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#### RE: Mobile Black Spot Program - Round 5A Discussion Paper

Regional Development Australia Limestone Coast (RDALC) welcomes the opportunity to make a submission on the Mobile Black Sport Program Round 5A Discussion Paper.

The Limestone Coast region encompasses an area of 21, 329 km<sup>2</sup>, has a population of over 66,000, supports 7,319 businesses creating over 30,000 jobs in the region. Gross regional product is in excess of \$3 billion, approximately 3.4% of the States Gross State Product.

The region has a very strong agricultural and forestry industry and makes a major contribution to State and national wealth, however economic growth is constrained by several infrastructure issues, including poor mobile communications for telephones and the internet.

RDALC recently completed two important pieces of work: (i) Infrastructure Audit (ii) Prospectus of Priorities which provide an up-to-date assessment of infrastructure within the Limestone Coast region and opportunities for economic growth. This work identified that issues relating to broadband, mobile black-spots and data coverage were impacting on the productivity and competitiveness of critical industries including forestry and agriculture.

RDALC has recently consulted with the Local Government and industry on the Mobile Black Spot Program Round 5A discussion paper, and feedback from this is provided below.

### **RESPONSE TO QUESTIONS**

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

### High priority natural disaster-prone areas including those affected or prone to bushfire

RDALC welcomes the proposal for bushfire prone areas to be one of the three priority areas identified in Round 5A.

Keilira located within the Kingston District Council is a major blackspot in a bushfire prone area. Poor mobile phone coverage was identified as a major issue in the wake of the devastating Keilira bushfire which burned through 24,750 hectares on 30 December 2019.

The exact location at the exchange (co-ordinates -36.68903 140.14944) does have minimal coverage due to its elevation, however there is no mobile phone service for approximately a 20km radius from this position. The deficiencies of the location severely impacted the ability to communicate during the December bush fire event.







#### Major regional and remote transport corridors

RDALC also welcomes the proposal for major regional and remote transport corridors to be one of the three priority areas identified in Round 5A.

It has been noted however, that the proposed target transport corridors defined in the Roads of Strategic Importance initiative and National Land Transport Network, identifies the Princes Highway West, in the Green Triangle region in Victoria, as a target transport corridor. This, however, does not cover a significant number of mobile black spots that have been identified as major areas of concern by the forestry industry in South Australia. These areas not only significantly impact their day to day business operations, it also raises concerns for the safety of their employees.

RDALC requests that consideration be given to broaden the remote transport corridors recognised in Round 5A to also include to the black spot areas identified by the forestry industry.

The areas impacted by lack of coverage include the areas between Robe and Kingston, Penola and Nangwarry, Mount Burr, and Mount Gambier. Maps of these areas have been provided by forestry group OneFortyOne following their recent consultation with Telstra; see attachment A.

# Are there any comments that you wish to make regarding ways the program could assist potential state government and third party co-contributors?

Concern has been raised within the region that the requirement to co-contribute may unfairly disadvantage smaller local government areas.

Councils with a small ratepayer base and dispersed population, and therefore less ability to provide a co-contribution, are also likely to be those with significant mobile black spots. This may render these areas unable to co-contribute and therefore may miss out.

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

The feedback provided by industry, local government and others impacted by the December 2019 Keilira bushfire, is that 12 hours of auxiliary back up power in a remote location, in the instance of a major fire, is not long enough.

Parties involved with bushfires within the region over the years have advised that historically, the period that the bushfire exclusion zone is in place; until it is deemed safe to enter, is often many days. During this period, the network provider's technicians are also excluded from the zone, delaying fault repairs for days, and sometimes weeks.

RDALC requests that consideration be given to the requirement for a longer period than 12 hours of backup power for small cells.

In summary, connecting regional areas to the rest of world remains a critical challenge requiring investment in the next five years. As key industries, such as agriculture and forestry, become more technology driven, connectivity becomes essential in ensuring regions can compete in a global market.

As businesses are driven to collect, utilise and provide more real time data the infrastructure that underpins this needs to be there to support and enable it. Currently large areas within our region, particularly in less populated areas, lack any mobile or digital connectivity, and as such, RDALC welcomes the proposal for a second component of Round 5A to reserve funding for solutions that deliver services to low population areas.

I would welcome the opportunity to speak to this submission and if you have any specific questions relating, please do not hesitate to contact me.

Yours sincerely

David Wheaton

CHIEF EXECUTIVE OFFICER