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

To whom it may concern

Thank you for the opportunity to provide feedback on design options for Round 5A of the Australian Government's Mobile Black Spot Program.

The Government of South Australia is committed to improving mobile phone connectivity in regional South Australia and is leveraging the $10 million South Australian Mobile Phone Black Spot Fund to address priority mobile phone black spot locations across regional South Australia.

Attached is a response prepared by Primary Industries and Regions South Australia (PIRSA), with input from other relevant South Australian Government agencies, to the questions posed in the Discussion Paper.

In general, PIRSA is supportive of the 3 priority areas listed in the Discussion Paper.

I look forward to the future development of the Mobile Black Spot Program Round 5A.

Yours sincerely

Ann Barclay
DIRECTOR
REGIONS SA

Attachment A: South Australian response to the Australian Government's consultation on design options for their proposed Mobile Black Spot Program Round 5A

1. **Are there any comments on the coverage areas proposed to be targeted?**

The Government of South Australia welcomes the Australian Government's ongoing commitment to the Mobile Black Spot Program (MBSP) as well as the commitment to provide mobile telecommunications users in regional and remote Australia with access to increased handheld and external antenna mobile coverage and greater choice and competition of mobile network service providers.

Since March 2018 the Government of South Australia has engaged fully in MBSP Rounds 4 and 5 and sought to co-invest with both the Commonwealth and industry in the delivery of enhanced mobile telecommunications coverage for the people and communities of regional South Australia. This co-investment has been underpinned by the South Australian Government's $10 million Mobile Phone Black Spot Fund.

An evaluation of mobile black spots prior to MBSP Round 4 identified more than 500 sites across South Australia with coverage gaps impacting significantly on regional communities. The Government of South Australia committed to a total of $11.04 million for 73 black spots out of the South Australian fund in applications to MBSP rounds 4 and 5, with a total 37 sites successfully awarded at $6.27 million State funds. This compares with only $1.46 million South Australian Government investment over MBSP rounds 1 to 3 prior to March 2018.

Because of the big backlog in addressing mobile phone black spots prior to March 2018, and the strategic importance of targeting investment to grow the State's economy, the Government of South Australia places priority on fixing mobile coverage gaps that support maximum economic development opportunities. In this context, the Government of South Australia supports potentially higher levels of funding may be offered to technology solutions that deliver services to low population areas, especially those which support economic development outcomes.

After considering economic development imperatives, priority is given to delivery of continuous coverage for prioritised roads and highways and to address black spots identified as priorities by emergency services authorities.

The Government of South Australia is aware of proposals to phase out 3G in the near future and recognises the important issue when assessing applications to the MBSP should be providing the optimal solution to priority regional black spots, not specifying specific technologies from the outset.

2. **Are there any comments on the types of proposals that would be eligible for funding, including the required coverage outcomes?**

a. **High priority natural disaster prone areas including those affected or prone to bushfire**

- Noting the Government of South Australia's priority for investing in mobile black spot solutions is supporting economic development outcomes, South Australia understands that the Commonwealth may be prepared to take on face value disaster prone areas identified by the Government of South Australia as a high priority for the State. This would be supported by the South Australian Government as there is currently state information available from the Country Fire Service at the start of each season identifying the bushfire prone regions.

- If the above is not accepted, the South Australian Government would be keen to engage the Commonwealth about what they define is a disaster prone area

- From an emergency management and recovery perspective, the South Australian Government supports that Round 5A will seek to improve coverage in natural disaster prone areas including bushfire prone or affected areas, and flood prone areas.

- The recent bushfire on Kangaroo Island identified that black spots did cause firefighting, alerting and evacuation issues and that funding should be prioritised for bushfire prone regions. In South Australia, this varies from season to season, but Kangaroo Island and the Adelaide Hills are ongoing concerns with considerable black spots still in these regions. Lower Eyre Peninsula and the Clare Valley are two other areas that are frequently identified as high bushfire risk.

- The Government of South Australia recognises there are severe limitations on the ability to support additional mobile phone base stations on Kangaroo Island. An option to overcome these limitations is investment in fibre optic cable from the mainland to Kangaroo Island. Funding partnerships for infrastructure of this nature could be considered under future rounds of MBSP or the Commonwealth Government's $53 million Regional Connectivity Program.

- Modern firefighting is heavily reliant on real-time information gathered from the fire ground. Satellite technology is susceptible to fire ground behaviours e.g. smoke and hinders the ability to collect real-time data, thus increasing the need for greater mobile coverage in bushfire prone areas. Timely information is critical in protecting life and property.

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

- The South Australian Government supports that potentially higher levels of funding may be offered to solutions that deliver services to low population areas – those considered remote and very remote, as identified using the Australian Bureau of Statistics' 2011 Remoteness Structure.

c. Major regional and remote transport corridors

- The South Australian Government agrees that transport corridors that deliver recognised economic, social and safety benefits to the community should be given priority, together with communities along those corridors.

- There is also agreement that priority should be given to proposals that offer near continuous coverage along prioritised (eligible) routes / sections /corridors, subject to value for money considerations.

- The South Australian Department of Planning, Transport and Infrastructure (DPTI) supports the proposal to use the National Land Transport Network (NLTN) and Roads of Strategic Importance (ROSI) initiatives as a starting point for identifying suitable remote and regional transport corridors. In addition, DPTI suggest that the National

Key Freight Route maps are included under 'Eligible areas' on p. 7 of the paper. These can be viewed via the online tool at http://maps.infrastructure.gov.au/KeyFreightRoute/ and are also available in pdf form from Infrastructure Australia's website.

- DPTI also requests that the following should be added to the list of eligible transport routes:
  - The length of the Playford Highway, Kangaroo Island
  - East-West though Parndana on Kangaroo Island
  - The Ardrossan – Minlaton Road on Yorke Peninsula
  - Tod Highway on Eyre Peninsula
- Subject to advice about the technology's capabilities (for example, the extent to which a base station could transmit north and south to nearby communities), the Kangaroo Island route may address a number of priority areas flagged last year by the Commissioner for Kangaroo Island. Further, it would address the priority under Round 5A of funding for natural disaster/bushfire-prone areas. Flow-on benefits economically and socially would influence safety, tourism, local businesses, morale of residents and employment opportunities.
- The South Australian Metropolitan Fire Service (MFS) stated that coverage of major regional transport corridors must support emerging automated emergency call systems designed into new vehicles.

3. Is the RAN model an effective sharing model for Australia?

- The South Australian Government agrees that priority should be given to solutions using a shared RAN model – to potentially provide a more cost-effective means for all mobile network operators (MNO's) to increase their coverage areas.
- Regional communities are increasingly advocating for stronger competition and greater adoption of shared sites due to the duopoly nature of coverage providers.
- It is also agreed that solutions should encourage more competition.
- PIRSA notes that to date around 28 per cent of Round 1 - 4 solutions offer co-location or are co-locating on existing infrastructure. It appears that MNO appetite for these types of solutions is limited.

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

- Round 5A seeks to prioritise funded solutions that provide a service from at least two MNOs or support for proposals that offer complementary services from a third party in addition to the two MNOs. This is anticipated to result in extra negotiation time/steps to determine a suitable multi-provider outcome, which may continue to limit uptake by MNO's in this Round.
- South Australia suggests consideration be given to introducing global roaming across all mobile network operators. This would significantly increase the likelihood of individuals in need to get calls through to services they need to help them call for help and keep safe.

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

- The South Australian Government notes that a higher funding cap is proposed compared to the previous Commonwealth funding cap of $500,000 (GST incl.) per solution, where the solutions require multiple base stations, for example to address a road section, or to support a solution in a remote area, and is supportive of this increase.

6. **Are there any comments that you wish to make in relation to eligibility to apply for funding**
- No comments.

7. **Are there any comments that you wish to make regarding ways the program could assist potential state government and third party co-contributors?**
- While State government co-contributions continue to be encouraged, this is not explicitly rewarded in the evaluation criteria.
- Reiterating our response to question 4, Round 5A seeks to prioritise funded solutions that provide a service from at least two MNOs or support for proposals that offer complementary services from a third party in addition to the two MNOs. This is anticipated to result in extra negotiation time/steps to determine a suitable multi-provider outcome, therefore additional time to prepare applications prior to the close date is requested.

8. **Are there any comments regarding the need for a shorter minimum operational period, particularly in remote and very remote areas?**
- No comments.

9. **Are there any comments on the proposed equivalency requirement and 4G reference power levels for handheld and external antenna coverage?**
- The South Australian Government notes that if a proposed solution relies on existing 3G coverage in its proposal to deliver services to an area, the funding recipient will be required to provide equivalent 4G services before that relevant 3G coverage is switched off.
- The South Australian Government is supportive of the move to 4G given the announced phase-out of 3G in the near future. It is not considered prudent to restrict investment of applications necessarily including 3G.

10. **What criteria should be used to identify key sites where independent power systems or redundant backhaul could be funded?**
 No comments.

11. **Are there any comments regarding the requirement for at least 12 hours of auxiliary backup power for small cells?**
- The South Australian Government agrees that the minimum should be 12 hours of auxiliary backup power and extended battery back-up for key sites and the use of alternative non-grid power supplies. This minimum could be extended to 24 hours.
- In addition, recent events such as bushfires have shown that normal use backup arrangements do not address the increased public need for these assets during an emergency. Consideration could be given the specific sites be rated for 72 hours backup at maximum site use.

12. **Do you have any comments on the proposed assessment criteria?**
- More detail is required regarding how funding will be split across the three priority areas.