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To whom it may concern,

**Submission on the Mobile Black Spot discussion paper**

I write on behalf of the District Council of Orroroo Carrieton in response to the call for submissions of the design of round 5A of the Mobile Black Spot Program.

The District Council of Orroroo Carrieton is located in the mid north of South Australia, approximately 3 hours drive north of Adelaide and one hour east of Port Augusta and intersects two major road transport routes from the eastern states in Australia and Northern Territory and Western Australia.

The primary commerce in the region is agriculture, with the predominant commodity being food (cereal grains, legumes, meat) and wool. Situated at the base of the Flinders Ranges the area retains much of its 1880's charm and is also a popular tourism destination.

Communities of the Orroroo Carrieton district, like numerous others in the State, are all too familiar with the social and economic disadvantage caused by significant and ongoing black spot and poor coverage issues. These coverage issues compound those issues common in rural and remote areas such as diminishing health services, sparse and ageing populations and geographical disadvantage.

Council considered the discussion paper at the meeting held 27<sup>th</sup> May 2020 and wish to provide the feedback contained herein for your consideration following the consultation.

1. Council are supportive of reserved funding for solutions to coverage issues in remote and very remote areas. Council note the success of this approach in rounds one and two of the Mobile Black Spot program which delivered solutions in less populated and higher cost areas.

However, the District Council of Orroroo Carrieton is disadvantaged by the classification given to the district by the Australian Statistical Geography Standard (ASGS). The ASGS allocates one of seven remoteness categories to an area (major cities, inner regional, outer regional, remote, very remote, migratory-offshore-shipping, and no usual address), based on its distance from a range of population centres.

Under the ASGS the Orroroo Carrieton district is allocated a category of "outer regional". Given the district is in fact more than 257kms North of Adelaide (by road 3+ hours), the classification of "outer regional" misrepresents the true characteristics and issues of remoteness in the district. To this end, issues of telecommunication standards in the district should be considered through a "remote" classification, not that of "outer regional" which is more suited to districts in the lower north of SA which are more accessible to services and amenity of the capital city.

2. The extent and severity of black spots should be considered. For example, Price Maurice Road is a high standard rural arterial road between Orroroo and Laura. The road is a key freight route, particularly for grain to Gladstone (the regional grain handling facility). It has also become more important as a social route for sport, medical services and families. Tourist numbers using the passage to access Orroroo and through to the Flinders Ranges are also increasing.

Unfortunately, a 30 kilometre section of the road connecting Orroroo and Tarcowie is entirely without mobile coverage, irrespective of one's chosen telecommunications provider. The Pekina, Black Rock and Tarcowie communities residing in the area are significantly disadvantaged with poor or no mobile coverage. The economic impacts of connectivity are felt by the 35 - 40 active primary producers in the affected area.

Council has previously raised the serious risk to public safety in an emergency of this particular example for Federal and State counterparts. Unfortunately, in early 2020 an elderly resident suffered serious injury in her Pekina home and was unable to call for help (by phone or call alert button) due to the lack of mobile coverage, and landline outage which is a common occurrence in the area. The elderly resident survived, although lay immobile for more than 18 hours before she was found. The risk of examples such as this should be prioritised with a view to providing solutions as quickly as possible.

3. Council commends a joint approach of Federal and State Governments in providing telecommunication solutions in rural and remote areas. However, Council wishes to emphasise how a third party co-contribution model can disadvantage rural and remote communities who should indeed hold priority, but lack the critical mass to generate a financial contribution to remain competitive. Council urges the Australian Government to give special consideration to addressing the real priority of communities like Pekina, Black Rock and Tarcowie and other communities in similar circumstances. This could be achieved through an “exceptional circumstances” criteria where communities can seek to justify existing telecommunications priority needs against an ability or inability to raise required co-contributions.
4. Council welcome the provision in round 5A to encourage solutions that deliver coverage both along the transport route and to community in the corridor. This is particularly important in rural and remote areas where the population is hugely dispersed. Small communities, like Yatina or Morchard (also in our Council district), located on transport routes who survive without services and amenity are often overlooked for areas of more strategic priority. They do however, serve as important community social hubs and in most cases rest-stops for passing traffic.
5. The decommissioning of the 3G network will be detrimental to rural and remote areas. The section of RM Williams Way (B80) north of Orroroo to Hawker is a regionally and nationally significant freight route. A key link to the Flinders Ranges it also experiences significant tourist traffic. The average traffic volume on this section of B80 is 230 cars per day (figure provided by the SA Department of Planning, Transport and Infrastructure). Although black spots do exist, the 112km stretch of road is currently up to 85% covered by the 3G network. Telstra is the only provider through which coverage is available on this stretch. When the planned decommissioning of 3G occurs in mid-2024, the 4G network will cover less than 40% of the highway. Without improvements to the network a stretch of highway B80 of more than 50kms will be without any form of network coverage. As 5G infrastructure projects emerge, equal focus should be applied to the improved stability and coverage of the 4G network in regional and remote of Australia.
6. Council supports the priority given to solutions offering services from at least two mobile network operators to provide consumers with competitive options. However, priority should be maintained in those areas requiring a baseline solution for network coverage. In so far as a project offering two or more mobile network operators in an area of lesser need should not be prioritised at the sake of an area without any level of network coverage with greater

need. For example, there is no current mobile network coverage in the Pekina Valley which poses significant risk to the community. In this instance, a solution offering a baseline level of network coverage should be pursued as the immediate priority, regardless of the number of mobile network operators involved.

7. Council notes that it is proposed round 5A will target transport corridors defined in the roads of Strategic Importance initiative and National Land Transport Network, which identify significant transport corridors that deliver economic and social benefits. Council's in South Australia invest heavily in the assessment and recording of road use and conditions. Positioned at the "coal face" Councils are often the most current informed authority with regard to the realities of road usage, emerging trends and associated issues in their respective district. This knowledge and data is readily available online in regional transport plans prepared collaboratively across local government regions. These regional plans and the Council's which inform them would be a valuable reference point for assessors of transport routes in the upcoming rounds to "ground-truth" their desktop assessments.

Council appreciates the opportunity to provide comment on the future rounds of the Mobile Black Spot program and looks forward to working collaboratively across government to provide telecommunication solutions in our rural and remote communities.

Yours sincerely,



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Chief Executive Officer

Cc: The Hon Mark Coulton MP  
Minister for Regional Health, Regional Communications and Local Government  
The Hon Tim Whetstone MP  
South Australian Minister for Primary Industries and Regional Development