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Department of Infrastructure, Transport,
Regional Development and Communications
Via MBSPRound5@communications.gov.au

Public Submission - Round 5A Mobile Blackspot Program (MBSP)

The Curraweela community supports the Key Design Principles proposed for Round 5A of the MBSP. We provide comments below with the aim of further enhancing the program design.

By way of background, the Curraweela district is located between the towns of Taralga and Oberon NSW on Main Road 256, which is commonly known as the Goulburn/Oberon Road. It is a major inland transport route linking the Central Tablelands districts of Oberon, Bathurst and Orange to Goulburn, the Hume and Federal Highways. Main Road 256 is seen as a future bypass of Sydney. There is already a high level of use by transport companies travelling from northern NSW opting to avoid the traffic congestion in Sydney.

The Curraweela district is prone to bush fires, floods, snow and a high level of breakdowns and accidents resulting in injuries and fatalities. There are some 20 kms of no handheld mobile signal coverage for commuters and approximately 300 permanent residents and businesses. This number can grow to 1,000 on weekends and holiday periods.

The ageing Telstra land line infrastructure is proving to be unreliable, particularly when there are severe weather events, resulting in many residents without communications for extended periods.

Whenever an emergency occurs, commuters seek assistance from residents who are the first responders on the scene. Residents are unable to call for emergency services using mobile phones and must return to their properties to make calls on their landlines, often leaving the injured on their own. This significantly impairs the outcomes for individuals as emergency services require information and updates on the incident. The provision of mobile phone signal would facilitate timely on scene information provision. It would also allow emergency services to provide instruction to residents on what action to take as the situation develops. This is particularly important in medical situations.

In December 2019 to February 2020, the Curraweela district was under severe threat of the Green Wattle Creek bushfire, only some 8kms away. The residents of Curraweela were told the only way to alert them to evacuate was via mobile phone emergency alerts. Given there is no mobile signal in Curraweela, the community had no way of being alerted of the approaching fires. Many of the community felt the need to evacuate their properties and to seek shelter in Goulburn or at friends and relatives houses outside of the bush fire threatened district. Other families in the community slept in shifts requiring at least one family member to monitor the fire situation.

It is for these reasons and many other that the Curraweela Community supports the release of Round 5A and a change in the program design.

In relation to the Key Design Principles:

- 1. Delivering coverage benefits for non-commercial regional and remote areas.** We fully support the application of funding towards the three components A, B & C as detailed in the discussion paper. Rounds 4 & 5 favoured small cell transmitters solutions for tourist locations. Whilst this is beneficial for those small tourist locations, the program overlooked larger concentrations of residents and major transport corridors which require macro cell transmitters. We believe the focus of the program should shift towards towers that can provide benefit for communities spread over a larger area and for commuters that travel along major transport routes. Communities that are prone to natural disaster should be a mandatory element in all future rounds.

We believe that components A & C could be expanded to include essential communications for accidents, breakdowns, injuries, tracking/tracing mobile signal for persons and/or vehicles lost in bushland. It should further include the ability to download and activate the Federal Governments COVID-19 APP and other emergency alert communications and the ability to monitor situations on the internet as they develop eg: NSW Fires Near Me.

In relation to component B, there should be recognition that businesses operating within lower population densities are significantly disadvantaged due to the lack of mobile phone signal. They cannot take or receive mobile phone calls, nor can they retrieve messages until they travel to an area of coverage. This results in lost business opportunities.

Many technologies like internet banking and My Gov require authentication which is often facilitated by providing a secure code message via a mobile phone. The residents and business are unable to utilise this technology and many of the recently released technologies.

We believe the **Endorsement** section should be expanded to include the Federal Member for the district.

- 2. Promoting competition outcomes.** We fully support the co-sharing of funded towers by the MNOs recognising that there isn't a monopoly in the mobile phone signal market. It is particularly important for transport vehicles and commuters to obtain signal from their current provider. Whilst we are not familiar with the particular technology involved, we believe that funded towers should also facilitate the hosting of district based wireless internet services.
- 3. Funding is available for the capital costs of proposed solutions.** We believe the current Commonwealth funding cap should be removed and funding provided without an expectation for MNOs to provide a substantial financial contribution. The current model results in the MNOs prioritising on the basis of a Return on Investment model. The current model disadvantages any communities or major transport routes that are not perceived to make favourable economic returns to the MNOs. In Round 5A and future rounds of the MBSP, we believe that the government should recognise the benefit of coverage based on a weighted rating of priorities, rather than the MNOs opting whether or not to make an application on the basis of return on their investment.
- 4. Funding is available for mobile network operators, and for mobile infrastructure providers with priority given to solutions offering services from at least two mobile service operators.** Whilst there is benefit in having multiple mobile network providers in a particular location, we do not believe that priority should be given to multiple service providers for a solution. Priority should be given to locations that do not have handheld mobile signal, whether one or many MNOs are involved.
- 5. Support for state government and third-party contributions.** Whilst it is beneficial to have co-contributions from other parties, it should not influence funding outcomes for a particular location. A merit-based assessment of a particular location should not be influenced by third party financial contributions. In previous rounds, there have been some locations that have benefited from third

party contributions, but which appear to have questionable motives. We are of the view that senior individuals working for those third-party organisations may have had personal gain in mind, by way of increased mobile signal in their home location as a motive for making the contribution. Public monies should never be used for personal gain and the way to eliminate this is to remove any preference for third-party contributions from the priority rating process.

6. **Mobile Services need to be provided for a minimum period after Asset Completion.** We believe that coverage should continue to be provided on the former technology until equal coverage can be guaranteed under the newer technology. If the Government adopts a newer technology, coverage under the former technology should be maintained for a minimum of 2 years allowing users to make the transition and to upgrade their equipment.
7. **Other design principles.** Whilst 12 hour battery back-up seems reasonable, we believe that 24 hour or longer backup should be the minimum recognising that not all outages, particularly in rural communities can be fixed within 12 hours. Areas that are prone to weather events, wind, snow, extreme winds and torrential rain often experience power outages in excess of 12 hours.

In relation to the **Proposed Assessment Criteria**

Criterion 1 – New coverage outcomes

A community making a submission will not have the expertise to provide coverage maps, only the MNOs have the ability to make these predictions. There should be recognition that when an MNO provides predicted coverage, it is not a precise prediction and that weather and other factors will affect signal spread. Rather than rely on predicted coverage maps, we believe a better assessment would be a shift to the number of users that would benefit from the provision of mobile signal. The community can provide information on distances of no handheld mobile signal along major transport routes, number of residents & businesses and an estimate of the number of commuters and types of commuters. We believe this may be a better indicator of “new coverage” outcomes rather than a projected signal map which has many limitations. In the past, some of the funded towers have provided coverage to what appears large areas on a map, but some of those areas have extremely low populations and are surrounded by inaccessible bushland. Another recently funded tower in the district provides signal to less than 120 properties, many of which are unoccupied. There are no main roads within the reach of this tower. A shaded area of predicted coverage does not reflect user benefit outcomes.

Criterion 2 – Coverage benefit

The formula used to calculate coverage benefit has not been provided for evaluation, so it is difficult to make comment. In saying that, we believe the formula should be influenced by the points raised above, number of residents, businesses and estimate numbers and types of commuters. There should also be a factor applied to the different types of natural disasters experienced by a community. These factors could be weighted according to their priority.

Criterion 3 – Overall value for money

We generally agree with the overall value for money assessment, but reiterate that coverage maps are not an indicator of value for money. The number of residents, the number of travellers on a transport route, whether that route is recognised as a “Main Road” and whether the district is prone to natural disasters, accidents, injuries and fatalities are far better indicators of value for money.

We thank you for the opportunity to contribute to the development of the design phase for Round 5A and future rounds of the MBSP. We fully support the expansion of policy objectives to cover communities that have been declined in previous rounds. There is a great need to provide mobile phone signal to small

communities who are prone to natural disasters. These same communities are experiencing greater unreliability of land line communication, particularly in extreme natural disaster events leaving them without any communication ability for prolonged periods. Residents in these communities are the first responders in emergency situations and find themselves having to travel back and forth from their properties to make calls for assistance. They are unable to stay at the scene and take instruction from emergency services, nor can they provide updated information back to the emergency services. This has a major impact on the accident / emergency victim outcome.

Local business growth and expansion is also hindered due to lack of mobile signal. Local accommodation providers report that guests are asking whether mobile signal is available and a significant portion will not continue with the booking when they are advised there is no mobile signal available. Other businesses opportunities are lost as the business operators may go several days before returning to an area with mobile signal to retrieve messages. By that stage, potential customers have moved to another business within signal range.

Whilst the world is rapidly moving forward, developing mobile phone technologies eg: Emergency Alerts, Authentications, COVID19 App, School online App etc, our communities are crippled and being left behind in the past.

We welcome the release Round 5A and hope the comments above will influence the program design for 5A and for all future rounds of the MBSP.

Yours faithfully,

Frank Startari on behalf of the Curraweela Residents Group