



# Mobile Network Hardening Program Perth Hills Round - Draft Grant Opportunity Guidelines

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

*27 January 2026*

## Recommendations

This submission recommends the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts:

1. Strengthen battery backup requirements by providing additional weighting for applicants demonstrating more than 20 hours of backup power capacity.
2. Expand prioritisation criteria to include population density, proximity to emergency services, historical outage frequency, and presence of vulnerable populations.
3. Improve transparency by requiring third party in-kind co-contributions to be reflected in a reduction of funding sought, rather than leaving this optional.
4. Establish clear delivery milestones and accountability measures to ensure the timely implementation of resilience upgrades.
5. Develop an ongoing monitoring and evaluation framework to assess the effectiveness of upgrades against baseline outage data.
6. Support coordination between telecommunications resilience upgrades and other essential services, including electricity providers and emergency services.
7. Publish the Mobile Network Hardening Program's outcomes, including successful locations, types of upgrades and community benefits, to improve transparency and accountability.
8. Ensure meaningful community engagement by regularly updating the local community on resilience upgrades and educating consumers about improved resilience.
9. Prioritise the needs of vulnerable populations, including elderly residents, people with disabilities, and those reliant on telecommunications for medical equipment or emergency communication.

## About this submission

ACCAN is pleased to provide this submission to the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (**the Department**) on the Mobile Network Hardening Program Perth Hills Round - Draft Grant Opportunity Guidelines (**the Guidelines**). ACCAN supports the Department's Mobile Network Hardening Program (**MNHP**) for the Perth Hills region, which allocates \$1.2 million (GST exclusive) to enhance telecommunications resilience.

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ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services.

## 1. Introduction

In January 2024, the Perth Hills communities experienced prolonged power outages after a storm cell knocked down trees and power lines, disrupting telecommunications services.<sup>1</sup> During emergencies like bushfires and storms, telecommunications outages can severely hinder effective response, communication, and recovery efforts.<sup>2</sup>

ACCAN supports the Department's MNHP, which has allocated \$1.2 million (GST exclusive) to provide resilience upgrades in the Perth Hills region of Western Australia.<sup>3</sup> This investment in upgrading battery backup power and installing Automatic Transfer Switches represents a significant step towards enhancing telecommunications resilience for these peri-urban and regional communities.

## 2. Strengthen battery backup requirements

ACCAN recommends that applicants who can demonstrate more than 20 hours of battery backup power capacity should receive additional weighting in the assessment process. This approach would raise resilience standards and provide greater protection for communities during prolonged outages.

## 3. Expand prioritisation criteria

ACCAN recommends that the assessment process include additional weighting factors beyond battery backup capacity. These factors should include population density, proximity to emergency services, historical outage frequency, and the presence of vulnerable populations, such as elderly residents, people with disabilities, and those reliant on medical equipment that requires connectivity. This approach would ensure funding is directed to areas of greatest need.

## 4. Improve transparency of third-party funding co-contributions

ACCAN supports the Mobile Network Hardening Program Perth Hills Round - Draft Grant Opportunity Guidelines (**the Guidelines**) requirements for the exact identification of contributions from third parties in applications, which are essential to minimise the risk of third parties and the Commonwealth funding the same activities.<sup>4</sup>

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<sup>1</sup> Western Australian Local Government Association (WALGA), *\$1.2m telecommunications boost for the Perth Hills a welcome step towards building resilient communities* (Media Release, 19 February 2025) <[https://walga.asn.au/media-and-resources/media-releases/\\$1-2m-telecommunications-boost-for-the-perth-hills-a-welcome-step-towards-building-resilient-communi](https://walga.asn.au/media-and-resources/media-releases/$1-2m-telecommunications-boost-for-the-perth-hills-a-welcome-step-towards-building-resilient-communi)>.

<sup>2</sup> Ibid.

<sup>3</sup> Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts, *Draft Mobile Network Hardening Program Perth Hills Round Grant Opportunity Guidelines* (Guidelines, December 2025) 5.

<sup>4</sup> Ibid 7.

However, ACCAN recommends that section 3.3 be amended to require that third-party in-kind co-contributions be reflected in a reduction in the amount of funding the applicant seeks for a proposed Resilience Upgrade project, if applicable.<sup>5</sup> If this requirement remains optional, applicants may receive funding that includes the value of the in-kind contribution, allowing them to retain any excess. Enhancing transparency will also improve accountability between the third party and the applicant.<sup>6</sup>

## **5. Promote a data-driven approach to site selection**

ACCAN supports the Department's inclusion of a data-driven approach to site selection using indicators of a community's vulnerability to a natural disaster and power outage (such as the System Average Interruption Duration Index and System Average Interruption Frequency Index). These data sources provide objective measures for assessing community needs and ensuring that funding is directed to areas where it will have the greatest impact on telecommunications resilience. This approach reflects ACCAN's previous recommendation during Round 2 of the Mobile Network Hardening Program draft guidelines.<sup>7</sup>

## **6. Establish clear timeframes and accountability measures**

ACCAN recommends that the Department establish clear delivery milestones and accountability measures for resilience upgrades. Regular public reporting should be incorporated to keep affected communities informed at each stage of the delivery process. Such transparency will help ensure timely implementation and provide assurance to communities that funded projects are progressing as intended.

## **7. Develop an ongoing monitoring and evaluation framework**

ACCAN recommends that the Department develop an ongoing performance-monitoring framework to assess the effectiveness of resilience upgrades against baseline outage data. This approach would allow for evaluating whether funded projects are delivering intended outcomes – or being delivered at all – and would inform future rounds of the MNHP. ACCAN stakeholders in regional areas have reported instances in which providers secured Australian Government funding but later withdrew from

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<sup>5</sup> Australian Communications Consumer Action Network (ACCAN), *Consultation PUMP draft funding guidelines* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 25 August 2021); Australian Communications Consumer Action Network (ACCAN), *Mobile Network Hardening Program Round 2 Grant Opportunity Draft Guidelines* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 22 May 2023);

<sup>6</sup> Australian Communications Consumer Action Network (ACCAN), *Consultation PUMP draft funding guidelines* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 25 August 2021) 1.

<sup>7</sup> Australian Communications Consumer Action Network (ACCAN), *Mobile Network Hardening Program Round 2 Grant Opportunity Draft Guidelines* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 22 May 2023) 2.

projects, citing challenges with council approvals and difficulties finding willing landowners in the area. Although funding may be recoverable in such cases, affected communities are left having lost 1 to 2 years in the process, with no improvement to their coverage or infrastructure.

## **8. Support coordination with other essential services**

ACCAN recommends that the Department support integrated planning approaches to coordinate telecommunications resilience upgrades with electricity providers and emergency services agencies. ACCAN acknowledges that power failures frequently cause telecommunications outages. By fostering cross-sector collaboration, communities can strengthen their overall resilience during emergencies. This collaboration could also include developing agreements for expedited repairs in particularly vulnerable areas, ensuring that telecommunications and energy providers are aligned on priorities when services go down. Such agreements would help resolve situations where providers might otherwise disagree on where to direct their restoration efforts, ultimately reducing delays for affected communities.

## **9. Make the MNHP's outcomes publicly available**

To further align the MNHP with the *Commonwealth Grant Rules and Guidelines*' key principles of transparency and accountability, ACCAN recommends that the Department make the MNHP's outcomes publicly available.<sup>8</sup> The Department should publish a summary report of the MNHP's outcomes, including information on successful locations, types of resilience upgrades, and how communities directly benefit from the MNHP.

ACCAN supports the Department's commitment to provide unsuccessful applicants with written feedback explaining why the MNHP did not fund their proposed resilience upgrade, as reflected in our previous recommendations to Round 2 of the Mobile Network Hardening Program draft guidelines.<sup>9</sup>

## **10. Ensure meaningful community engagement**

ACCAN believes that meaningful community engagement is essential to the MNHP's success. The assessment criteria should include requirements for regularly updating local communities on resilience upgrades. This approach will foster meaningful, ongoing partnerships with local communities, ensuring that infrastructure upgrades deliver tangible benefits for residents, businesses, and emergency services. ACCAN also recommends that the Department develop a consumer education component to inform communities about improved resilience and what to expect during future outages.

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<sup>8</sup> Ibid.

<sup>9</sup> Ibid.

## 11. Prioritise the needs of vulnerable populations

ACCAN recommends that the MNHP explicitly prioritise the needs of vulnerable populations, including elderly residents, people with disabilities, and those reliant on telecommunications for medical equipment or emergency communication. Ensuring access to resilient telecommunications infrastructure is essential for protecting everyone – and particularly those most at risk – during emergencies.

## 12. Conclusion

ACCAN supports the MNHP in the Perth Hills as a vital measure to enhance telecommunications resilience in communities vulnerable to bushfires and storms. We thank the Department for the opportunity to comment on the Guidelines. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact [REDACTED], at [REDACTED]

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.

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