

Discussion Paper Feedback

Title of Discussion paper: Mobile Black Spot Program – Round 5A
Sponsoring Agency: Federal Minister for Regional Health, Regional Communications and Local Government

Department of State Development, Tourism and Innovation (DSDTI) comments:

DSDTI notes the discussion paper and requests that the following amendments are made.

Tourism

Tourism Division suggest the following changes to the discussion paper.

Issue: It is suggested that cyclone-prone areas be specifically included as an eligible area under the priority area (a.) High priority natural disaster prone areas including those affected or prone to bushfire (refer to Page 6 of the Discussion Paper).

Issue: The move away from addressing coverage issues at Public Interest Premises, as per Rounds 4 and 5 suggests economic centres (including tourist sites) will no longer be eligible (refer to Page 5 of the Discussion Paper).

It is suggested that Economic Centres, including Tourist Sites, are included in the specific criteria of which each of the three funding components are assessed.

Innovation

Issue: Question 2 - Are there any comments on the types of proposals that would be eligible for funding, including the required coverage outcomes?

DSDTI supports the three priority areas a), b) and c) as outlined below.

(a) High priority natural disaster prone areas including those affected or prone to bushfire

We suggest the inclusion of cyclone prone areas in the list of Eligible Areas (page 6) to make it explicit these areas are prioritised.

(b) New technology solutions in areas where low population densities have discouraged applications under earlier rounds

We support the option of encouraging shared RAN type solutions (or other multi-provider outcomes) for low population density areas (and other areas for that matter). However, we also believe that the program could provide better support for funding traditional MNO macro/small cell outcomes in these areas as well – The point about *'low population densities have discouraged applications under previous rounds'* is not necessarily due to an unwillingness of States (and other parties) to consider co-funding solutions in such areas. The MBSP scoring model has traditionally placed a heavy weighting on *"the number of premises to receive new coverage"*. This has meant that States have had to often pay "overs" (more than the Commonwealth) to make a macro cell in a low population area competitive in the

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MBSP scoring model. Modifying the scoring model to more equally share the co-funding costs for low population areas would potentially increase submissions, with or without shared RAN type solutions.

(c) Major regional and remote transport corridors

We support the proposed approach of reserving a level of funding to target coverage along major regional and remote transport corridors, however we have some comments about the approach:

* The intention to narrow the definition of major transport routes to those defined in the *Roads of Strategic Importance* initiative and *National Land Transport Network* would appear to exclude many routes of significance in Queensland. For example, it appears that a number of highways and all development roads (precursors to highways in remote areas) are not included in these classifications. These roads can often be many hundreds of kilometres in length and connect many towns across multiple councils/electorates – These roads are critically important and should be eligible for funding.

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

One possible extension to the program could be to allow innovative connectivity solutions if they can still achieve the goal of enabling mobile voice and data connectivity for citizens via other means – i.e. using some combination of private LTE, community Wi-Fi, Wi-fi calling, softphones on mobiles etc. These building blocks are already mature from a technical perspective, however implementations of such technologies are typically either separate connectivity “islands” (not neatly integrated with public cellular networks) or their integration with public cellular networks is “clunky” (e.g. separate billing, manual intervention by user to swap networks, special dual-sim mobile handsets etc). If an offeror could put forward a connectivity solution that addresses these hurdles, and provides an easy-to-use solution for citizens that integrates with public-cellular networks, then this could be an option worth considering for small communities.

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

Consideration needs to be given within the model to ensure that the criteria of *giving priority to solutions offering services from at least two mobile network operators* does not rule out valid single MNO solutions from being submitted, or being competitive in certain circumstances - There can be valid technical or regional based reasons for a single MNO solution to be funded.

Example:

* *Consider Cape York/Torres Strait region in Queensland as an example* – This region has sparse mobile coverage (mainly at townships. hundreds of kilometres of road without coverage) but 95% of the towers that are in this region are from a single MNO. Other MNOs may not wish to invest in a solution which provides an ‘island’ of coverage along the highway in a region that they don’t otherwise service. So the opportunity for improving coverage of an existing MNO in a remote region such as this should not be ruled out (or less competitive) if other MNOs do not wish to participate.

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