Our Ref:#6361618

29 April 2020

Department of Infrastructure, Transport, Regional Development and Communications
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600
Via: MBSPRound5@communications.gov.au

Dear Minister

Mobile Black Spot Program – Round 5A Discussion paper.

Thank you for the opportunity to provide comment on the proposed round 5A Mobile Black Spot Program.

The Far North Queensland Regional Organisation of Councils (FNQROC) was established in the 1980's and represents 13 member councils in far north Queensland. The FNQROC region is the largest and fastest growing region in Northern Australia. It extends over 320,000 square kilometres with a population of approximately 278,000 and a gross regional product (GRP) of $16.33 billion (pre COVID-19).

The thirteen councils have collectively focussed on five key areas; Transport networks, Respecting our environment, Water and Electricity equity, Social infrastructure equity and equitable communication.

We have recently engaged a consultant to undertake an 'on ground' audit of our mobile blackspots (3G and 4G) across our heavy vehicle and tourism routes (5,100km at 50m intervals) and it was found that almost 70% of this network was in a blackspot. We have attached this spatial data to this submission. We were very pleased to see the key design points within the discussion paper.

Please find below our submission to the questions raised.

Question 1 – Are there any comments on the coverage areas proposed to be targeted?
FNQROC is very pleased to see the coverage areas proposed.

Question 2 – Are there any comments on the types of proposals that would be eligible for funding, including the required coverage outcomes?
FNQROC welcomes the types and required coverage outcomes within the discussion paper. The only issue may be related to the timing of the release and closure date for round 5A and

the ability to identify innovative solution types. (It is not our area of expertise, perhaps MNOs already have these ideas).

Question 3 – Is the RAN model an effective sharing model for Australia?

Not having a thorough understanding of the pros and cons of the RAN model we can't confidently answer this question.

Question 4 – What other design options could be considered that provide multi-provider outcomes?

Again, we do not have the knowledge or experience to be able to answer this question.

Question 5 – Are there any comments on the funding cap for Round 5A and eligible costs?

FNQROC has no comments on this.

Question 6 – Are there any comments that you wish to make in relation to eligibility to apply for funding?

We support co-location however please do not let this be the difference between a blackspot being funded or not in these remote locations. Being in Far North Queensland with the Gulf of Carpentaria and Cape York Peninsula we have some of the remotest areas of Australia and are likely to be the least commercially viable so co-locating MNOs may not be an option. I'm also not sure if you are able to co-locate if the solution is a small cell.

Question 7 – Are there any comments that you wish to make regarding ways the program could assist potential state government and third party co-contributors?

Both the State and Federal Governments have staff out visiting these areas on a regular basis, generally by car, this program assists in the workplace health and safety of these employees with greater mobile coverage.

All levels will also benefit with the drive tourism market. With increased mobile connectivity the feeling of safety will increase as will social media coverage of these beautiful areas. This type of marketing is priceless.

Question 8 – Are there any comments regarding the need for a shorter minimum operational period, particularly in remote and very remote areas?

FNQROC would argue the minimum 10 year operational period should remain. The areas targeted are generally the most uncommercially viable, if the period is shorter it is likely the MNO will walk away after this time.

Question 9 – Are there any comments on the proposed equivalency requirement and 4G reference power levels for handheld and external antenna coverage?

3G phones are no longer being sold and Telstra advises it will turn off its 3G in June 2024, 4G, 4GX and 5G are the current services, technology solutions are also rapidly changing so they should be able to upgrade to another solution during this time. It should be a requirement that during the operational period if services are turned off (like 3G) they are required to upgrade the solution to maintain operational usage.

External antenna coverage should be removed as it is only locals (and not all locals) who have this. If we are to encourage a drive tourism market we need to make them feel safe, they will only have handheld devices. Many who drive these road networks only have handheld devices.

Question 10 – What criteria should be used to identify key sites where independent power systems or redundant backhaul could be funded?
Support from the District Disaster Management Group could be a criteria as they are the ones who understand the shortfalls or issues during and post an event.

Question 11 – Are there any comments regarding the requirement for at least 12 hours of auxiliary backup power for small cells?

If the objective of providing coverage is to assist communication via mobile phone during or post an event any amount of auxiliary power is beneficial. 12 hours maybe enough to get initial reports or first contact in however it could be days before power is restored to small cells which means those areas are no better than what they are now. Anything is better than nothing at all.

Question 12 – Do you have nave any comments on the proposed assessment criteria?

Criterion 1 – "Provide new coverage outcomes to non-Major Urban areas" to be eligible for funding. When looking at the three priority areas; High priority natural disaster prone areas, Areas where low population densities have discouraged applications, and major regional and remote transport corridors these areas are not classified as 'urban' areas. Much of the area you are focussed on has significantly large stations and you may only have one or two (if any) residential properties over 100km or more. Perhaps Criterion 1 should reflect the key design points.

Criterion 2 – as mentioned in answering question 6 we support co-location however please do not let this be the difference between a blackspot being funded or not in these remote locations. Being in Far North Queensland with the Gulf of Carpentaria and Cape York Peninsula we have some of the remotest areas of Australia and are likely to be the least commercially viable so co-locating MNOs may not be an option. This criteria could be covered perhaps within Criteria 3 dot point 4 "degree to which the proposal provides service from more than two providers.

Criterion 3 – dot point 4 "degree to which the proposal provides service from more than two providers" appears to be a double dip with Criterion 2.

Perhaps criterion 3 could also include the type of coverage provided i.e. 3G v 4G v 4Gx v 5G.

 Addition Comments
It was not mentioned in the discussion paper but the issue of councils contributing to infrastructure costs have been continually raised in relation to mobile coverage. FNQROC member councils have considered this and find it unfair to fund infrastructure that provided 'as of right' in urban areas. These rural and remote area councils are the least resourced to make a contribution. The below table identifies each of the local governments within FNQROC, their population and SEIFA Disadvantage index.

Council	Type	Population (ERP2018)	SEIFA Disadvantage Index (2016)
Cairns	Regional	~165,000	980
Hope Vale Aboriginal Shire	Aboriginal	1,081	621
Wujal Wujal Aboriginal Shire	Aboriginal	306	596
Yarrabah Aboriginal Shire	Aboriginal	2,848	518
Cassowary Coast	Rural	29,689	931
Carpentaria	Remote	1,974	858
Cook	Remote	4,445	917
Croydon	Remote	288	884
Douglas	Rural	12,257	981
Etheridge	Remote	804	932
Hinchinbrook	Rural	10,805	960
Mareeba	Rural	22,517	936
Tablelands	Rural	25,541	949

We recognise it is difficult for the Commonwealth to have a firm understanding of the on ground issues across this vast nation and it is difficult to understand and fix the many issues in regional, rural and remote areas as Queensland is different to New South Wales as it is to Victoria. We thank you for providing the opportunity to comment on this discussion paper.

Should you wish to discuss any aspect of our submission please to not hesitate to contact me on [personal information removed].

Yours sincerely

Darlene Irvine
Executive Officer
Far North Queensland Regional Organisation of Councils