



Amplitel's submission in response to the Mobile Network Hardening Program Perth Hills Round draft Grant Opportunity Guidelines

4 February 2026

1. Introduction

1.1 This submission is made by Amplitel Pty Ltd (**Amplitel**) in response to the Mobile Network Hardening Program Perth Hills Round draft Grant Opportunity Guidelines (**Draft Guidelines**) released by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (**Department**) on 15 January 2026. Information about Amplitel is set out in Annexure A.

1.2 Amplitel welcomes the opportunity to provide feedback on the Draft Guidelines and strongly supports the Australian Government's commitment to improving the resilience of mobile telecommunications infrastructure in high-risk peri-urban regions. In this submission, we offer feedback with respect to **Assessment Criterion 1**, and its interaction with the Program's broader objectives and other assessment criteria.

2. Response to Criterion 1 – Cost per Hour of Battery Life

2.1 Amplitel supports the inclusion of a value-for-money measure within the assessment framework. Efficient allocation of public funding is essential, and a quantitative approach to normalising proposed investment is appropriate.

2.2 However, as currently framed, Criterion 1's use of **cost per hour of battery life** as the primary value metric may unintentionally favour proposals that deliver smaller and less impactful upgrades. Lighter load facilities, typically smaller single operator sites with reduced coverage footprints, generally require fewer batteries and lower capacity systems. As a result, these sites can appear comparatively "cheap" on a cost-per-hour basis, even though they provide less meaningful connectivity uplift or overall resilience benefit to the community.

2.3 Conversely, sites that support a larger volume of users, broader coverage areas, and multiple critical services require higher battery capacities to maintain network continuity during outages. While these sites may involve higher capital expenditure, they also support significantly larger catchments and ensure continuity of:

- multiple Mobile Network Operators' services;
- State and Commonwealth emergency communications;
- fixed wireless access services; and
- microwave backhaul to downstream and remote towers.

These facilities are exactly where resilience investment can generate the most substantial and enduring community benefit.

3. Alignment Between Criterion 1 and Criterion 2

3.1 Criterion 2 appropriately identifies that higher value locations, those supporting emergency services, high population catchments, or areas with lower inherent resilience should attract priority consideration. However, without calibration, Criterion 1 may conflict with Criterion 2 by:

- structurally favouring low-capacity sites simply because they require fewer batteries;
- disadvantaging infrastructure providers (such as Amplitel) whose multi-tenant sites are engineered for higher loads; and
- encouraging investment that maximises “points per dollar” rather than maximising **resilience uplift per community**.

3.2 We recommend that the Department consider adjusting the assessment criteria to better support the Program’s objectives and ensure Criterion 1 is consistent with the intent of Criterion 2.

4. **Suggested Improvement to Criterion 1**

4.1 Amplitel recommends that value-for-money be assessed using a **cost per kilowatt-hour of installed battery capacity (\$/kWh)** metric rather than the current **cost per hour of battery life** measure. We also recommend that the Government require submissions to include the rate at which the site will consume energy capacity, ensuring that the Hours of Battery Life metric can be easily determined and the local community benefit clearly articulated.

4.2 Assessing on a \$/kWh basis is:

1. **A recognised industry standard**

Battery capacity, not runtime, is the accepted engineering measure of the scale and resilience of backup power systems.

2. **More directly linked to infrastructure impact**

Installed kWh capacity represents the **actual quantum of backup capability delivered**, regardless of load variations between sites.

3. **Neutral between high-load and low-load facilities**

The metric allows fair comparison across different tower/site configurations and technologies. It does not penalise sites that carry more equipment or multiple operators.

4. **Better aligned with Criterion 2’s community benefit focus**

By measuring the *scale* of resilience uplift, the assessment naturally favours investments where a single upgrade can deliver substantial catchment-wide continuity and better support emergency response.

4.3 **Proposed wording amendment (for the Department’s consideration)**

Criterion 1 – Value for Money: Projects will be assessed on the basis of cost per unit of installed battery capacity (\$/kWh), or another measure that accurately reflects the scale and resilience impact of the proposed upgrade.

4.4 This approach maintains a clear, quantitative value metric while ensuring the Program supports the greatest possible community benefit.

5. **Government contribution rate for multi tenanted sites**

5.1 To reflect the overall community benefit and higher costs to deliver solutions at higher load, multi-tenanted sites and in order to encourage efficient industry investment, Amplitel recommends that the Department also considers an increased contribution rate for these sites.

6. **Conclusion**

6.1 Amplitel strongly supports the objectives of the Perth Hills Round and the Government's broader investment in mobile resilience and disaster preparedness. Adjusting Criterion 1 to reflect cost per kilowatt-hour of installed capacity would:

- more accurately represent the value delivered;
- ensure alignment between all assessment criteria;
- encourage investment in sites where resilience uplift provides maximum community benefit; and
- support the Program's intention to strengthen mobile network reliability during natural disasters and extended power outages.

We welcome continued engagement with the Department to refine the Guidelines and deliver resilient, future-proof connectivity for Western Australian communities.

Annexure A

About Amplitel

Amplitel was established on 1 September 2021 following the transfer of the towers business of Telstra Corporation Ltd to Amplitel and sale of a 49% interest in that business to a consortium of investors. This consortium includes the Future Fund, Australian Retirement Trust, Commonwealth Superannuation Corporation and Morrison & Co Infrastructure Partners. The Telstra group continues to hold 51% of Amplitel.

Amplitel is a mobile network infrastructure provider (**MNIP**) and provides most of the passive infrastructure assets at a communications site required to establish and operate a telecommunications tower. These include land, security fencing, access tracks, the tower and connection to the power network (where available). The active assets (those that require power to operate or can transmit data) are provided and operated by Amplitel's customers. In addition, some passive assets (such as equipment huts) which are unique to a customer's equipment will be provided by the customer.

Amplitel is the largest provider of towers infrastructure across Australia. We operate over 8,000 towers, masts, poles, and other structures ¹. Amplitel also has access to Telstra's equipment building rooftops and street side poles. Amplitel is not a mobile network operator (**MNO**) nor a carrier and we do not supply carriage services. Our customers include MNOs, public emergency network and private radio and wireless network operators, major corporations, government and not-for-profits.

¹ Amplitel's tower locations are available at <https://www.amplitel.com.au/tower-locations>