



# Design of Mobile Black Spot Program


## Round 5A Submission

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## About NSW Farmers

The NSW Farmers' Association is Australia's largest state farming organisation representing the interests of its farmer members. NSW Farmers is Australia's only state-based farming organisation that represents the interests of farmers of all agricultural commodities. Our purpose is to build a profitable and sustainable New South Wales farming sector.

Our focus is not just on issues affecting particular crops or animals – it extends to the environment, biosecurity, water, economics, trade, and rural and regional affairs. Our industrial relations section provides highly specialised advice on labour and workplace matters.

Farmers across New South Wales produce more than \$17 billion worth of food and fibre every year, including over \$6 billion in exports, representing around one quarter of Australia's total agricultural output.

Our regional branch network ensures local voices guide and shape our positions on issues which affect real people in real communities. Our Branch members bring policy ideas to Annual Conference, our Advisory Committees provide specialist, practical advice to decision makers on issues affecting the sector, our 60 member Executive Council is the final arbiter of the policies of the Association.

## Executive Summary

NSW Farmers continues to support the objectives of the Mobile Black Spot Program (MBSP) to improve mobile coverage and competition across Australia by funding new telecommunications infrastructure to deliver new and improved coverage to regional and remote Australia. It is critical that the intended outcomes, to provide regional and remote telecommunications users with access to increased handheld and external antenna mobile coverage and greater choice of mobile network, are achieved.

Current network coverage restraints not only impede and detrimentally affect farming businesses and family life, they prevent these businesses from expanding and maximising their potential. The focus moving forward should be on providing lasting solutions that enable growth and increased productivity, rather than providing a minimum service.

To help inform our response to this consultation, NSW Farmers conducted a member survey to identify specific mobile black spot areas and current constraints caused by poor access to quality mobile service.

The survey results reaffirm these points; the current state of telecommunications in rural and regional areas is not only impeding business and productivity, but causing health and safety concerns.

The COVID-19 pandemic has exacerbated the issue as many services moved exclusively or predominately online. This highlighted the modern reliance on and assumption of instant connectivity that is unavailable to many farmers.

Aside from the inconvenience experienced, this causes farmers to miss business opportunities and increases their workload. It also highlighted the struggles faced in filling out simple paperwork online, as many government services now require, or the inability to utilise online banking due to the two step security verification. Others also noted that children back home from boarding school or university faced issues trying to continue their studies due poor service.

For example, one farmer noted that they are forced to make special designated trips back to the house each day in order to make or take phone calls. Many respondents noted that they simply cannot access or upgrade agricultural technology that would improve their productivity as they require mobile service.

If agriculture is to meet its goal of being a \$100 billion industry by 2030, rural and regional communities, farmers, and the broader agricultural sector need access to reliable, quality telecommunications.

The following comments relate to the proposed Round 5A key design principles and consultation questions.

## **Design Principle 1: Delivering coverage benefits for non-commercial regional and remote areas**

NSW Farmers provides in principle support for the suggested priority areas under Round 5A.

### ***a. Natural disaster prone areas***

In relation to natural disaster prone areas, we note that it is very difficult to know where a natural disaster might occur, so it will be very difficult to establish criteria for this priority. The discussion paper does not delve into how this criteria might operate practically, for example what constitutes a natural disaster or an area “prone to” natural disaster. If it is to remain a key criteria, we suggest its scope should include bushfire prone or affected areas, flood prone areas, areas that experience severe storms, emergency disaster coordination zones, rural and regional emergency service premises and evacuation and assembly points. We suggest a focus on areas with high productivity but low population.

Additionally, we note that careful consideration should be given to applications to ensure the best consumer connectivity outcomes are achieved. For example, some areas such as highly bushfire prone forests and National Parks may qualify, but it is only necessary to achieve coverage on the transport links through these areas, not the entire Park. It is critical that the connectivity delivers the best outcome for the communities especially supporting economic continuity and growth.

As part of the member survey we conducted, we asked members to identify specific locations where they experienced a loss of mobile service due to natural disasters. Most of the respondents were affected by the recent 2019/20 bushfires, the Sir Ivan Fire (2017), floods, or storms.

Many indicated that they never have mobile service, and this issue is exacerbated in times of disaster when other forms of telecommunication are also lost. For example, many rely on cell fi boosters in order to have mobile service whilst in the house, but due to power outages this was lost. Similarly, those who ordinarily rely on a landline service lost access to this, and were left facing a natural disaster without access to telecommunications to connect with the outside world. For a number of respondents, this meant that they were unable to or severely inhibited in their monitoring of nearby fires, and were unable to warn others out on their property or neighbouring properties.

It is important that rural and regional Australians have access to multiple forms of telecommunications, as those living in metropolitan areas do. That way, if one or more fails, there is more likely to be an available back up option. This is particularly important in rural and regional areas due to the increased likelihood that one form of telecommunication will be lost, and the lengthy delays for repairs to take place.

It is critical that all Australians have access to telecommunications when facing natural disaster and emergency situations.

To improve network resilience and backup power capabilities, we suggest investment in solar and generator backup, or other proven innovations potentially separated from the grid.

The following table includes the feedback offered by our members, detailing the type of natural disaster they experienced, the length of the outage, and their location. For privacy reasons, specific locations are attached separately in **Appendix A**.

| Natural disaster details (type, length of outage)   | Natural disaster locations  |
|---|---|
| Bushfire - 8 days.<br>Flood - 9 days  | Bellbrook 2440  |
| Never had mobile service  | Upper Fine Flower NSW   |
| Without service for 2 days  | Taylors Arm 2447  |
| Coverage is poor most of the time, but was worse or non-existent during the late 2019 bushfires   | Collombatti 2440  |
| Bushfires. Never have mobile reception, and lost landline and internet for 6 weeks  | Bobin 2429  |
| Service lost for approx. 2 weeks  | Southern Highlands, extending west from High Range through to Wombeyan Caves  |
| Bushfire. Had no service for around 12 hours, so had no way to communicate or get news (or help) while the fire was making its way towards our property.  | Mongarlowe  |
| Bushfires in January 2020.<br>Were without a landline service for seven weeks and had no other means of communication.  | Countegany - fires from the Badja Road/Countegany area  |
| No mobile service   | Rugby, NSW  |
| Generally don't have service 24/7, but this is exacerbated when the landline is out due to storms, flood, fire, etc.  | Moulamein 2733  |
| Very limited to no service  | Aanbranch South 2648 NSW  |
| Prone to flood (2016 - flooded in for two weeks) with very poor mobile reception at all times   | Aratula NSW 2714.   |
| Bushfires limited coverage.   | In the Tarcutta area, placement of existing tower in the wrong location.  |
| No Mobile service at all. Fires all around us in Jan/Feb  | Wapengo Lake  |
| 3 weeks without service   | Tumbarumba NSW  |
| Highly fire prone area  | Wymah Road which goes from Bowna to Jingellic   |
| Bushfires – Dunn's Road Fire. Had no electricity for 2 weeks, no landline phone for 7 weeks.<br>Have never had mobile coverage on 90% on property, with coverage on the hill disappearing during the fire and for 3-4 weeks after.                      | Darlow, 2729, near Adelong, Yaven Creek and Ellerslie.  |
| We are in a location that does not have mobile coverage. We utilise a booster aerial but when impacted by the bushfires we had no power and no form of communication for 3 weeks. At this date we still do not have a landline either.                  | Adelong   |
| Bushfires. Have never had mobile coverage and continues to be a major concern.<br>Attempted to use 'Whatsapp' as a communication tool between RFS and this failed.  | Yaven Creek, Darlow and Mount Adrah areas near Adelong NSW  |
| Dunns Road Bushfire. Without mobile signal for cell fi booster for up to two weeks.   | South-southwest of Adelong. Signal is from the 4G tower located near Batlow as there are no towers covering the area west of Adelong to the Hume highway along the Snowy Mountains Highway. |
| Bushfire. Two weeks.  | Yaven Creek Road  |
| We were affected by the Jan 2020 bush fires which took most of our property.<br>Our farm and livelihood relies on Satellite internet and Mobile WIFI only at our homestead, we also rely on Solar Powered electricity so the combination of the two and | Nungatta NSW 2551   |

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|---|--|
| choking smoke for weeks deemed us uncontactable with the outside world for long periods of time, we were lucky enough to be able to monitor the fire apps when available which may have only been once a day or less (not the ideal way to prepare for the catastrophic bush fire that we endured on the 4th of January)            |  |
| The Baradine Optus tower drops out every time they get a black out. It is widely used as the Pilliga is on its door step, so probably a good one to have a back-up power system for fire or storm.  | Baradine Optus tower   |
| Heavy timbered forests, very fire prone.  | Between Coonabarabran and Bugaldie   |
| Storm. Unreliable for 2 to 3 weeks.   | Gobarralong NSW 2727   |
| Continuous drop outs at various times   | Kulnura NSW  |
| 7 days  | Upper Hunter 2337  |
| Bushfires   | East of Rylestone service is very poor. Key areas are Olinda, Nullo Mountain, and Coxs Creek.                            |
| Extensive issues with mobile coverage/phone coverage. During recent bushfires this community had no contact with outside, often family from out of Wolgan Valley did not know if their loved ones were safe or not...and didn't know for many days until they could get out.  | Wolgan Valley  |
| We lose all reception if there is a power blackout due to a storm as we have to use a booster in the house to get any reception.  | Wuuluman NSW 2820  |
| No mobile phone service (or landline service) during Sir Ivan Bushfire from Sunday till Tuesday   | Cassilis   |
| During the Sir Ivan fire (Feb 2017) our mobile phone service failed, as the fire was approaching our property. This meant a total loss of communications, including our wireless internet. We were unable to communicate with the RFS and as we have poor radio reception, we were isolated. The service was down for several days. | Cassilis 2329  |
| Sir Ivan Fire   | Cassilis area  |
| Sir Ivan Fire, mobiles out several days   | Cassilis NSW   |
| Sir Ivan Doherty Bushfire - complete failure of communication radio, landline, mobile - can't remember specific times, battery failure one issue.   | Cassilis NSW 2329  |
| Sir Ivan Fire, nil service  | Cassilis area  |
| Patchy service beyond town area creates major issues in fires calling RFS members and communicating with neighbours   | Merriwa district   |
| I am a Group Deputy Captain of Nevertire Rural Fire Service. We often have trouble contacting members including myself when we get a fire call due to patchy/variable reception levels  | Nevertire area   |
| Bushfire events, accidents, responding to emergency events  | Cathundral, Nevertire, Boro Bogan, Cathundral Bogan, Quigley Carroll Road  |
| Mobile service still atrocious and no internet for more than 3 weeks  | Bombira NSW 2850   |
| Storm, 1 week   | Belltrees 2337   |
| There is no Mobile reception. At the top of the cutting and around where the Pearson Trail Fire was in Dec 2019 the mobile reception was very patchy.   | South eastern end of Dungowan Valley at the base of the Port Stephens Cutting and up the Cutting and up to Dungowan Dam. |

|  |   |
|--|---|
| Bush fires   | Bundarra  |
| Storms   | Barraba   |
| There was and continues to be no service on the fire ground.   | Upper Horton 2347   |
| Wandsworth fire. We have no mobile coverage whatsoever. We could only rely on the ABC and unfortunately the Wandsworth fire only had limited coverage. When power was affected we could not even use the NSW fire app.   | Along the Tingha - Guyra Road   |
| Had phone problems during bush fires on and off from September through to December 2019  | Guyra Rd 4655   |
| We are in a black spot area but have a cell fi booster in the house. Storms regularly cause power outages but the worst was late last year when we lost power for around 24 hours.   | Wandsworth 2365   |
| Very limited coverage went down during bushfires in November and December 2019. Fire fighters were unable to communicate with each other.  | Winterbourne Moona area east of Walcha. The area east of the Walcha to Uralla Road has very poor coverage and a new tower on Blue Mountain is critical. |
| Windstorm - 5 days without service both Landline & Mobile.<br>Landline can be out for months at a time.  | Walcha Area Campfire Road   |
| Bushfire – Carrai fire. No phone coverage and often limited radio coverage. At one point UHF messages had to be relayed to get around a hill.  | Fighting the Carrai fire around the Winterbourne area.  |
| Unable to get any coverage for a number of days. No other Telstra towers within range in the area.   | Mobile phone tower outage from Round Mountain at Wollomombi   |
| During fires the tower was down for weeks  | Wollomombi  |
| No phone service during December bushfires from Telstra, for over 3 days, specifically Friday, Saturday & Sunday. However, Optus were able to put in a booster/battery at Ebor on the Friday, but Telstra did nothing until the Monday. Seems like there is no work by Telstra over weekends.              | Ebor  |
| When the fires burnt us out we were 3 weeks without a landline and 5 days without mobile service.  | Ebor area   |
| Need to get coverage into the Styx River state forest to help with communications during fires. The RFS radios were overloaded so we needed to use mobile phone to contact people and our brigade.   | Styx River state forest   |
| Have never had adequate mobile service.<br>There were fires about 12km to the North of us last summer, so it would have been very useful to be able to use the "Fires near me" app when working on the farm.   | Fernbrook (Via Dorrigo)   |
| Bushfires. Due to intermittent mobile service, rely on a booster in the house. Had no power due to the fires and therefore no Telstra booster for mobile service. The landline was also out.   | Torryburn NSW 2358  |
| No service. During the December fires we had to find a landline to communicate. The private property from where the fire got away (after fighting the Warra NP fire for 3 weeks) on 16 December 2019 the owners couldn't contact their neighbours out feeding cattle because there is no mobile reception! | Backwater 2365<br>Oban 2365<br>Kookabookra 2370   |
| No mobile service and landlines drop out frequently  | Glencoe NSW 2365  |
| Bush fires   | Tower at Exmouth (Black Mountain)   |

|   |              |
|---|--------------|
| Bush fires  | Shannon Vale |
| Without both landline and mobile service for approx. 2 months due to bushfires in other areas | Yetman NSW   |
| Bush fires  | Bullarah     |

***b. New technology solutions in areas with low population densities***

We strongly support improved reliability, quality and affordability of telecommunications in all rural, regional and remote areas, whether this is through new or existing technology solutions. We note that as the Program progresses and increasingly the black spots have low and more dispersed populations, it is being stated that it is becoming less commercially viable to provide traditional solutions such as towers. NSW Farmers supports an increase in access to proven innovations to help alleviate this issue that will result in long term, lasting solutions.

This could include effective use or repurposing of existing technology and infrastructure. Additionally, new technologies to improve efficiency and productivity cannot be taken up due to their requirement for mobile service. For example: adoption of electronic NVDs has been slow due to problems with internet connection and access to the documentation by transport providers enroute.

It is also important to highlight the need for new technology solutions in low density population areas to ensure equity in connectivity access as well as identifying solutions that aid extended coverage for a broader geographical area. The percentage of people to be covered is just one aspect of providing improved service in low density population areas; it is critical that solutions also improve trusted and quality connectivity and access across farmland and more isolated transport corridors.

Agriculture is a sector that is poised to hugely benefit from productivity gains that will be led by data and remote management on-farm infrastructure. New technology and machinery that is being developed and used on farm assumes basic levels of connectivity that in reality are not available for farming communities. This will negatively impact the full utilisation of autonomous vehicles – both on-farm and on-road. Interoperability will be critical for the future and NSW Farmers considers this must be considered in applications for Round 5A.

The results of our member survey showed that almost half of respondents utilise a cell fi booster device and almost all respondents have recently upgraded their device. One member noted that they cannot upgrade their phone as they are forced to plug it in to an aerial to receive reception, and newer devices do not have this capability.

Even with a cell fi booster, these members only have access to mobile service in the house or car. This means that when they are out in the paddock, they have no service. This has a number of implications including:

- **Safety.** Frequently farmers or farm workers work in isolation. Many members noted that if an accident were to happen, they would be unable to call for assistance. If someone was bitten by a snake, they would need to move to try and find service rather than remaining still to prevent the poison spreading. One farmer provided the example of a staff member who suffered serious injuries and had to drag themselves over one kilometre in order to get reception.



- **Productivity.** Many members noted that outside of the house they often have to travel into town to secure mobile service. As they do not have mobile phone reception in the paddock, they are forced to make designated trips back to the house or the top of hills to make and take calls throughout the day. They are also unable to communicate effectively with staff in the paddock. Simple tasks such as making an online application, sending an email or text, or accessing online auctions or banking are impossible. If farmers could access these services whilst out on the tractor their productivity would improve immensely. Similarly, new technologies to improve efficiency and productivity cannot be taken up due to their requirement for mobile service.
- **Business.** Farmers interact with a number of people as part of their business including agents and transport companies. They often miss business opportunities as a result of their lack of mobile service and missing calls.

Additionally, quality, reliable mobile services are critical for health, education and social reasons, as has been highlighted by the COVID-19 pandemic. We support solutions including cell fi devices and small cells to improve connectivity, but ideally more lasting solutions will be provided.

We would support a sharing model to enable multiple providers to cover a single area. This promotes competition and prevents the situation where a town relies on one company's tower but cannot access coverage for extended distances upon leaving town as those areas are covered by a different provider.

We recognise that it is more costly to provide these low population density areas with sustainable telecommunications solutions, but it is important that they receive access to this essential service.

### ***c. Priority areas along rural, regional and remote roads***

We support the priority of providing mobile service along major regional and remote transport corridors to achieve safety and productivity outcomes. However we highlight that it is critical that service is also provided in towns and localities along these corridors. The aim should not be to provide mobile service to transport corridors in isolation.

In the recent NSW Farmers telecommunications survey, we also asked members to provide details of mobile black spots along rural and regional roads.

The locations identified in this survey include highways and main thoroughfares used frequently by farmers and other road users travelling between regional centres. This could include people travelling for work, health, business, education or tourism.

Reliable reception is crucial travelling along regional roads. People who live in regional areas are often travelling on the road for longer periods of time. If there is an accident, they will likely be a long distance from a well-resourced hospital. Yet often there are large expanses of major roads that remain without reception.

For example, many people travel from the Armidale/Walcha region travel down the Thunderbolts Way/Gloucester Road to reach Newcastle or Sydney. This includes many students studying at the University of New England in Armidale. Currently, service along this journey is patchy, and particularly bad in the area surrounding Walcha. If there were an accident it may be difficult to reach help. This is just one example of the dangers faced on these frequently used roads with inadequate reception.

The following areas were highlighted in the survey numerous times:

- The Golden Highway, particularly travelling between Cassilis, Merriwa, Mudgee, Dunedoo
- Adelong area particularly Yaven Creek Road
- Nevertire area e.g. Quigley-Carroll Rd, Enmore Road, Trangie, Boro-Bogan Road Nevertire, Thornton Lane, Cathundral, Cathundral-Bogan Road, Cathundral, Cremorne Lane, Nevertire, Nevertire Township,
- Walcha area e.g. Thunderbolts Way/Gloucester Road
- Waterfall Way east of Armidale
- Travelling between Bundarra & Inverell/Armidale/Uralla e.g. Bundarra Road, Thunderbolts Road
- Armidale to Glen Innes, Glen Innes to Tenterfield, Glen Innes to Inverell e.g. New England Highway, Tingha/Guyra Road, Gwydir Highway
- Moree area, particularly north of Moree including Croppa Creek and Twin Rivers areas e.g. Bruxner Highway, Keetah-Boonal Rd, Tuckah Tuckah Road
- Ashford Road near Inverell
- Bingara/Barraba/Narrabri area
- Killarney Gap Road, near Narrabri
- Nyngan Tottenham Rd (now called The Bogan Way)
- Moulamein/Murray River Council area
- Tocumwal area e.g. Lower River Road
- Dungowan area e.g. Ogunbil Road
- Newell Highway particularly travelling Dubbo to Gilgandra & near Burcher
- Wentworth to Broken Hill
- Crookwell to Boorowa road
- Travelling Cooma to Braidwood
- The Clarence Way
- Oxley Highway
- Castlereagh Highway
- Burley Griffin Way
- Warrawidgee area e.g. Barber Road
- Goulburn area
- Mitchell Highway
- Bulgaldie to Mullaley area near Coonabarrabran (highly timbered)
- Kulnura area, particularly travelling to Broke

We submit the full list of locations for priority mobile black spot areas along transport corridors included as **Appendix B**.

## **Design Principle 2: Promoting competition outcomes**

NSW Farmers supports increased competition to provide consumers with a greater choice of mobile providers. We are aware that there are significant costs in establishing technology which may deter providers with smaller coverage areas. NSW farmers considers that greater competition in regional areas will be critical to improving connectivity. We also note that previous rounds of the program have encouraged competition with little success. Increased competition should have a positive impact on the

cost of accessing stable telecommunications, as costs are currently much higher than in metropolitan areas whilst service in the main is of poorer quality and reliability.

We support continued emphasis on co-location on infrastructure to achieve this outcome, and support prioritising solutions that provide a service from at least two MNOs. However, increased area, quality and reliability of service is the most critical outcome.

The RAN model could support the sharing of services, however it also has the potential to further complicate infrastructure sharing arrangements. For this reason, we suggest that the RAN model is one potential multi-provider design option, but should not be given priority over other options. The critical outcome is that competition is increased in a way that is supported by providers and consumers to deliver a lasting solution.

NSW Farmers also highlights that Telstra is to cease delivery over the 3G network. While we understand that accessibility will be available on the 4G network, it is critically important to recognise that in more remote locations mobile phone owners may lag in terms of uptake of newer technologies. It will be important that in the race to deliver the most up to date technology, there is consideration of price and hardware imposts that may be inaccessible to a number of the more access challenged residents.

### ***Design Principle 3: Funding is available for the capital costs of proposed solutions and some operational and maintenance costs***

NSW Farmers supports an increased funding cap for the program due to increased capital costs and low potential return on investment for providers as the locations become more geographically challenging or remote. An increased funding cap provides further scope to achieve the intended outcomes of the program, including potential for larger, multi-base station projects and bespoke solutions for isolated areas.

We recognise that longer term viability may indicate a need for ongoing cost provisions for providers. NSW Farmers' considers however that priority should be given to proposals that primarily seek to cover capital costs and which identify a commitment to subsidise (partially underwrite) ongoing costs.

One new potential model for operational and backhaul costs may include consideration of separating the tower and backhaul components of a build. This type of model could invite more competition from providers who may be excluded from bidding under the current contract design terms.

### ***Design Principle 4: Funding is available for mobile network operators, and for mobile infrastructure providers with priority given to solutions offering services from at least two mobile network operators***

NSW Farmers is conscious that the Mobile Black Spot funding is a combination of both public and private (telco) funding and as such should deliver public assets that delivers for the end user. The existing model of

one tower for one Telecommunications Company needs to be reconsidered. NSW Farmers is aware that licencing may enable shared access, but this is limited by the capacity of the tower or telecommunication infrastructure. We seek greater analysis of the benefit of a multiple collaboration/contribution to the infrastructure costs and analysis to determine (with the community) the most valuable outcome and therefore technology to be approved for funding.

NSW Farmers supports opening the program up to include both mobile network operators and mobile infrastructure providers to promote competition outcomes. NSW Farmers also considers that greater flexibility is required in the contracting terms to enable shared access. There may be significant value in Government seeking collaborative bids from providers to ensure the broadest possible access. The reality for more remote less populated areas is that there will be greater numbers of transient users – either as short-term workers, or as travellers. Public contributions to enable significant telecommunications infrastructure must, as a principle, seek to ensure the broadest possible access and where possible seek to be provider agnostic.

NSW Farmers notes that roaming is not available in Australia which creates significant connectivity challenges and can be a disincentive to attract additional providers to deliver continuity of service in less commercially viable locations. Small Cell solutions can be appropriate, but they do not address the major issues for more isolated or geographically challenged locations as they are single provider solutions.

We also recognise that while there is a public good to be achieved from the Mobile Black Spot program – the need for sustainability and therefore profitability must be achievable. In this instance sustainability and profitability must be within the envelope of the total business – and recognition that the provider should be factoring in their whole of network sustainability and profitability – not that each service must meet these requirements individually.

NSW Farmers considers the following worthy of further consideration:

- an infrastructure model that supports public ownership of the infrastructure and where competition starts at the point of retail engagement with the customer;
- options for roaming models in less densely populated areas;
- co-contributions from service providers to form partnerships on infrastructure – multiple proponents for a single project; and
- government policy change to foster more appropriate strategies and access for sharing of essential infrastructure.

## **Design Principle 5: Support for state government and third party co-contributions**

NSW Farmers supports state government contributions, but notes that the Federal Government should work with state and territory governments to prevent overlap and duplication of programs, and to maximise benefits.

The Federal Government could also assist in facilitating partnerships and co-investment with state governments and third parties.

It would also be beneficial to offer assistance to communities to aid their engagement with mobile network operators and infrastructure providers. Areas may miss out due to their inhibited ability to liaise with potential program applicants and effectively communicate their case or provide a co-contribution. Assisting these communities could help ensure mobile infrastructure is delivered where it is needed the most.

## **Design Principle 6: Mobile Services need to be provided for a minimum period after Asset Completion**

NSW Farmers supports a continuation of the current 10 year minimum operational period requirement in order to deliver lasting solutions to consumers in these areas.

In relation to the proposed move from a minimum 3G service to a minimum 4G, we would like to see guarantees to support the switch. We understand that Telstra has made the decision to switch off 3G services by 2024, and other carriers are likely to do the same.

However, many of our members currently rely on 3G service and devices, and are concerned that their access to mobile service will be reduced with this change. We request that any solutions that propose to switch off 3G services provide at least equivalent 4G services, adequate lead-times and notice for consumers to transition to 4G service.

## **Other Design Principles**

### ***Network resilience***

NSW Farmers supports the proposal that all funded solutions should provide at least 12 hours of auxiliary backup power.

We support an increased focus on backup power and network resilience in order to minimise and avoid the extended outages experienced by consumers noted above, for example during the recent 2019/20 bushfires.

The feedback we received from our members included failures due to loss of traditional power, but also due to loss of solar power as a result of the ongoing heavy smoke conditions. We also note the limitations of generators, as outlined in the discussion paper.

We support investigation into innovative options that may be able to operate independently of the power grid to provide potential backup power. If a viable, cost-effective solution becomes available, this would be of great benefit.

### ***Comments on proposed assessment criteria***

NSW Farmers supports improved and expanded access to reliable, quality, affordable mobile services that promotes competition outcomes.

We note that the program intends to test potential improved coverage outcomes against coverage maps, and raise our concerns that these maps are not always accurate. We suggest further consultation with relevant communities to ensure map assumptions are correct.

## Attachments

**Please note:** The Appendices are provided separately. As they contain personal information, for privacy reasons NSW Farmers does not give permission for these to be published.

**Appendix A**      Locations of Natural Disaster Risk in NSW

**Appendix B**      Locations of Black Spots on Rural and Regional Roads in NSW