round 5A consultation paper, BAI welcomes the support in the draft guidelines for the sharing of infrastructure and services as a key part of the Mobile Black Spot Program. BAI believes this has multiple benefits for regional communities across the country, namely:

- The sharing of mobile services enables the roll out of infrastructure to regional areas that were previously not economic even with simple site sharing.
- The sharing of services automatically brings competition and choice to regional areas covered by the program.
- Competition and choice are essential to incent operators to upgrade regional services and ensure these communities are not left behind the metro communities in the future.

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Also, BAI believes that the Draft Round 5A Guidelines address the specific concerns that we outlined in our response to the consultation paper, namely

1. Grant Amount: BAI strongly supports the introduction of the Cluster Mobile Coverage Solution in section 3, as this will aid the provision of continuous mobile coverage which is particularly important for key transport corridor solutions. However, BAI would suggest that the maximum number of base stations in a clustered solution be extended from ten to fifteen given the difficult terrain and inherent coverage issues for many of these potential regional solutions. For example, both the Blue Mountains and Illawarra lines have multiple tunnels in relatively short distance intervals that require a high number of base stations for continuous coverage. BAI also strongly supports the Draft Round 5A Guidelines removal of the funding cap on solutions for two or more MNOs (section 3.1.3) as we believe this will significantly encourage shared solutions that bring both coverage and choice to key regional areas and transport corridors.
2. Eligibility Criteria: BAI welcomes the suggested approach outlined in section 4.1.3 for the granting of funding to MNIPs. This approach will enable MNIPs to progress with commercial negotiations with MNOs more effectively for the delivery of mobile services and fully addresses BAI's previous concerns on this issue.
3. Evaluation Criteria: BAI strongly supports the new draft assessment criteria in section 6. We believe these new criteria will significantly encourage the establishment of shared infrastructure in new coverage areas, particularly along key transport corridors, that brings choice in mobile services to the public. The draft guidelines fully address BAI's previous concerns on this issue.
4. Trial Solutions: BAI is very supportive of the introduction of the trial category and separate funding. The flexibility on the operational period for the trial (section 3.5.3) and the more general merit criteria are very appropriate and will encourage the introduction of innovative solutions for regional and transport corridor mobile coverage solutions.

BAI is appreciative of the detailed thought the government has given the new draft guidelines and believes they will significantly enhance the outcomes of future rounds of MBSP funding.

Kind Regards



Stephen Farrugia  
Chief Technology Officer  
BAI Communications Australia