To whom it may concern

19th June 2020

Dear Sir/Madam

Responding to the Mobile Black Spot Program (Round 5A) Discussion Paper

The Margaret River Busselton Tourism Association (MRBTA) is a self-funded, not-for-profit membership-based organisation, representing more than 600 local businesses in the Margaret River Region's tourism and hospitality sector.

The MRBTA operates four caves, two lighthouses, an adventure ropes course and manages airport ground handling. The funds generated by MRBTA allows it to enhance sustainable tourism by marketing the region to visitors, undertaking visitor servicing, providing high quality attractions and investing in the conservation and preservation of its natural and heritage assets, with a resulting contribution to the economy of the region.

Mobile coverage within our region is currently limited/unreliable and as such we would like to respond to key questions raised within the Mobile Black Spot Program—Round 5A—Discussion paper. Our submission is attached to this letter

Yours sincerely,

Steve Harrison
Joint CEO
 [personal information removed]

Response to Mobile Black Spot Program (Round 5A) Discussion Paper

Question 1
Are there any comments on the coverage areas proposed to be targeted?
The three priority areas are supported by MRBTA, they address key areas of concern to our region and communities. Additionally, this project will provide beneficial coverage for visitors and tourists travelling in or through these areas whose service providers are currently limited to more urban areas.

Question 2
Are there any comments on the types of proposals that would be eligible for funding, including the required coverage outcomes?
These types of funding proposals are both pragmatic and flexible to encourage MNO's to invest and provide coverage in remote and regional areas of need

Question 3
Is the RAN model an effective sharing model for Australia?
The RAN model would appear to the most efficient model for Australia, as the investment and ongoing maintenance costs of the infrastructure required for the system would be considerate given the limitations and access constraints to many remote and regional areas within Australia. Reference to the New Zealand success is promising and great promise for similar results to be expected with Australia.

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

Neutral Host Infrastructure models are something that could be considered, however we deem them not desirable in remote and regional locations as the ongoing costs would be considerable and ability for a MNO to fully or partial recovered these costs from user revenue is unlikely, leading to less desire and competition to deliver the coverage.

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

The Funding cap and eligible costs seem reasonable in the current situation

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

Funding eligibility seemed reasonable

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?
Co-contributions make sense where possible, providing that there is an appetite and capacity from state government to contribute or provide sufficient ROI for third parties.

Question 8
Are there any comments regarding the need for a shorter minimum operational period, particularly in remote and very remote areas?
Given the substantial levels of funding and investment a continuation of a 10 year minimum operational period should be applied

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

The power levels for Handheld and external antenna coverage should be at a minimum the equivalence of the 3G, but given recent developments, customer expectations around speed and access then this round should seek to have better than equivalent outcomes

Also please note there appears to be a typo/missing text in the discussion paper as per below;
- Coverage standards—Proposed 4G reference power levels for handheld and external antenna coverage have been developed (see) to replace the 3G reference power levels used for Rounds 1 to 5.

Question 10
What criteria should be used to identify key sites where independent power systems or redundant backhaul could be funded?
Certainly, in the aftermath of several recent natural disasters resulting in prolonged periods of power outages and long restoration times, there must be an increase in criteria to identify key sites where independent power systems must be a requirement.
The ability for these projects to learn from past events and build in better safeguards and measures to ensure a faster reactivation of the network and coverage is essential.
Community expectations and emergency services requirements are now higher and will only increase in the coming years.
MNO's must be able to demonstrate as part of the funding application what undertakings will be in place to ensure lengthy outages are minimal.

The criteria to be used in identifying key sites must include, items like:
- Core network connection
- Federal Network routes
- High risk to bushfire prone areas
- Visitation spikes for seasonality or events
- Distance between alternative towers/coverage for medical or emergency communications
- Projected population growths and community developments.

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

A minimum of 12 hours seems sensible for small cells, however some key logistical locations may require the minimum to be increased to perhaps 24 hours, for example areas along national freight routes or areas close to key medical or remote communities.

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

All 3 criteria are reasonable, the only additional consideration is the ability to handle increase in load on the networks. Operating in a highly desirable tourist destination the access and reliability of the network is considerably reduced during periods of high visitation, including summer months, school holidays, long weekends and events. This must be factored into key areas around the nation.