



19 June 2020

Our Ref: NS:ID

By email to: MBSPRound5@communications.gov.au

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

Dear Sir / Madam

Mobile Black Spot Program Guidelines, Round 5A

Thank you for the invitation to make a submission concerning the design of the next round of the Mobile Black Spot Program, Round 5A. The Western Australian Local Government Association (WALGA) is the peak industry body for Local Government in Western Australia. The Association is an independent, membership-based organisation representing and supporting the work and interests of 138 Local Governments in Western Australia.

Councils and their communities across Western Australia welcome co-investment from the Commonwealth to extend mobile telephone services in parts of the country that are not economically attractive to the mobile telecommunications providers. This investment has significantly improved services in some areas, but more needs to be done.

Lack of mobile telecommunications service, declining service performance and unreliable access have all recently been raised by Councils as matters of importance. Specifically in the past year, Local Governments have sought support from Government and mobile telecommunications providers to address multi-day network failures across significant areas that have occurred due to power failures and telecommunications equipment failures. Declining area of service surrounding mobile telephone towers has been reported, leading to significant frustration and risk. The community has become reliant on reliable telecommunications services for emergency management, medical services and commercial services. The current arrangements are not delivering this in parts of Australia.

This opportunity to contribute to the design of the Guidelines for Round 5A is timely and appreciated. The comments and recommendations made below seek to ensure that projects supported under this and future rounds of investment address the challenges faced by those living, working and travelling in regional Australia.

Coverage Areas

The Association supports the continued focus on providing coverage in regional and remote regions of Australia.

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It is noted that the Guidelines for Round 5A intend to divide funding into three components addressing:

1. High priority natural disaster prone areas;
2. New technology solutions in areas with low population densities; and
3. Major regional and remote transport corridors.

Natural Disaster Prone Areas

The Association supports the specific consideration of telecommunications needs in areas prone to natural disasters, although this should not apply weighting to areas most recently affected. Rather risk needs to be established on the basis of criteria such as vegetation, environment, weather conditions etc or long term frequency and impact of natural disasters.

It is unclear what the proposed letter of endorsement from a Local Government, State Government or emergency service organisation is intended to establish or verify in the assessment process and therefore what organisations are best placed to provide that endorsement. This needs to be clarified if this is to remain part of the guidelines.

New Technology

Much of Western Australia has a low population density and so new, effective and viable technologies suited to these situations should be encouraged.

Transport Corridors

As identified in the National Freight and Supply Chain Strategy Action Plan, effective telecommunications along freight corridors are an enabler of improved freight efficiency and so investment in improving these services is supported. The National Land Transport Network is too narrowly defined to form the basis for prioritization and the criteria for Roads of Strategic Importance Initiative (ROSI) focusses on the inadequacy of the road infrastructure to meet the required freight tasks. Consequently this is problematic from the perspective of seeking to prioritise mobile telecommunications infrastructure investment where it is of the maximum benefit.

To illustrate, on the Great Eastern Highway, part of the National Land Transport Network, 112km east of Perth (east of Northam) average traffic counts are 2553 vehicles per day (vpd) in each direction of which 26.2% are trucks. On the Albany Highway, not part of the National Land Transport Network, an equivalent distance from Perth records 3703 vpd of which 20.7% are trucks. Although not part of the National Network, this route carries 45% more light vehicles and 15% more trucks.

A similar comparison approximately 100 km north and north east of Perth would show that the Brand Highway (2337 vpd 31% trucks) which is not part of the National Land Transport Network carries more traffic and more heavy vehicles than the Great Northern Highway (1916 vpd 36% trucks) which is part of the Network.

The National Land Transport Network and Roads of Strategic Importance network should be considered, but not exclusively so when identifying important freight routes requiring mobile phone service coverage.

Multi-provider Outcomes

Over the past five Rounds of the Mobile BlackSpot Program, the applicant for 79% of funded projects in WA was Telstra, compared with all other jurisdictions where in total Telstra was the applicant for 71% of funded applications. The Association supports incentives to make it more commercially attractive for mobile network operators other than those awarded funding to deliver services from funded towers. However, this should not be at the expense of expanding network coverage where there is currently no coverage from any service provider.

Co-contributions

Program design to support and encourage co-contributions is supported provided that co-contributions remain not mandatory for a proposal to be successful.

Mobile Service Levels

Local communities have reported a decline in service power over time after new mobile base stations have been established. Presentations from mobile phone operators have advised that this is the result of increasing demand on the infrastructure, particularly data traffic. Service coverage maps provided may not objectively illustrate the level of service a consumer can expect over time. The program design should investigate whether there is a more effective way to estimate the level of service that the proposed solution will deliver and monitor this over time.

Network Resilience

Mobile phone network failure due to inadequate back-up power is too frequently experienced across regional and remote WA, both during natural disasters, and in other events that interrupt the power supply. The experience of residents, workers and travelers is that the power supply companies and telecommunications companies both argue that the other is responsible for ensuring that reliable power supply is available at mobile base stations.

A range of credible scenarios should be developed and used to assess the required auxiliary back-up power required. These scenarios should consider the likelihood of network power being cut to multiple mobile phone towers at the same or similar time, the travel time from service bases as well as the likely time until safe re-entry to a disaster affected area can be achieved. Power failures in regional and remote Western Australia are often for much more than 12 hours, particularly during periods of extreme and catastrophic fire danger when repair crews are unable to access some infrastructure and implement repairs.

Macro cell base stations funded by the Program have been provided with at least 12 hours of auxiliary backup power since Round 3. There are documented cases of the power supply failing in much shorter times. This has been explained by the mobile network operators as the result of old batteries and / or repeated power failures over a few days. It is unclear whether the requirement with the Program is to maintain at least 12 hours of auxiliary backup power over the life of the asset, given that batteries typically deteriorate over time. This should be made clear in the Guidelines and assessed.

It is noted that \$10 million from this Mobile Black Spot Program has been allocated to a total \$18 million program to upgrade the power supply to base stations funded under Rounds 1 and 2 of the program to improve the resilience (batteries and diesel generators) of regional and remote mobile phone base stations. It is not clear whether this is sufficient funding to strengthen the resilience of all mobile base stations in regional and remote areas.

The need for more reliable mobile telecommunications has become more acute since the transition to the National Broadband Network, as landline phone services are now also dependent on reliable power supply.

For enquiries please contact Ian Duncan, Executive Manager Infrastructure on 08 9213 2031 or at iduncan@walga.asn.au.

Yours sincerely



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