

16 June 2020

Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 594  
Canberra ACT 2601

To whom it may concern

### **Consultation on design options for Round 5A of the Mobile Black Spot Program**

Thank you for the opportunity to provide input on the design of the next round of the Commonwealth Government's Mobile Black Spot Program.

RAA is South Australia's largest member organisation, representing more than 750,000 South Australians (around half the state) and providing them with a diverse range of motor, home and travel products and services. RAA has had a trusted advocacy role in transport and mobility for more than 116 years and we have been providing South Australians with travel services for more than 50 years.

RAA is supportive of the Mobile Black Spot Program as a way to improve safety and connectivity. Our input on the discussion paper for Round 5A of the program is limited to feedback on the coverage areas proposed to be targeted (Question 1) and the types of proposals that would be eligible for funding (Question 2).

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

RAA strongly supports the proposed inclusion of major regional and remote transport corridors as a component of Round 5A. We have also advocated to the South Australian Government for a consistent level of reliable mobile data coverage along our transport corridors, having identified long sections of national and state highway in South Australia that do not currently provide this (e.g. on the Stuart Highway and Eyre Highway). We believe that improved mobile connectivity along major regional and remote transport corridors would deliver several benefits:

- **Freight** – As indicated in the discussion paper, improved mobile coverage along transport corridors is important for supporting freight operations and facilitating the deployment of innovative freight technologies, including connected and autonomous heavy vehicles (see below).
- **Development of connected and autonomous vehicles** – Connected and autonomous vehicles will need continuous mobile connectivity in order to travel through regional and remote areas. While it is likely that 5G mobile coverage will be required to support the large-scale adoption of autonomous vehicles, putting infrastructure in place to remove highway mobile black spots is an important initial step in preparing the road network.
- **Road safety** – Post crash care is a key pillar of a Safe System approach, and requires the swift provision of emergency treatment in the case of a road crash. Emergency calls to 000 only work from within the coverage area of one of Australia's mobile providers. Removing mobile black spots along transport corridors therefore enables

the emergency services to be contacted more quickly and has the potential to save lives.

- Tourism – The tourism industry makes a substantial economic contribution to many regional and remote parts of Australia. Tourists increasingly rely on smartphone internet access for navigation, recommendations of where to go and what to do, and to share their experiences on social media. Since most tourists travel in groups, these activities are often carried out by passengers travelling to and from tourist locations. Removing mobile black spots improves the experience of tourists and creates additional business opportunities for tourism operators located close to major regional and remote transport corridors.

The Australian Government should consider designating tourist areas in regional and remote Australia as a fourth priority area. As outlined above, tourists increasingly rely on mobile connectivity. However, some of Australia's premier tourist regions, such as the Flinders Ranges and the western part of Kangaroo Island in South Australia, currently have limited mobile coverage. Investing in improving this coverage would provide a timely boost to the regional visitor economy as the tourism sector recovers from the impact of COVID-19 restrictions.

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

RAA agrees that transport corridors should be prioritised by economic and social benefit. When calculating economic and social benefit, the Australian Government should consider a range of benefits, including freight, vehicle connectivity, tourism and road safety. We agree that transport corridors defined in the Roads of Strategic Importance initiative and National Land Transport Network are likely to deliver higher economic and social benefit than most other corridors given their importance for freight. However, we propose that corridors that fall outside of these two groupings are still considered for funding where they deliver large economic and social benefits. For example, some highways are used extensively for tourism but are not major freight routes (e.g. the highway network in the western half of Kangaroo Island).

RAA welcomes the opportunity to discuss this matter further as required. The contact point at RAA is Mr Charles Mountain, Senior Manager Safety & Infrastructure. Mr Mountain may be reached on 08 8202 4568 or at [CMountain@raa.com.au](mailto:CMountain@raa.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to be 'Sally Warner', written in a cursive style.

Sally Warner  
**A/g General Manager, Government & Public Policy**