~~PROTECTED: Sensitive~~

IMCR – Assessment Summary - Telstra

Wool Bay - TLS-IMCR-036-A - Wool Bay - SA

Proposed solution information:

Coverage solution	**Improving Mobile Coverage solution**	
Eligibility	**Yes**	
Coordinates:	s47G(1)(a), s47G(1)(b)	

Costs (GST inc)		**Infrastructure**	
Commonwealth	s47G(1)(a), s47G(1)(b)	***Type of solution***	4G/5G macrocell
Applicant		***Co-location***	Co-location A site
State/Third party		***Green/brownfield***	Greenfield
Capital costs		***Backhaul type***	Fibre
Operational costs		***Auxiliary power***	12 hour battery backup
Total cost		***Part of cluster?***	Yes
		Dependency details	Sharing Core s47G(1)(a), s47G(1)(b)

s22(1)(a)(ii)

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s22(1)(a)(ii)



6

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s22(1)(a)(ii)

[redacted]

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Acquisition, Approvals and Access Completion or **AAA Completion** means the obtaining, by the Grant Recipient or a Recipient Group Entity, of all necessary Approvals and agreements to enable construction of an Asset to commence at a Site. This includes the Grant Recipient or a Recipient Group Entity having:

a. acquired all necessary rights to the use of the land where the Asset will be located (for example: signed lease arrangement; land purchase; or a right of use agreement);

b. received all necessary local, Commonwealth and State or Territory (as the case requires) approvals required to commence construction of the Asset at the Site;

c. access to the Site, including access to necessary supporting infrastructure (power and backhaul) at the Site, or all necessary approvals required to construct the necessary supporting infrastructure to the Site; and

d. either

   i. approval from the relevant power authority for power to be connected to the Site; or

   ii. requested in writing (including email), a quotation from the relevant power authority for the connection of power to a specific Site together with written confirmation from the Grant Recipient's or a Recipient Group Entity's project delivery manager that the Grant Recipient or Recipient Group Entity has determined to commence construction of the Asset at the Site based on the request for quotation (i.e. before that approval is obtained).

Acquisition, Approvals and Access Payment or **AAA Payment** means the amount of Funds set out in Table 1 of Schedule 2, which corresponds to the achievement of Acquisition, Approvals and Access Completion for an

Asset, payable in accordance with this Agreement.

s22(1)(a)(ii)

Approval means any approval, power, consent, licence or permit, and conditions attaching to any of them (as applicable) by any government, administrative or judicial body, department, tribunal, agency or entity, including any renewal of, or variation to, any of them.

s22(1)(a)(ii)

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s22(1)(a)(ii)

Backhaul means a link between the core or backbone of a network and sub-networks, transporting data from a series of disparate locations to a more centralised location.

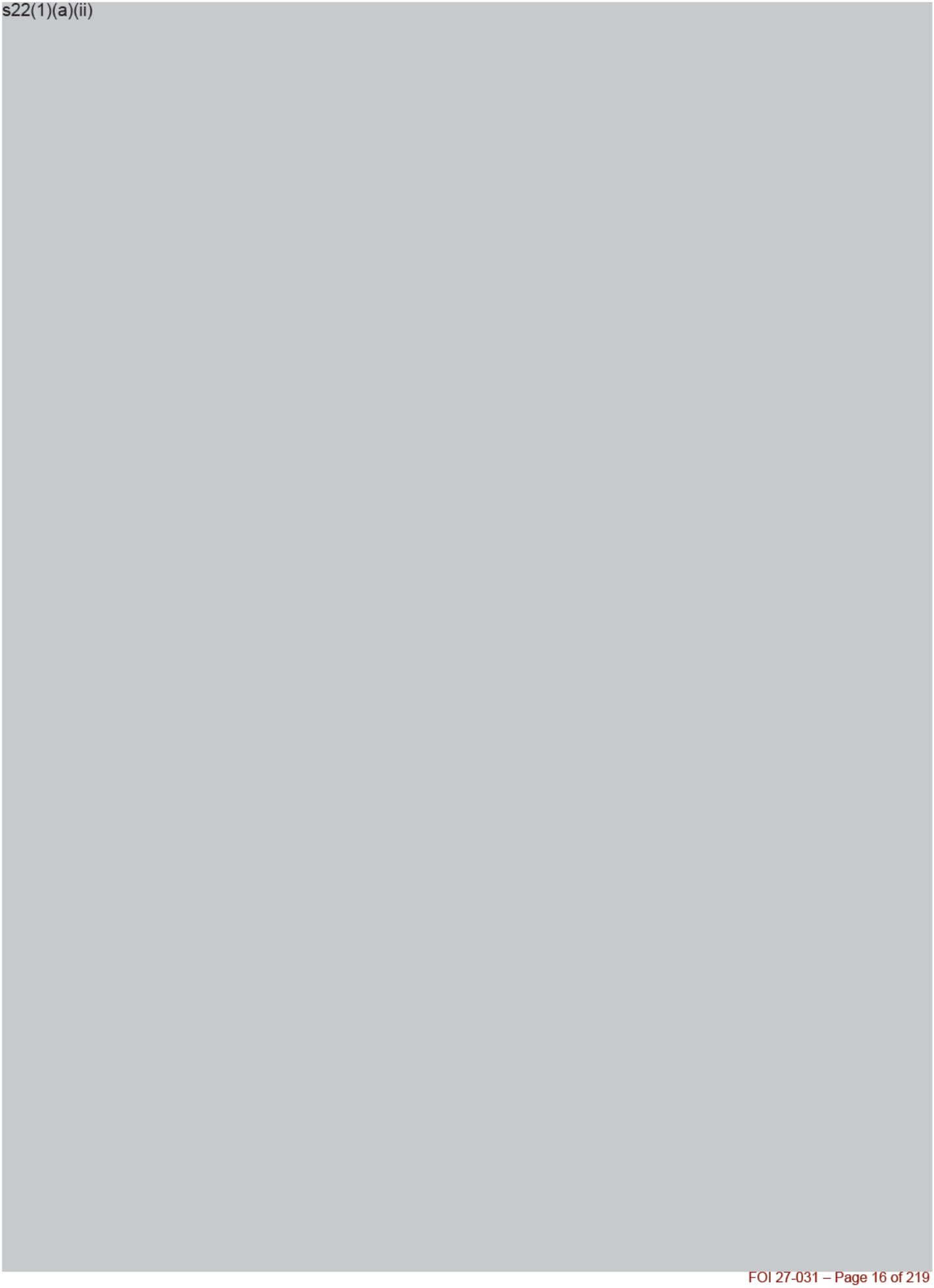
s22(1)(a)(ii)

Certification of Acquisition, Approvals and Access Completion or **Certification of AAA Completion** means certification in writing, by the Grant Recipient's project delivery manager, that the

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Asset/s have achieved Acquisition, Approvals and Access Completion.

s22(1)(a)(ii)



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s22(1)(a)(ii)

Grant Recipient's Network means:

a. the Network Infrastructure (including any active transmission assets) used to provide the Retail Mobile Services and Services;

b. the Assets; and

c. any other assets owned or controlled by the Grant Recipient and used to provide the Retail Mobile Services and Services, including any associated leases, licences or other rights of use or access to Sites, and any associated Intellectual Property Rights.

s22(1)(a)(ii)

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s22(1)(a)(ii)

Laws means:

a. legislation of the Commonwealth, the State(s) and Territory(s) in which the Activity will be undertaken, and any other relevant State or Territory;

b. ordinances, regulations, by-laws, orders and proclamations or other instruments of mandatory legal effect made under those Acts referred to in paragraph a.;

c. mandatory directions by any person exercising statutory powers regarding the Activity;

d. all the mandatory requirements and standards of a government department, authority, agency or regulatory body that apply in respect of the building or construction industry in any State or Territory where the Activity is carried out.

s22(1)(a)(ii)

. **Mobile Network Operators** or **MNOs** means a company that:

a. supplies or proposes to supply a public mobile telecommunications service within the meaning of the *Telecommunications Act 1997* (Cth); and

b. holds an apparatus or a spectrum licence (or both) for the supply of public mobile telecommunications services under the *Radiocommunications Act 1992* (Cth).

s22(1)(a)(ii)

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s22(1)(a)(ii)

Total Funding Amount means the sum of the Total Capital Cost Funding Amount and the Total Operational Cost Funding Amount, which may not exceed the aggregate of the Funding Caps for the Assets.

s22(1)(a)(ii)

Variation means:

a. during the Rollout Period, for each Asset:

   i. any addition, decrease, omission, deletion or removal to or from the Funded Solution that will or may affect the Grant Recipient's ability to provide the Coverage; or

   ii. any design or technical change that will or may affect the Grant Recipient's ability to meet the Specifications;

b. during the Operational Period for each Asset, any change that will or may affect the Services or the scope of such services, including any change that will or may affect the Grant Recipient's ability to provide the Coverage; or

c. any other change that will or may impact on the Commonwealth's achievements of the Objectives,

but does not include the development and refinement of the Design Documents in accordance with clause 4.3 or the maintenance or refurbishment of the Asset or replacement of any items of plant or equipment required to deliver the Retail Mobile Services and Services in accordance with this Agreement, or any change in the construction of an Asset in accordance with industry practice.

s22(1)(a)(ii)

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s22(1)(a)(ii)

3.1. General requirements

3.1.1. The Grant Recipient must ensure:

a. performance and completion of the Activity (either by the Grant Recipient or another Recipient Group Entity) in accordance with:

i. all applicable Laws; and

ii. this Agreement;

b. performance of its obligations under this Agreement so as to assist the Commonwealth to achieve the Objectives; and

c. that the Rollout is carried out within the Rollout Period in accordance with clause 4.

s22(1)(a)(ii)

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s22(1)(a)(ii)

4.5. Other Variations to Schedule 2

4.5.1. Subject to clause 4.5.2, the Grant Recipient may change the location of a Site or an Asset during the Rollout Period without Notifying the Commonwealth or obtaining the Commonwealth's prior approval provided that there is no:

a. change to the Target Location; or

b. reduction in the original coverage set out in Item 3 of Table 1 of Schedule 2 (Coverage).

s22(1)(a)(ii)

4.5.3. If the Grant Recipient determines that any other changes are required to Table 1 of Schedule 2 for an Asset that has not reached Asset Completion, that may involve any decrease in Coverage from that specified in Item 3 of Table 1 of Schedule 2 the Grant Recipient must provide a Variation Proposal to the Commonwealth in the form set out in Schedule 8 which sets out the:

a. changes proposed to Table 1 of Schedule 2;

b. reasons for the change and evidence in support of those reasons; and

c. steps taken or proposed to be taken by the Grant Recipient to mitigate the issue.

s22(1)(a)(ii)

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s22(1)(a)(ii)

[redacted]

6.1. Site risks

6.1.1. As between the Commonwealth and the Grant Recipient, the Grant Recipient accepts sole responsibility for, and assumes the risk of, all Loss arising out of or in connection with the nature, characteristics and physical conditions of a Site, including:

a. all contamination in, under or around a Site and the removal of any contamination from a Site;

b. any non-standard soil or subsurface conditions; and

c. environmental, heritage, native title and geotechnical risks in connection with a Site.

6.1.2. The Grant Recipient will be responsible for, at its own cost:

a. felling and lopping of trees, clearing and removing vegetation and undergrowth, and undertaking any required excavations or other land surface preparations;

b. erecting temporary workshops, sheds and other buildings and erecting fencing or other security; and

c. installing any services, including water, electricity, gas, fuel, telephone, drainage, sewerage, fibre optic cable and electronic communication services,

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to the extent necessary to perform the Activity and the Commonwealth is not liable for, or in connection with, any claim arising out of or in connection with, the nature, characteristics and physical conditions of a Site or the environment.

6.1.3. The Grant Recipient must, in performing the Activity:

a. not bring on to, or produce any contaminants, pollution or other hazardous materials, or otherwise cause contamination, other than as required for the Activity and compliance with relevant Laws; and

b. make good any contamination caused or contributed to by the Grant Recipient on a Site, or arising out of or in any way in connection with the Activity.

6.1.4. Where the Commonwealth owns or is in control of a Site, the Parties will enter into separate arrangements for that Site that will include provisions governing Commonwealth Liability for the risks.

6.2. Access to Sites

6.2.1. The Grant Recipient is solely responsible for procuring each Site and obtaining access to and from a Site as required to perform the Activity (including any Approvals required for such Access) and the Commonwealth is not liable for, or in connection with any claim arising out of or in connection with, any failure to obtain access to a Site or delay in accessing a Site.

s22(1)(a)(ii)



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s22(1)(a)(ii)

8. Specific Warranties

8.1.1. The Grant Recipient warrants to the Commonwealth on the Date of this Agreement and each date that it lodges a Payment Claim under clause 9.1 :

a. the Grant Recipient (or a Recipient Group Entity) can and will provide the Retail Mobile Services and Services in accordance with this Agreement;

b. subject to clause 4.4 the Grant Recipient (or a Recipient Group Entity) can and will obtain any licences, Approvals, permissions, powers or consents necessary for fulfilling its obligations under this Agreement;

c. the Grant Recipient currently complies with, and will continue to comply with, any applicable Laws in all material respects, and Health and Safety Laws in all respects;

d. the design of the Assets will be Fit for Purpose; and

e. the Rollout will:

i. upon Asset Completion and Rollout Completion, be Fit for Purpose; and

ii. remain at all times Fit for Purpose; and

f. any work undertaken on the Core Environment using any Funding is necessary for the provision of the Services or Retail Mobile Services at a Site and that any benefits flowing to other parts of the Grant Recipient's (or a Recipient Group Entity's) networks or services are consequential.

8.1.2. The Grant Recipient warrants to the Commonwealth on the date of this Agreement that the Grant Recipient's project delivery manager is authorised to provide certification and sign-off under this Agreement and makes further warranties of these matters on each date that the project delivery manager does so.

9. Payment

9.1. Payment of Funding

s22(1)(a)(ii)

9.1.2. Subject to this clause 9, the Commonwealth will provide the Grant Recipient with the Funding in staged payments as follows:

s22(1)(a)(ii)

b. a quarterly payment comprising the total of all of the AAA Payments for each Asset that has achieved AAA Completion in the previous quarter (***Quarterly Payment***) subject to the Grant Recipient providing Certification of AAA Completion and a Tax Invoice for the relevant Asset/s that have achieved AAA Completion in the previous quarter;

s22(1)(a)(ii)

s22(1)(a)(ii)

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s22(1)(a)(ii)

9.1.8. Any payment of Funds under this Agreement is not:

a. evidence of the value of work or that work has been satisfactorily carried out in accordance with this Agreement;

b. an admission of liability; or

c. approval by the Commonwealth of the Grant Recipient's performance or compliance with this Agreement,

and the payment is only to be taken as payment on account.

s22(1)(a)(ii)

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9.6. Limitations on Funding

9.6.1. The maximum amount of Funds payable by the Commonwealth under this Agreement is limited to the Total Funding Amount. The Commonwealth is not responsible for the provision of additional money to meet any Actual Asset Capital Costs or any other costs related to the Activity in excess of the Total Funding Amount.

9.6.2. The Grant Recipient must, in respect of an Asset, only use the Funding to pay for the Actual Asset Capital Costs and the Asset Operational Costs.

9.6.3. The Grant Recipient acknowledges that:

a. the Funding payable under this Agreement is intended to meet, in respect of each Asset, some but not all of the Grant Recipient's Actual Asset Capital Costs and Actual Asset Operational Costs; and

b. the Grant Recipient is solely responsible for, and must contribute or arrange for the contribution of all amounts in addition to the Total Funding Amount which are necessary to complete the Rollout and provide the Services, as set out in clause 10.

s22(1)(a)(ii)



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s22(1)(a)(ii)

11. Assets

11.1. Acquisition of Assets

11.1.1. The Commonwealth acknowledges that the Grant Recipient will use the Funding (excluding the Asset Operational Cost Payments) to acquire Assets (including Network Infrastructure) and that those Assets will be owned by the Grant Recipient or another Recipient Group Entity.

11.2. Terms applicable to Asset

11.2.1. During the Operational Period, the Grant Recipient must use (or ensure that a Recipient Group Entity will use) any Asset acquired or built with the Funds in accordance with this Agreement and for the purposes of the Activity and the provision of the Services to the extent that any other MNO elects to participate, on applicable sites in accordance with clause 7.2.1) and Retail Mobile Services.

s22(1)(a)(ii)

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s22(1)(a)(ii)

29.5. Approvals

29.5.1. The Grant Recipient must, at its own cost:

a. obtain all Approvals which are necessary for the performance of the Activity;

b. do all things necessary to keep such Approvals valid and effective, including renewing, extending or amending such Approvals when necessary; and

c. provide evidence to the Commonwealth that the Grant Recipient has obtained and continues to maintain all such Approvals if reasonably requested by the Commonwealth at any time.

s22(1)(a)(ii)

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s22(1)(a)(ii)

MBSP6-SA-004	Wool Bay	TLS-IMCR-036-A	s47G(1)(a), s47G(1)(b)	Wool Bay	08/2026

s22(1)(a)(ii)

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s22(1)(a)(ii)

MBSP6-SA-004	Wool Bay	s47G(1)(a), s47G(1)(b)	Wool Bay	Improving Mobile Coverage	12	N	1	35	Macro	F	s47G(1)(a), s47G(1)(b)	N/A

s22(1)(a)(ii)

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s22(1)(a)(ii)

MBSP6-SA-004	s47G(1)(a), s47G(1)(b)

s22(1)(a)(ii)

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s47F
Sent: Friday, 23 January 2026 5:31 PM
To: s22(1)(a)(ii)
Cc: s22(1)(a)(ii) s47F
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]
Attachments: MBSP6-SA-004-Wool Bay- AAA Certification.docx

OFFICIAL

Hi s22(1)(a)(ii)

Please find attached the AAA Declaration for Wool Bay MBSP6-SA-004.

s47G(1)(a), s47G(1)(b) Confirming metrics have been met.

Please advise if approved and I will organise for the invoice to be generated.

This has also been uploaded into Govteams.

Kind Regards

s47F
Network Technical - Specialist
Commercial Program Office
Global Networks & Technology
Telstra Limited

M s47F
E
W www.telstra.com

Telstra recognises and acknowledges the existing, original, and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands and waterways across the Australian continent. We pay our respects to their Elders past and present.
This email may contain confidential information.
If I've sent it to you by accident, please delete it immediately.

General

OFFICIAL

s22(1)(a)(ii)

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

23 January 2026

Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts
GPO Box 2154,
Canberra,
ACT 2601

Attention: s22(1)(a)(ii) – Director, Mobile Programs Implementation

Mobile Black Spot Program – Round 6 – Certification of Approvals

We refer to:

(a) **1.1 - Defined terms** of the Funding Agreement.

I hereby declare that the sites listed below have achieved the 'AAA' status in accordance with the defined terms of the Funding Agreement.

s47G(1)(a), s47G(1)(b)

This notice has been submitted in accordance with s47G(1)(a), s47G(1)(b)

Yours faithfully

s47F

Program Lead – Co-Investment Program
Commercial Program Office
Commercial Engineering, Global Networks & Technology, Telstra Limited

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s22(1)(a)(ii)

From: s47F
Sent: Wednesday, 18 March 2026 4:29 PM
To: s22(1)(a)(ii) s47F s22(1)(a)(ii)
Cc: s22(1)(a)(ii) s47F
Subject: RE: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]
Attachments: IMCR-MBSP6-SA-004-Wool Bay Schedule 8 Variation 2.pdf

OFFICIAL

Hi s22(1)(a)

Please find attached variation for review and approval.

Thanks

Regards



s47F
Technical Project Specialist

Commercial Program Office
Commercial Engineering, Global Networks & Technology
s47F

www.telstra.com

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If I've sent it to you by accident, please delete it immediately.

s47F

General

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Wednesday, 18 March 2026 9:31 AM
To: s47F s22(1)(a)(ii) @infrastructure.gov.au>; s47F s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F s47F
Subject: RE: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

[External Email] This email was sent from outside the organisation – be cautious, particularly with links and attachments.

OFFICIAL

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Hi s47F

Thank you for providing details on the coverage metrics for Wool Bay – MBSP6-SA-004 as part of the AAA declaration.

According to the information below, as there is a s47G(1)(a), s47G(1)(b), s47C s47G(1)(a), s47G(1)(b), s47C

Before we can process the AAA payment, s47G(1)(a), s47G(1)(b), s47C s47G(1)(a), s47G(1)(b), s47C

Thanks

s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
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infrastructure.gov.au

I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

OFFICIAL

From: s47F
Sent: M
To: s22(1)(a)(ii) @infrastructure.gov.au>; s47F s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>;s47F s47F
Subject: RE: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

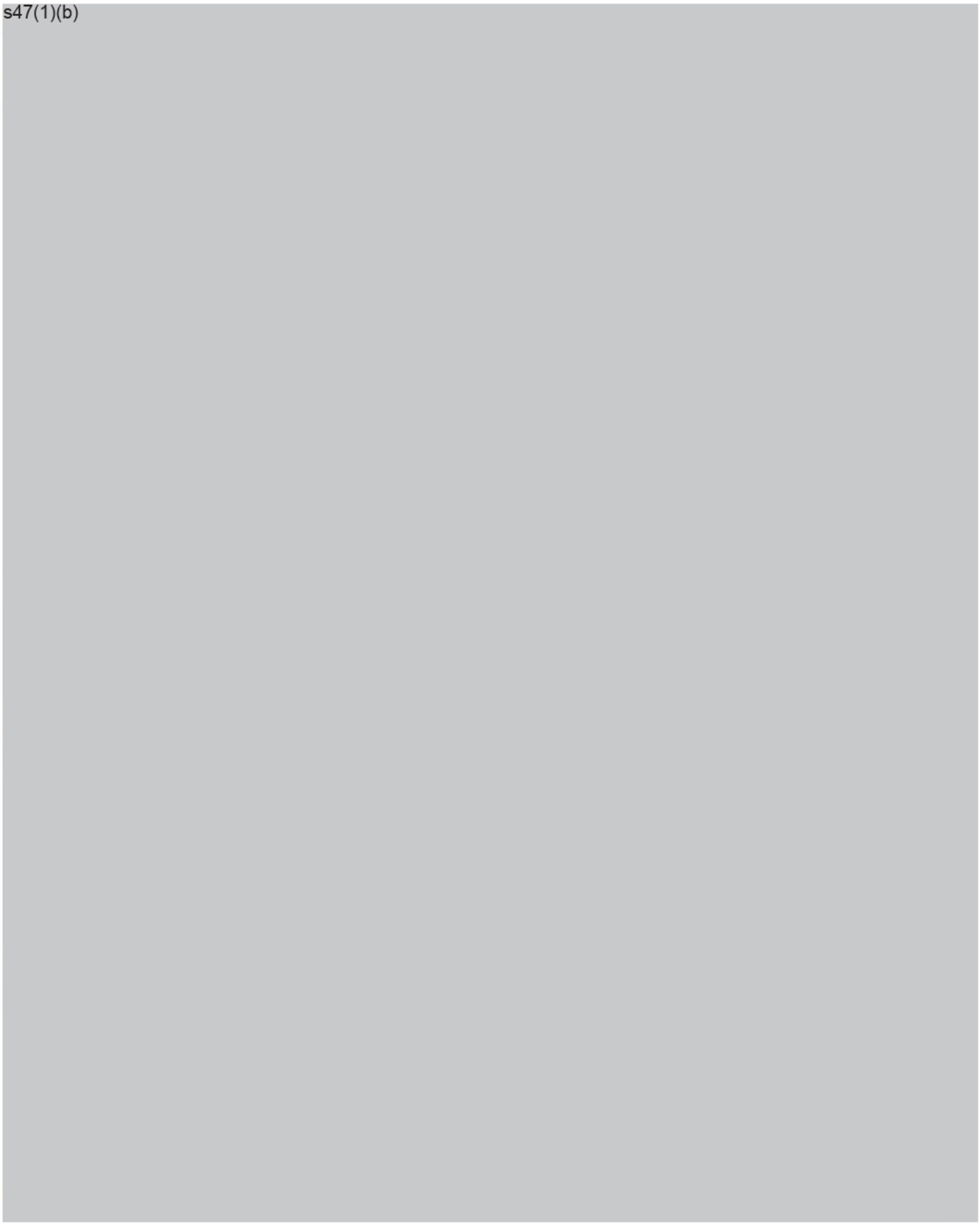
We check with our team and the coverage map and metrics are as follows:

		Tender	FC location
Coverage	**Residences**	s47G(1)(a), s47G(1)	s47G(1)(a), s47G(1
	Square Km's HH		

Tender

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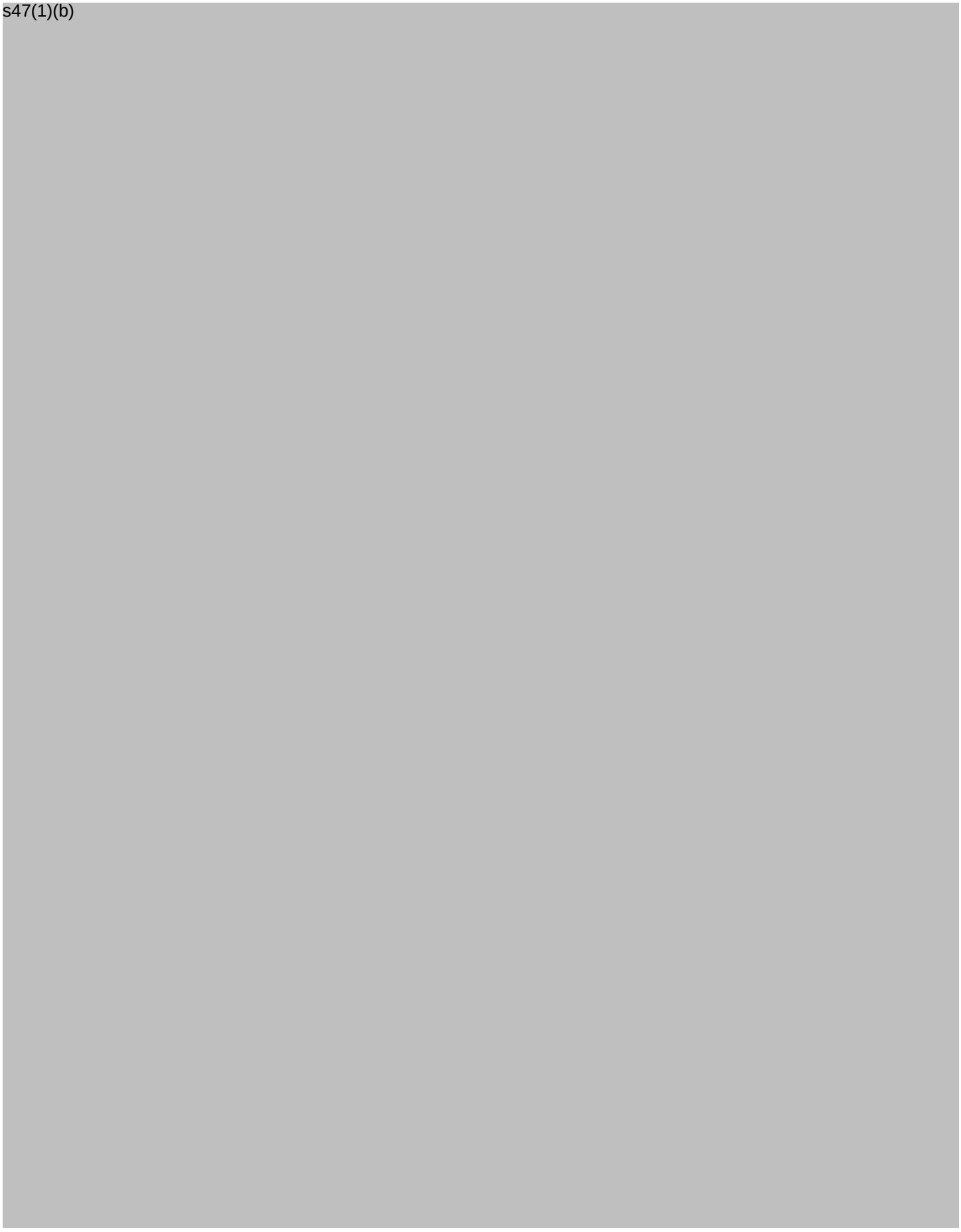
s47(1)(b)



Proposed

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s47(1)(b)



Thanks

Regards

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s47F
Technical Project Specialist
Commercial Program Office
Commercial Engineering, Global Networks & Technology

s47F
www.telstra.com

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s47F

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Tuesday, 27 January 2026 8:41 AM
To: s47F ; s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F
Subject: RE: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

[External Email] This email was sent from outside the organisation – be cautious, particularly with links and attachments.

OFFICIAL

Hi s47F

Thanks so much for sending this through and your confirmation that the Schedule 2 metrics will be met. Are you able to also confirm that the contracted area is still expected to receive coverage?

Kind regards,
s22(1)(a)(ii)

Senior Program Officer • Mobile Programs Implementation
s22(1)(a)(ii)

OFFICIAL

From: s47F
Sent: Friday, 23 January 2026 5:31 PM
To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

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Certification:

Signed for the funding recipient by its authorised representative:

Signature: X s47F

18/03/2026

s47F

Signed by: s47F

Date: 18 / 03 / 2026

Print Name: s47F

Position: Project Manager

Approval:

The variation is: ☐ approved ☐ not approved

Comments:

Approved on behalf of the **Commonwealth**:

Signature: **Date**: / /

Print Name: **Position**:

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s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Tuesday, 24 March 2026 10:14 AM
To: s22(1)(a)(ii)
Cc:
Subject: Wool Bay MBSP6-SA-004 - Variation [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)( )(ii)

An SVR Analysis has been prepared for MBSP6-SA-004 – Wool Bay.

Noting that there is no state government funding for this site.

Could you please review the variation for Wool Bay.

Please see linked below for your review/determination.

Wool Bay - Site Folder
SVR Notice
SVR Analysis

Regards

s22(1)(a)(ii)
Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

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I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

OFFICIAL

From: s47F
Sent: Wednesday, 18 March 2026 4:29 PM
To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>; s47F s22(1)(a)(ii) s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s47F

Subject: RE: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

From: s47F
Sent: Wednesday, 22 April 2026 9:19 AM
To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>; s47F ; s22(1)(a)(ii) s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F s47F
Subject: RE: Variation - Wool Bay - MBSP6-SA-004 [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

s47G(1)(a), s47G(1)(b)

Thanks
Regards

s47F
Technical Project Specialist
Commercial Program Office
Commercial Engineering, Global Networks & Technology
s47F

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If I've sent it to you by accident, please delete it immediately.
s47F

General

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Monday, 30 March 2026 2:22 PM
To: s47F ; s22(1)(a)(ii) @infrastructure.gov.au>; s47F s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F s47F
Subject: Variation - Wool Bay - MBSP6-SA-004 [SEC=OFFICIAL]

[External Email] This email was sent from outside the organisation – be cautious, particularly with links and attachments.

OFFICIAL

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Hi s47F

s47G(1)(a), s47G(1)(b), s47C

Thank you again for your cooperation. I look forward to your response.

Regards,

s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
CONNECTING AUSTRALIANS • ENRICHING COMMUNITIES • EMPOWERING REGIONS

infrastructure.gov.au

I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

OFFICIAL

From: s47F
Sent: Wednesday, 18 March 2026 4:29 PM
To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>; s47F s22(1)(a)(ii) s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F s47F
Subject: RE: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Thursday, 7 May 2026 4:49 PM
To: s22(1)(a)(ii)
Cc:
Subject: Re: FOR APPROVAL - SVR - Wool Bay [SEC=OFFICIAL]
Attachments: DF MBSP6-SA-004 - Wool Bay - SVR2.pdf

OFFICIAL

Hi, reviewed and approved.

Cheers

s22(1)(a)(ii)
s22(1)(a)(ii) • Mobile Programs Implementation • Regional Mobile Infrastructure Programs Branch
s22(1)(a) @infrastructure.gov.au s22(1)(a)(ii)

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Monday, 4 May 2026 16:16
To: s22(1)(a)(ii) @infrastructure.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>
Subject: FOR APPROVAL - SVR - Wool Bay [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)

SVR for your approval

A Site Variation Request has been lodged by Telstra for MBSP site Wool Bay. An analysis has been prepared and is ready for your review (with thanks to s22(1)(a)(ii)

SITE FOLDER
SVR FORM – Attached for signature
SVR ANALYSIS – Linked for acknowledgement/signature

Kind regards,

s22(1)(a)(ii)
Senior Program Officer • Mobile Programs Implementation
Regional Mobile Infrastructure Programs Branch • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)
GPO Box 594 Canberra, ACT 2601

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Certification:

Signed for the funding recipient by its authorised representative:

Signature: X s47F 18/03/2026

s47F

Signed by: s47F

Date: 18 / 03 / 2026

Print Name: s47F

Position: Project Manager

Approval:

The variation is: ☐ approved ☐ not approved

s47G(1)(a), s47G(1)(b)

Approved on behalf of the **Commonwealth**:

Signature: s47F

Date: / /

Print Name: s47F

Position:

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s47F
Sent: Friday, 8 May 2026 3:17 PM
To: s22(1)(a)(ii)
Cc: s22(1)(a)(ii) s47F s22(1)(a)(ii) s47F
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]
Attachments: MBSP6-SA-004-Wool Bay- AAA Certification.2.docx

Hi s22(1)(a)(ii)

Due to variation now being approved please find attached the updated AAA Declaration for Wool Bay MBSP6-SA-004.

This has also been uploaded into Govteams.

Kind Regards

s47F
Network Technical - Specialist
Commercial Program Office
Global Networks & Technology
Telstra Limited

s47F

W www.telstra.com

Telstra recognises and acknowledges the existing, original, and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands and waterways across the Australian continent. We pay our respects to their Elders past and present.
This email may contain confidential information.
If I've sent it to you by accident, please delete it immediately.

General

From: s47F
Sent: Friday, January 23, 2026 5:31 PM
To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

8 May 2026

Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts
GPO Box 2154,
Canberra,
ACT 2601

Attention: s22(1)(a)(ii) – Director, Mobile Programs Implementation

Mobile Black Spot Program – Round 6 – Certification of Approvals

We refer to:

(a) **1.1 - Defined terms** of the Funding Agreement.

I hereby declare that the sites listed below have achieved the 'AAA' status in accordance with the defined terms of the Funding Agreement.

s47G(1)(a), s47G(1)(b)

Yours faithfully

s47F

Program Lead – Co-Investment Program
Commercial Program Office
Commercial Engineering, Global Networks & Technology, Telstra Limited

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s47F
Sent: Monday, 11 May 2026 11:53 AM
To: s22(1)(a)(ii)
Cc: s22(1)(a)(ii) s47F s22(1)(a)(ii) s47F
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]
Attachments: MBSP6-SA-004-Wool Bay- AAA Certification.docx

Hi s22(1)(a)

As discussed please find updated AAA declaration for Wool Bay MBSP6-SA-004 showing correct details.

This has also been uploaded into Govteams.

Kind Regards

s47F
Network Technical - Specialist
Commercial Program Office
Global Networks & Technology
Telstra Limited

s47F

W www.telstra.com

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This email may contain confidential information.
If I've sent it to you by accident, please delete it immediately.

From: s47F
Sent: Friday, May 08, 2026 3:17 PM
To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F s47F ; s22(1)(a)(ii) @infrastructure.gov.au>; s47F s47F
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

11 May 2026

Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts
GPO Box 2154,
Canberra,
ACT 2601

Attention: s22(1)(a)(ii) – Director, Mobile Programs Implementation

Mobile Black Spot Program – Round 6 – Certification of Approvals

We refer to:

(a) **1.1 - Defined terms** of the Funding Agreement.

I hereby declare that the sites listed below have achieved the 'AAA' status in accordance with the defined terms of the Funding Agreement.

s47G(1)(a), s47G(1)(b)

Yours faithfully

s47F

Program Lead – Co-Investment Program
Commercial Program Office
Commercial Engineering, Global Networks & Technology, Telstra Limited

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Wednesday, 13 May 2026 2:45 PM
To: s22(1)(a)(ii)
Cc:
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

OFFICIAL

Thanks s22(1)(a)(ii) AAA payment approved.

s47C

Cheers

s22(1)(a)(ii)

OFFICIAL

From: s22(1)(a)(ii)@infrastructure.gov.au>
Sent: Monday, 11 May 2026 15:46
To: s22(1)(a)(ii)@communications.gov.au>
Cc: s22(1)(a)(ii)@infrastructure.gov.au>
Subject: FW: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

s47C

Regards

s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) infrastructure.gov.au s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

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infrastructure.gov.au

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OFFICIAL

From: s47F

Sent: Monday, 11 May 2026 11:53 AM

To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>

Cc: s22(1)(a)(ii) @communications.gov.au>; s47F s22(1)(a)(ii) @infrastructure.gov.au>; s47F

Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

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Mobile Black Spot Program – AAA Payment Approval

Telstra
MBSP6-SA-004 – Wool Bay
s47G(1)(a), s47G(1)(b)

Assessment

I, s22(1)(a)(ii) *Program Officer,* confirm that Certification of Acquisition, Approvals and Access Completion for the above base station, in accordance with the requirements in the relevant funding agreement, has been provided by the Funding Recipient. I recommend AAA Payment for this base station be approved.

Signed: s22(1)(a)(ii) Date: 11/5/2026

Approval

I, s22(1)(a)(ii) *EL1 Assistant Director,* certify that I have the appropriate financial delegation in accordance with the *Instrument of Financial Delegations (No. 1) 2026* to approve payment of s47G(1)(a), s47G(1)(b)

s22(1)(a)(ii)

Signed: s22(1)(a)(ii) Date: 13/05/2026

s47G(1)(a), s47G(1)(b)

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Mobile Black Spot Program – AAA Payment Approval

s47G(1)(a), s47G(1)(b)

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s47F
Sent: Wednesday, 13 May 2026 4:58 PM
To: s22(1)(a)(ii)
Cc: s22(1)(a)(ii) s47F s22(1)(a)(ii) s47F ; s22(1)(a)(ii)
Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 invoice [SEC=OFFICIAL]
Attachments: AAA invoice - Wool Bay - MBSP6-SA-004.pdf

Thank you s22(1)(a)(ii)

Please find attached the Site Acquisition invoice for Wool Bay MBSP6-SA-004.

This has also been uploaded into Govteams.

Kind Regards

s47F
Network Technical - Specialist
Commercial Program Office
Global Networks & Technology
Telstra Limited

s47F
W www.telstra.com

Telstra recognises and acknowledges the existing, original, and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands and waterways across the Australian continent. We pay our respects to their Elders past and present.
This email may contain confidential information.
If I've sent it to you by accident, please delete it immediately.

General

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Wednesday, May 13, 2026 4:38 PM
To: s47F ; s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @communications.gov.au>; s47F
s22(1)(a)(ii) @infrastructure.gov.au>; s47F
Subject: RE: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

[External Email] This email was sent from outside the organisation – be cautious, particularly with links and attachments.

OFFICIAL

Hi s47F

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Please be advised that the Department has reviewed and accepted AAA documentation for Wool Bay (MBSP6-SA-004). In line with this, could Telstra please issue the associated milestone payment invoice.

Regards

s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
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infrastructure.gov.au

I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
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I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

OFFICIAL

From: s47F

Sent: Friday, 8 May 2026 3:17 PM

To: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>

Cc: s22(1)(a)(ii) @communications.gov.au>; s47F
s22(1)(a)(ii) @infrastructure.gov.au>; s47F

Subject: Re: AAA Declaration - Wool Bay MBSP6-SA-004 [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

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FOI 27-031 – Document 13 Attachment A

IT'S HOW WE CONNECT

Account Number	s47G(1)
Tax Invoice Issued	13 May 2026
Your Reference	s47G(1)(a), s47G(1)(b)
Bill Number	

Telstra Limited ABN 64 086 174 781

TAX INVOICE FOR

Department of Infrastructure, Transport,
Regional Development, Communications,
Sports and the Arts (ABN 86 267 354 017)
GPO Box 594
Canberra ACT 2601

s47G(1)(a), s47G(1)(b)

DUE BY 13 June 2026

ACCOUNT ACTIVITY

	GST Exclusive	GST Inclusive
Previous Balance		$0.00
We Received		$0.00
Adjustments		$0.00
Balance		$0.00

s47G(1)(a), s47G(1)(b)

GST Adjustments	*$0.00*
GST Free Charges Included in New Charges	*$0.00*

ENQUIRIES

Billing or service enquiries: 1800 243 808
(Mon to Fri 8:30am to 5:00pm)

Email: s47G(1)(a), s47G(1)(b)

Fault reporting 24 hours: 13 22 55

Internet: www.telstra.com

HOW TO PAY

Use BPAY® to pay fee-free from your cheque or savings account. Go online or use phone banking.

BPAY **Biller Code:** 214189 **Ref:** 045468563

Telephone & Internet Banking – BPAY®
Contact your bank or financial institution to make this payment from your cheque, savings, debit or transaction account.
More info: www.bpay.com.au

Post

Post this payment slip with cheque made payable to **Telstra, GPO BOX 9901, Melbourne VIC 3001**

Electronic Funds Transfer

To register for electronic funds transfer please contact the EFT team at eft@team.telstra.com. Once you have made payment please email your remittance advice to eft@team.telstra.com

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s47G(1)(a), s47G(1)(b)

INVOICE SUMMARY

Description	*Volume*	*$ Excl GST*	*$ Incl GST*
Mobile Blackspot Programme			
Site ID - MBSP6-SA-004 - Wool Bay Site Acquisition Contribution s47G(1)(a), s47G(1)(b)	1	s47G(1)(a), s47G(1)(b)	
Total for Mobile Blackspot Programme			
Total New Charges			

Please return this section with your payment

Department of Infrastructure, Transport,

Account Number s47G(1)(a), s47G(1)(b)
Your Reference Number
Bill Number

Total (AUD) s47G(1)(a), s47G(1)(b)
Pay by 13 June 2026

Turn over for how to pay

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s47G(1)(a), s47G(1)(b)

IMPORTANT MESSAGES

To meet legal obligations we need you to forward a copy of your remittance details to eft@team.telstra.com on the same day the deposit is made.

Details to include are account number, bill number and payment amount deposited.

Telstra's bank account details are:
Commonwealth Bank of Australia
Melbourne VIC 3000
Telstra Limited
s47G(1)(a), s47G(1)(b)

National Relay Service (NRS)
If you're Deaf, hard of hearing, or have a speech or communication difficulty, first, choose your NRS access option. Next, tell the relay officer our number: 1800 243 808.

For information about the NRS, visit www.accesshub.gov.au, call 1800 555 600 or text 04 16 001 350.

Call us in your language

Interpreter Service 1800 241 600

خدمات الترجمة الفورية | Servicios de interpretación | ਦੁਭਾਸ਼ੀਏ ਸੇਵਾਵਾਂ | 口譯服務 | 口译服务 | Dịch vụ phiên dịch

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s22(1)(a)(ii)

From: s22(1)(a)(ii) infrastructure.gov.au>
Sent: Wednesday, 20 May 2026 1:48 PM
To: s22(1)(a)(ii)
Cc: s22(1)(a)(ii)
Subject: FW: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra)
Attachments: WhatsApp Image 2026-03-20 at 9.16.48 AM.jpeg; WhatsApp Image 2026-03-19 at 12.44.37 PM.jpeg; WhatsApp Image 2026-03-19 at 12.14.04 PM (3).jpeg

Hi s22(1)(a)(ii)

Hope your day is going well.

This complaint came through to the MBSP inbox today.

As it sounds like it is referring to a contracted site s22(1)(a)(ii) has suggested I forward it to you.

If you need anything else from our team, please let us know.

Thanks s22(1)(a)(ii)

s22(1)(a)(ii)

From: s11C(1)(a)
Sent: Wednesday, 20 May 2026 6:57 AM
To: MBSP <MBSP@infrastructure.gov.au>
Cc: Venning, Tom (MP Office) <tom.venning.mp@aph.gov.au>; nvc@sa.gov.au
Subject: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra)

> You don't often get email from s11C(1)(a) earn why this is important

Dear Director,

I am writing to formally lodge a complaint regarding a severe, non-disclosed project variation and potential breach of grant conditions under the Mobile Black Spot Program (MBSP) for the mobile base station upgrade at **Wool Bay, South Australia**.

As a local stakeholder, I have identified a profound departure from the approved project scope by the funding grantee, Telstra. This variation raises critical questions regarding the project's adherence to the **Commonwealth Grants Rules and Guidelines (CGRGs)**, specifically concerning transparency, scoping accuracy, and the "value for money" criteria upon which federal funding was originally awarded.

1. Background and Material Scope Deviation

Under the approved parameters outlined during the initial planning phase and the respective Development Application (DA), the Wool Bay project was scoped as a low-impact, localized infrastructure upgrade.

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- **The Original Scope:** The project documentation indicated that backhaul/data connectivity would be sourced locally from existing networks, requiring **less than 300 metres** of connection and civil works.

- **The Current Reality:** Telstra has unilaterally expanded the civil works component to include **8 kilometres of heavy trenching** along the St Vincent Highway.

This represents an unprecedented **3,000% expansion of the physical footprint of civil works** compared to the original submission. This massive scope variation was never disclosed to the community, nor is there any evidence it was transparently disclosed to or re-assessed by the Department prior to the commencement of works.

2. Core Compliance and Grant Violations

I request that the Department investigate whether Telstra's actions constitute a direct breach of MBSP Grant Opportunity Guidelines on the following grounds:

A. Failure of Scoping Integrity and Misleading Application

A variation of this magnitude implies one of two scenarios, both of which violate federal grant standards:

1. **Gross Negligence in Initial Scoping:** Telstra failed to conduct basic engineering due diligence prior to requesting Commonwealth funds, rendering their original application inaccurate.

2. **Intentional "Scope Creep":** The project was intentionally under-scoped in the application phase to bypass strict environmental, financial, and regulatory scrutiny, only to be expanded dramatically once public funds were secured.

B. Violation of "Value for Money" Criteria

MBSP funding is highly competitive and allocated based on cost-effectiveness. Telstra's decision to opt for an resource-heavy, 8km heavy trenching project—rather than utilizing local co-location or alternative local connectivity—completely changes the cost-benefit analysis of this site. Had the true economic and environmental costs of an 8km excavation been disclosed upfront, this project likely would not have met the competitive thresholds for federal funding.

C. Environmental and Regulatory Non-Compliance

The 8km excavation corridor runs directly through protected roadside vegetation corridors containing significant indigenous flora. Because the original DA only accounted for a sub-300m localized footprint, there is a severe risk that this expanded 8km route has not received the mandatory clearances from the **South Australian Native Vegetation Council**. Grantees are strictly required to uphold all state and federal environmental laws as a condition of receiving Commonwealth grants.

3. Formal Requests for Action

To protect the integrity of the Mobile Black Spot Program and safeguard public funds, I urge the Department to take the following immediate steps:

- **Initiate an Immediate Audit:** Conduct a formal compliance audit into the Wool Bay MBSP funding agreement to verify if Telstra's unapproved 3,000% scope variation violates their funding deed.

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- **Issue a Temporary Work Stop Order:** Request an administrative pause on all active trenching along the St Vincent Highway until Telstra provides complete transparency and independent verification of its engineering necessity.
- **Verify Environmental Framework Compliance:** Demand that Telstra produce valid, route-specific clearances from the Native Vegetation Council covering the full 8km trajectory.
- **Review Financial Disbursals:** Ensure that no federal taxpayer funds are being used to subsidize this extended civil infrastructure project if it was not explicitly evaluated and approved in the original grant round.

The community welcomes improved regional connectivity, but it cannot be delivered on the back of deceptive planning, environmental degradation, and the misallocation of federal grant funds.

I look forward to your urgent response and a formal acknowledgment of the commencement of an investigation into this matter.

Yours sincerely,

s11C(1)(a)

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts



Released under the FOI Act by the Department of Infrastructure



Released under the FOI Act by the Department of Communications, Sport and the Arts



Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Wednesday, 20 May 2026 2:02 PM
To: s22(1)(a)(ii)
Cc:
Subject: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]
Attachments: WhatsApp Image 2026-03-20 at 9.16.48 AM.jpeg; WhatsApp Image 2026-03-19 at 12.44.37 PM.jpeg; WhatsApp Image 2026-03-19 at 12.14.04 PM (3).jpeg

OFFICIAL

Hi s22(1)(a)(ii)

Can you please reach out to Telstra ASAP regarding the below complaint. Once we have more information from Telstra, then we can discuss.

Thanks
Cheers

s22(1)(a)(ii)
Director • Mobile Programs Implementation • Regional Mobile Infrastructure Programs Branch
s22(1)(a)(ii)@infrastructure.gov.au s22(1)(a)(ii)

From: s22(1)(a)(ii)@infrastructure.gov.au>
Sent: Wednesday, May 20, 2026 13:47
To: s22(1)(a)(ii)@infrastructure.gov.au>
Cc: s22(1)(a)(ii)@infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii)@communications.gov.au>; s22(1)(a)(ii)@infrastructure.gov.au>
Subject: FW: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

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s22(1)(a)(ii)

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Wednesday, 20 May 2026 2:36 PM
To: s22(1)(a)(ii)
Cc:
Subject: RE: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

Thanks s22(1)(a)(ii) – hope it goes ok 😊

s22(1)(a)(ii)

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Wednesday, 20 May 2026 2:02 PM
To: s22(1)(a)(ii) @infrastructure.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>
Subject: Re: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Thanks s22(1)(a)(ii) we will look into this matter. Cheers s22(1)

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Wednesday, 20 May 2026 13:47
To: s22(1)(a)(ii) @infrastructure.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>
Subject: FW: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Thursday, 21 May 2026 4:44 PM
To: s47F
Cc: s22(1)(a)(ii) s47F
s47F
Subject: Notification of AAA payments - Wool Bay s22(1)(a)(ii) [SEC=OFFICIAL]

OFFICIAL

Hi s47F

I hope all is well with you.

Please be advised that the following AAA payments have been made today (22 May 2026):

- Wool Bay – MBSP6-SA-004
- s22(1)(a)(ii)

Regards,
s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
CONNECTING AUSTRALIANS • ENRICHING COMMUNITIES • EMPOWERING REGIONS

infrastructure.gov.au

I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

OFFICIAL

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s22(1)(a)(ii)

From: s47F
Sent: Tuesday, 26 May 2026 4:34 PM
To: s22(1)(a)(ii)
Cc: s47F
Subject: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]
Attachments: DecisionNotificationForm-Application25009616-12271775.pdf; DecisionNotificationForm-Application25009616-12257897.pdf; DecisionNotificationForm-Application25009616-11782215.pdf; VerificationOutcome-PlanningConsent-Application25009616-10864460.pdf; VerificationOutcome-BuildingConsent-Application25009616-12217584.pdf

OFFICIAL

Hi s22(1)(a)(ii) and team,

Our Fibre installation team is actively reviewing the issues raised in your correspondence regarding the Wool Bay project. They are currently working to verify that all relevant permissions and approvals have been secured for both the completed works and those scheduled to take place. At this stage, we are unable to provide further details or confirm the origin and supporting information behind the various statements made by the plaintiff.

We appreciate your patience as the broader team conducts this review and will keep you updated as soon as we have more substantive information to share.

Regards,

s47F

W www.telstra.com

s47F

This email and any attachments: are confidential; may be protected by privilege; may be subject to copyright of Telstra Limited (ABN 64 086 174 781). If you are not an intended recipient, you must not keep, forward, copy, use, save or rely on this communication and any such action is unauthorised and prohibited. If you have received this communication in error, please reply to this email to notify the sender of its incorrect delivery, and then delete both it and your reply.

General

OFFICIAL

From: s22(1)(a)(ii)@communications.gov.au>
Sent: Monday, May 25, 2026 12:55 PM

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

To: s47F
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>
Subject: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

[External Email] This email was sent from outside the organisation – be cautious, particularly with links and attachments.

OFFICIAL

Hi s47F

Just following up on the below request for information on the Wool Bay, IMCR project.

Are you please able to get back to us as soon as possible as the complaint has come to the department via two separate processes.

Thanks in advance.

Regards

s22(1)(a)(ii)

OFFICIAL

From: s22(1)(a)(ii) @communications.gov.au>
Sent: Wednesday, 20 May 2026 14:48
To: s47F
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>
Subject: Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Afternoon s47F

We have received the below complaint regarding the IMCR project at Wool Bay (MBSP6-SA-004).

s47C, s47G(1)(a), s47G(1)(b)

Thanks in advance.

Regards,

s22(1)(a)(ii)

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

I am writing to formally lodge a complaint regarding a severe, non-disclosed project variation and potential breach of grant conditions under the Mobile Black Spot Program (MBSP) for the mobile base station upgrade at **Wool Bay, South Australia**.

As a local stakeholder, I have identified a profound departure from the approved project scope by the funding grantee, Telstra. This variation raises critical questions regarding the project's adherence to the **Commonwealth Grants Rules and Guidelines (CGRGs)**, specifically concerning transparency, scoping accuracy, and the "value for money" criteria upon which federal funding was originally awarded.

1. Background and Material Scope Deviation

Under the approved parameters outlined during the initial planning phase and the respective Development Application (DA), the Wool Bay project was scoped as a low-impact, localized infrastructure upgrade.

- **The Original Scope:** The project documentation indicated that backhaul/data connectivity would be sourced locally from existing networks, requiring **less than 300 metres** of connection and civil works.

- **The Current Reality:** Telstra has unilaterally expanded the civil works component to include **8 kilometres of heavy trenching** along the St Vincent Highway.

This represents an unprecedented **3,000% expansion of the physical footprint of civil works** compared to the original submission. This massive scope variation was never disclosed to the community, nor is there any evidence it was transparently disclosed to or re-assessed by the Department prior to the commencement of works.

2. Core Compliance and Grant Violations

I request that the Department investigate whether Telstra's actions constitute a direct breach of MBSP Grant Opportunity Guidelines on the following grounds:

A. Failure of Scoping Integrity and Misleading Application

A variation of this magnitude implies one of two scenarios, both of which violate federal grant standards:

1. **Gross Negligence in Initial Scoping:** Telstra failed to conduct basic engineering due diligence prior to requesting Commonwealth funds, rendering their original application inaccurate.

2. **Intentional "Scope Creep":** The project was intentionally under-scoped in the application phase to bypass strict environmental, financial, and regulatory scrutiny, only to be expanded dramatically once public funds were secured.

B. Violation of "Value for Money" Criteria

MBSP funding is highly competitive and allocated based on cost-effectiveness. Telstra's decision to opt for an resource-heavy, 8km heavy trenching project—rather than utilizing local co-location or alternative local connectivity—completely changes the cost-benefit analysis of this site. Had the true economic and environmental costs of an 8km excavation been disclosed upfront, this project likely would not have met the competitive thresholds for federal funding.

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C. Environmental and Regulatory Non-Compliance

The 8km excavation corridor runs directly through protected roadside vegetation corridors containing significant indigenous flora. Because the original DA only accounted for a sub-300m localized footprint, there is a severe risk that this expanded 8km route has not received the mandatory clearances from the **South Australian Native Vegetation Council**. Grantees are strictly required to uphold all state and federal environmental laws as a condition of receiving Commonwealth grants.

3. Formal Requests for Action

To protect the integrity of the Mobile Black Spot Program and safeguard public funds, I urge the Department to take the following immediate steps:

- **Initiate an Immediate Audit:** Conduct a formal compliance audit into the Wool Bay MBSP funding agreement to verify if Telstra's unapproved 3,000% scope variation violates their funding deed.
- **Issue a Temporary Work Stop Order:** Request an administrative pause on all active trenching along the St Vincent Highway until Telstra provides complete transparency and independent verification of its engineering necessity.
- **Verify Environmental Framework Compliance:** Demand that Telstra produce valid, route-specific clearances from the Native Vegetation Council covering the full 8km trajectory.
- **Review Financial Disbursals:** Ensure that no federal taxpayer funds are being used to subsidize this extended civil infrastructure project if it was not explicitly evaluated and approved in the original grant round.

The community welcomes improved regional connectivity, but it cannot be delivered on the back of deceptive planning, environmental degradation, and the misallocation of federal grant funds.

OFFICIAL

OFFICIAL

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Outlook

Re: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

From s22(1)(a)(ii) @communications.gov.au>
Date Thu 2026-05-28 10:33
To s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Cc s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>

OFFICIAL

Legend! Great minds think a like 🙂

OFFICIAL

From: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Sent: Thursday, 28 May 2026 10:32
To: s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>
Subject: RE: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)

Good timing, just working on words for you now. 😊

Kind regards,

s22(1)(a)(ii)
Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
s22(1)(a)(ii) @infrastructure.gov.au

OFFICIAL

From: s22(1)(a)(ii) @communications.gov.au>
Sent: 28 May 2026 10:31
To: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Subject: Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

Hope you are well.

Just following up on the text for the below complaint we received, as discussed on Monday.

Thanks in advance.

Regards

s22(1)(a)(ii)

OFFICIAL

From: s22(1)(a)(ii) @communications.gov.au>
Sent: Monday, 25 May 2026 15:41
To: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>
Subject: Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)( )(ii)

As discussed, please see complaint email regarding a Telstra's MBSP project.

We look for to receiving some standard words for our response.

Thanks in advance,

Regards

s22(1)(a)(ii)

OFFICIAL

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

From: s11C(1)(a)
Sent: Wednesday, 20 May 2026 6:57 AM
To: MBSP <MBSP@infrastructure.gov.au>
Cc: Venning, Tom (MP Office) <tom.venning.mp@aph.gov.au>; nvc@sa.gov.au
Subject: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay

s22(1)(a)(ii) Duplicate email chain

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Tuesday, 2 June 2026 9:17 AM
To: s22(1)(a)(ii)
Subject: RE: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

Thank you so much for the update, it is greatly appreciated.

s22(1)(a)(ii)
Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
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I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

From: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Sent: Tuesday, 2 June 2026 9:13 AM
To: s22(1)(a)(ii) @infrastructure.gov.au>
Subject: RE: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

I have a draft email to s22(1)(a)(ii) with draft words dealing with complaints in with s22. Happy to walk you through them once the email is sent.

Kind regards,

s22(1)(a)(ii)
Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
s22(1)(a)(ii) @infrastructure.gov.au

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: 01 June 2026 15:24
To: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Cc: s22(1)(a)(ii) @communications.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>

Subject: FW: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

I refer to s22(1)(a)(ii) email below and am just following up to see if you have any standard words for our response to the Wool Bay complaint.

Regards

s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

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OFFICIAL

From: s22(1)(a)(ii) @communications.gov.au>
Sent: Monday, 25 May 2026 3:42 PM
To: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Cc s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>

Subject: Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Tuesday, 2 June 2026 9:53 AM
To: s22(1)(a)(ii)
Cc:
Subject: FW: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals [SEC=OFFICIAL]
Attachments: IMG20260531094847.jpg; IMG20260531094745.jpg

OFFICIAL

FYI – Additional email that was send to s22(1)(a)(ii) @infrastructure.gov.au generic mailbox on 31 May 2026 from complaint in relation to Wool Bay site.

s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

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I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Tuesday, 2 June 2026 9:46 AM
To: s22(1)(a)(ii) @infrastructure.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @communications.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>
Subject: FW: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii)

Fyi – please see below s11C(1)(a) email.

Thanks

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s22(1)(a)(ii)

OFFICIAL

From: s11C(1)(a)
Sent: Sunday, 31 May 2026 12:56 PM
To: MBSP <MBSP@infrastructure.gov.au>
Cc: Venning, Tom (MP Office) <tom.venning.mp@aph.gov.au>; Neil.Sawley@aph.gov.au
Subject: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals

You don't often get email from s11C(1)(a) Learn why this is important

Dear Mobile Black Spot Program team,

I am writing as a resident regarding the proposed base station on Lot 141 Coringle Road, Wool Bay SA 5575/ RFNSA No. 5575028, funded under the Improving Mobile Coverage Round (IMCR) of the Mobile Black Spot Program, with Telstra as grantee. My federal member, Tom Venning MP, has already raised the matter with Telstra; I am now asking the department to undertake its own review, because the grantee cannot independently verify its own compliance.

My concerns go to value for money, disclosure of a material scope variation, and environmental approvals. I have set out the facts and my specific requests below.

What appears to have changed

The approved Development Application indicated that backhaul/data connection for the Wool Bay site would be sourced locally, requiring on the order of 300 metres of connection works. The works now underway involve approximately 8 kilometres of trenched fibre to connect to the existing telecommunications tower at Allot 201 Paddys Well Road,
Coobowie/ RFNSA No. 5583005 — roughly a 27-fold increase in the length of connection works. As far as the community is aware, this variation was not publicly disclosed and we cannot establish whether it was assessed against the program's value-for-money requirements. Trenching has progressed roughly 1 kilometre and currently appears paused; the remaining route would run along St Vincent Highway.

Value for money and eligibility

The IMCR guidelines make value for money central to funding: the department funds a proposed solution where it offers value for money and is within the funding Cap for the location, there is a dedicated value-for-money assessment, and "Cost to the Commonwealth" is a scored assessment criterion. I respectfully ask the department to verify:

1. Whether the current ~8 km trenched-backhaul scope was the scope assessed and funded, or whether it represents a variation to the funded solution. If it is a variation, whether it was formally disclosed to, and approved by, the department under the grant agreement.

2. Whether the project as now scoped continues to represent value for money and remains within the funding basis/Cap on which it was approved, given the materially greater cost and impact of the backhaul route.

The lower-cost alternative that appears not to have been pursued

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The existing tower at Allot 201 Paddys Well Road Coobowie/ RFNSA No. 5583005, approximately 8 km from Wool Bay, appears to have vacant antenna mounting positions oriented toward Wool Bay that have never been fitted. On its face, expanding or co-locating on that existing structure would have been a substantially cheaper and less environmentally damaging way to address the Wool Bay coverage gap than building a new tower plus 8 km of trenching. I am not an engineer and do not assert this option is necessarily feasible. I am asking the department to require Telstra to produce the radio-frequency feasibility analysis that ruled this option out — specifically, evidence demonstrating that antennas on the existing tower could not deliver the program's required coverage standard (RSRP of -85 dBm at 90 per cent confidence) to Wool Bay. If no such analysis was undertaken, that itself is relevant to the value-for-money assessment.

Environmental approvals

The Native Vegetation Council has advised me that no clearance approval under the Native Vegetation Act 1991 was granted for this route, and works currently appear to have stopped. I ask the department to take this into account in assessing whether the funded works were lawfully able to proceed, and whether the environmental cost was reflected in the original value-for-money assessment.

Why I am asking the department rather than relying on a Telstra review

As grantee, Telstra is being asked, in effect, to assess its own conduct against the grant conditions. I do not consider that capable of producing independent accountability, which is why I am asking the department, as administrator of the program with audit and monitoring powers over grantee compliance, to verify these matters directly.

My requests

- Confirm whether a scope variation to the funded solution was disclosed and approved.
- Review whether the project as delivered continues to meet the program's value-for-money and eligibility requirements.
- Require Telstra to provide the RF feasibility analysis that ruled out expanding/co-locating on the existing [EXISTING TOWER] structure.
- Confirm that all required state and federal environmental approvals for the route are in place.
- Given that further trenching would cause irreversible damage, request that Telstra hold irreversible works on this route until these matters are verified.

I strongly support improved mobile coverage for Wool Bay — that is not in dispute. My concern is that public funds and a protected roadside environment are being committed to a solution that may be materially more costly and damaging than necessary, on a basis that does not appear to have been disclosed or independently tested. I would be grateful for written confirmation of how the department intends to proceed, and I am happy to provide photographs and further detail on request.

I have attached two photographs of the existing tower on Allot 201 Paddys Well Road Coobowie/ RFNSA No. 5583005, taken on 31 May 2026: a wider view showing the tower and the adjacent road corridor, and a close-up of the headframe showing what appear to be unused antenna mounting positions oriented toward Wool Bay.

Kind regards,
s11C(1)(a)

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Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts



FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Tuesday, 2 June 2026 11:03 AM
To: s22(1)(a)(ii)
Cc:
Subject: Re: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals [SEC=OFFICIAL]

OFFICIAL

Thanks s22(1), some differences to the original and corro but largely similar in nature.

Hopefully s22(1) gets back to us soon. Given some of the questions that were asked, we will still need to prepare a para or two (on top of what s22(1) provides)....re. Value for money.

Cheers

s22(1)(a)(ii)

OFFICIAL

s22(1)(a)(ii) Duplicate email chain

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Outlook

Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

From s22(1)(a)(ii) @infrastructure.gov.au>
Date Fri 2026-06-05 15:56
To s22(1)(a)(ii) @infrastructure.gov.au>
Cc s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>

OFFICIAL

Apologies for the delay in this - see our response below. Ie, its not for them to make a complaint about the contract management per se - if they have a problem with the installation, they should be taking it up with TIO (and potentially the Local Council - if Local Council have approved the works?)

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Friday, June 5, 2026 3:52 PM
To: s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>
Subject: Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)

Just jumping into this thread to provide some words. We would recommend directing the complainant to contact the TIO in the first instance to express their concerns.
Wording below:

Information about proposed and current telecommunications facilities is available on the Radio Frequency National Site Archive (RFNSA), which is available for public access at www.rfnsa.com.au. This website is managed by the telecommunications industry. If you are concerned about a company's compliance with its obligations under the Act I would encourage you to make a complaint to the Telecommunications Industry Ombudsmen (TIO) via its website at www.tio.com.au/about-us/contact-us or by phoning 1800 062 058.

Thanks
s22(1)(a)

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

s22(1)(a)(ii)
Assistant Director • Telecommunications Deployment Policy • Communication and Markets Division
s22(1)(a)(ii)@infrastructure.gov.au
s22(1)(a)(ii)
GPO Box 594 Canberra, ACT 2601

Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

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I acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islander people.

OFFICIAL

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Friday, 5 June 2026 14:27
To: s22(1)(a)(ii) @infrastructure.gov.au>
Subject: Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

OFFICIAL

From: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Sent: Thursday, May 28, 2026 10:32 AM
To: s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>
Subject: RE: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1

Good timing, just working on words for you now. 😊

Kind regards,

s22(1)(a)(ii)
Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
s22(1)(a)(ii) @infrastructure.gov.au

Released under the FOI Act by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

OFFICIAL

From: s22(1)(a)(ii) @communications.gov.au>
Sent: 28 May 2026 10:31
To: s22(1)(a)(ii) @INFRASTRUCTURE.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>
Subject: Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s22(1)(a)(ii),

Hope you are well.

Just following up on the text for the below complaint we received, as discussed on Monday.

Thanks in advance.

Regards

s22(1)(a)(ii)

s22(1)(a)(ii) Duplicate email chain

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Outlook

Fw: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

From s22(1)(a)(ii) @communications.gov.au>
Date Fri 2026-06-05 15:59
To s22(1)(a)(ii) @infrastructure.gov.au>
Cc s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) s22(1)(a)(ii) @infrastructure.gov.au>

OFFICIAL

Here you are - s22(1)(a)(ii) - enjoy 🙂 !

Cheers

s22(1)(a)(ii)

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Friday, June 05, 2026 15:52
To: s22(1)(a)(ii) @communications.gov.au>
s22(1)(a)(ii)

s22(1)(a)(ii) Duplicate email chain

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s22(1)(a)(ii)

From: s22(1)(a)(ii) @infrastructure.gov.au>
Sent: Tuesday, 9 June 2026 1:22 PM
To: s22(1)(a)(ii)
Cc:
Subject: FW: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals

Hi s22(1)(a)(ii)

Please see s11C(1)(a) follow up email below.

Thank you,

s22(1)(a)(ii)

From: s11C(1)(a)
Sent: Monday, 8 June 2026 8:47 AM
To: MBSP <MBSP@infrastructure.gov.au>
Subject: Re: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals

> You don't often get email from s11C(1)(a) m. Learn why this is important

Dear Mobile Black Spot Program team,

I'm following up on my email below, sent on 31/5/2026, regarding the Wool Bay base station (Mobile Black Spot Program) on the Yorke Peninsula, South Australia.

As I haven't yet received an acknowledgement, could you please confirm receipt and let me know whether a reference number has been allocated to the matter. I'd also be grateful for an indication of the expected timeframe for a response.

My original email setting out the concerns in full is included below for ease of reference. I'm happy to provide any further detail required.

Kind regards,
s11C(1)(a)

From: s11C(1)(a)
Sent: Sunday, 31 May 2026 12:55
To: MBSP@infrastructure.gov.au <MBSP@infrastructure.gov.au>
Cc: Venning, Tom (MP Office) <tom.venning.mp@aph.gov.au>; Neil.Sawley@aph.gov.au <Neil.Sawley@aph.gov.au>
Subject: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals

s22(1)(a)(ii) Duplicate email chain

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s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Tuesday, 23 June 2026 2:24 PM
To: s22(1)(a)(ii)
Cc:
Subject: FW: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals [SEC=OFFICIAL]

Hi s22(1)(a)

Please see below email received by s22(2) Team. I believe this is the same person we have already received correspondence from? s22(1)(a)(ii) has provided advice from an assessment perspective.

Kind regards,

s22(1)(a)(ii)

Senior Program Officer • Mobile Programs Implementation
s22(1)(a)(ii)

From: s22(1)(a)(ii)@infrastructure.gov.au>
Sent: Tuesday, 23 June 2026 2:19 PM
To: s22(1)(a)(ii)@communications.gov.au>
Cc: s22(1)(a)(ii)@infrastructure.gov.au>
Subject: Fw: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals [SEC=OFFICIAL]

OFFICIAL

Hi Team,

I have had a look at this correspondence in relation to the MBSP6 (IMCR) Wool Bay MBSP solution, and from an assessment perspective:
The Wool Bay solution was recommended as value for money due to the expected coverage benefit. This approach is consistent with the IMCR guidelines.

The department's assessment did not consider detailed engineering inputs such as the backhaul route, trenching length or backhaul construction. Assessment was based on the overall solution type, cost and coverage outcomes, with backhaul only considered at a high level.

Given this, differences between planning approval documentation and the delivery approach do not necessarily indicate that the assessed scope was inaccurate or misrepresented.
I do not currently see evidence of an assessment issue.

The concerns raised is whether what is now being delivered during implementation is consistent with the funded solution, or whether the scope has changed during delivery.

Given the nature of the issues raised in the correspondence, can implementation please respond as the concerns raised relate to the contract management phase.

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Happy to support if we need to confirm any other details from the original assessment.

Thanks

s22(1)(a)(ii)

From: s11C(1)(a)
Sent: Wednesday, 10 June 2026 14:06
To: MBSP <MBSP@infrastructure.gov.au>
Cc: Venning, Tom (MP Office) <tom.venning.mp@aph.gov.au>; Sawley, Neil (T. Venning, MP) <neil.sawley@aph.gov.au>
Subject: Re: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals [SEC=OFFICIAL]

> You don't often get email from s11C(1)(a) Learn why this is important

Dear Mobile Black Spot Program team,

Thank you for your reply, and for confirming the department is reviewing these matters — I appreciate the concerns being taken seriously.

I'm happy to provide any documentation that would assist, and I look forward to the outcome of your review.

Kind regards,
s11C(1)(a)

From: MBSP <MBSP@infrastructure.gov.au>
Sent: Wednesday, 10 June 2026 13:27
To: s11C(1)(a) MBSP <MBSP@infrastructure.gov.au>
Subject: RE: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals [SEC=OFFICIAL]

OFFICIAL

Hi s11C(1

Thank you for your correspondence.

We acknowledge your concerns about whether funding for the Wool Bay Mobile Black Spot Program project represents value for money, and whether appropriate approvals were obtained following its relocation.

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The department remains committed to ensuring projects are delivered in line with program requirements and achieve intended coverage outcomes. We are currently reviewing these matters and will provide further advice shortly.

Thank you again for reaching out and sharing your concerns.

Regards,

Mobile Black Spot Program
GPO Box 594 Canberra, ACT 2601

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I acknowledge the traditional custodians of this land on which we meet, work and live.

I recognise and respect their continuing connection to the land, waters and communities.

I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islander people.

OFFICIAL

From: s11C(1)(a)
Sent: Monday, 8 June 2026 8:47 AM
To: MBSP <MBSP@infrastructure.gov.au>
Subject: Re: Request for departmental review — Wool Bay MBSP solution: material scope variation, value for money and environmental approvals

s22(1)(a)(ii) Duplicate email chain

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s22(1)(a)(ii)

From: s22(1)(a)(ii)
Sent: Friday, 3 July 2026 9:03 AM
To: s47F
Cc: s47F s22(1)(a)(ii)
Subject: For Immediate Action - FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Morning s47F

Just following up on the Wool Bay issue's raised in the email below.

Thanks in advance.

Regards

s22(1)(a)(ii)

OFFICIAL

From: s22(1)(a)(ii) @communications.gov.au>
Sent: Tuesday, 26 May 2026 20:02
To: s47F
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s47F
Subject: Re: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

OFFICIAL

Hi s47F

Thanks for your email and update on the issues raised.

We look forward to hearing from you once more information is available.

Regards

s22(1)
(a)(ii)

OFFICIAL

From: s47F
Sent: Tuesday, 26 May 2026 16:34
To: s22(1)(a)(ii) @communications.gov.au>
Cc: s22(1)(a)(ii) @infrastructure.gov.au>; s22(1)(a)(ii) @infrastructure.gov.au>; s47F

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Subject: For Immediate Action Fw: FORMAL COMPLAINT: Material Breach of Scope and Value-for-Money Failure under MBSP – Wool Bay Project (Telstra) [SEC=OFFICIAL]

s22(1)(a)(ii) Duplicate email chain

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Outlook

FW: MBSP6-SA-004 - Wool Bay - Project MBSP6: Native Vegetation Issues FDR000962 || Wool Bay IMCR-TLS-036 SN16934 || POSO: 40630333 [SEC=OFFICIAL]

From s22(1)(a)(ii) @infrastructure.gov.au>
Date Wed 2026-07-08 15:23
To s22(1)(a)(ii) @infrastructure.gov.au>

OFFICIAL

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FYI – Not sure if you have this regarding Wool Bay, but will include it in PDMS - MC26-006890, not sure if the min corro will need to be updated to include this information.

Regards

s22(1)(a)(ii)

Program Officer • Mobile Programs Implementation •
Regional Mobile Infrastructure Programs • Connectivity Division
s22(1)(a)(ii) @infrastructure.gov.au • s22(1)(a)(ii)

GPO Box 594 Canberra, ACT 2601

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I would like to acknowledge the traditional custodians of this land on which we meet, work and live.
I recognise and respect their continuing connection to the land, waters and communities.
I pay my respects to Elders past and present and to all Aboriginal and Torres Strait Islanders.

OFFICIAL

From: s47F
Sent: Tuesday, 7 July 2026 12:42 PM
To: s22(1)(a)(ii) @infrastructure.gov.au>
Subject: MBSP6-SA-004 - Wool Bay - Project MBSP6: Native Vegetation Issues FDR000962 || Wool Bay IMCR-TLS-036 SN16934 || POSO: 40630333

FYI

s47F

s47F

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on is unauthorised and prohibited. If you have
received this communication in error, please reply to this email to notify the sender of its incorrect delivery, and then delete both it and your reply.

General

From: s47F
Sent: Monday, July 6, 2026 3:20 PM
To: s47F
s47F
Cc: s47F

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Hi s47F

We have liaised with SA Department of Environment and Water, who the complaint was also raised with, and they have advised that based on the evidence we have provided that no action will be taken regarding the matter unless evidence of unauthorised clearance not previously considered is received.

We have advised that there is no further planned clearing as the remaining route is to go through previously cleared farmlands. If this changes we will let them know.

Kind Regards

s47F
Senior Stakeholder Engagement Manager
Land Stewadship Engagement and Compliance (LSEC)
Telstra Digital Infrastructure (TDI)

s47F

W www.telstra.com

Telstra recognise and acknowledge the existing, original, and ancient connection Aboriginal and Torres Strait Islander peoples have to the lands, waterways, and sky country across the Australian continent.
We pay our respects to their Elders and Ancestors.
This email may contain confidential information.
If I've sent it to you by accident, please delete it immediately.

s47F

General

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