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BIRRR Submission – National Regional Roads Australia Mobile Program (National RRAMP) Draft Grant Opportunity Guidelines



July 2026



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SURMISSION DETAILS



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About BIRRR

Better Internet for Rural, Regional and Remote Australia (BIRRR) is a national, independent, volunteer-led telecommunications advocacy organisation representing more than 16,500 rural, regional and remote (RRR) Australians. Since 2014, BIRRR has assisted thousands of consumers to navigate telecommunications issues, providing unique insight into the real-world challenges Australians face in accessing reliable, affordable and fit-for-purpose telecommunications services, including during emergencies and natural disasters.

Executive Summary

Better Internet for Rural, Regional and Remote Australia (BIRRR) welcomes the opportunity to provide feedback on the draft Grant Opportunity Guidelines for the National Regional Roads Australia Mobile Program (National RRAMP). BIRRR supports the Australian Government's objective of expanding usable mobile coverage along regional roads and recognises the important role the program can play in improving public safety, emergency communications, economic participation and connectivity for regional communities and road users.

BIRRR supports the program's focus on increasing mobile coverage but considers that long-term success should be measured not simply by the amount of infrastructure deployed, but by whether funded infrastructure delivers reliable, resilient and usable communications that continue to meet consumer needs over time. Commonwealth investment should maximise public benefit by ensuring funded infrastructure is fit for purpose, resilient, transparent, informed by community need and capable of supporting future communications requirements.

The draft guidelines would be strengthened through greater transparency, clearer assessment processes and stronger governance arrangements that enable regional communities and local governments to meaningfully contribute to identifying priorities and shaping investment decisions. Public investment should be guided by evidence, consumer outcomes and long-term value, while maintaining flexibility to support innovative delivery models where they provide equivalent or greater public benefit. This should include ensuring investment decisions are informed by nationally consistent evidence, including the National Audit of Mobile Coverage, while remaining responsive to local knowledge and emerging community priorities.

To strengthen the National RRAMP, BIRRR recommends that the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (the Department):

1. Retain the program's primary objective of expanding usable mobile coverage, while recognising that, in some discrete locations, technology-neutral or shared connectivity solutions may deliver greater long-term public benefit than single-carrier mobile infrastructure.

2. Require Commonwealth-funded infrastructure to support infrastructure sharing and open access arrangements wherever practicable, maximising the number of consumers who benefit from public investment.
3. Strengthen community engagement by requiring applicants to demonstrate meaningful consultation with regional stakeholders, establishing a formal mechanism for local governments and regional organisations to contribute to the identification and nomination of Eligible Roads/Strategic Locations, and providing independent support to assist communities in identifying priorities and participating in project development.
4. Publish and maintain a publicly accessible Eligible Roads/Strategic Locations database, clearly explaining the methodology and evidence used to identify locations (including how the National Audit of Mobile Coverage has informed the process). Maintain the database as a living dataset that is regularly reviewed, reprioritised and informed by community nominations and updated evidence.
5. Explain how lessons from the RRAMP Pilot Programs have informed the National RRAMP, and publish pilot evaluation findings where available to support transparency and evidence-based program design.
6. Strengthen the assessment criteria and scoring matrices to explicitly recognise resilience, infrastructure sharing, consumer need, evidence-based planning, emergency communications capability and long-term public value alongside coverage expansion.
7. Establish robust transparency, monitoring and evaluation arrangements, including publicly available reporting, independent post-deployment evaluation, verification that funded infrastructure continues to meet approved resilience measures throughout the operational period, and minimum operational and reliability expectations for Commonwealth-funded infrastructure.
8. Require all Commonwealth-funded infrastructure to provide a minimum of 72 hours of backup power as a mandatory condition of funding, remove the broad "*where technically feasible*" qualifier, and encourage broader resilience measures including infrastructure hardening, network redundancy and diverse backhaul where practical.

These recommendations are also consistent with BIRRR's recent submissions on the Triple Zero Review, Universal Outdoor Mobile Obligation (UOMO) and broader telecommunications resilience reforms, which collectively highlight the importance of reliable communications during emergencies and extended outages. BIRRR believes these recommendations will help ensure the National RRAMP delivers

enduring improvements to regional connectivity by focusing not only on expanding coverage, but on providing reliable, resilient and consumer-focused communications infrastructure that represents the greatest long-term value from Commonwealth investment.

1. Who is eligible to apply for a grant?

BIRRR notes that eligibility for the National Regional Roads Australia Mobile Program (National RRAMP) is limited to Mobile Network Operators (MNOs) and Mobile Network Infrastructure Providers (MNIPs). While these organisations will play a critical role in expanding mobile coverage, BIRRR encourages the Department to ensure the program remains focused on achieving the best public outcomes, rather than prescribing particular delivery models or technologies.

Limiting eligibility to MNOs and MNIPs may unintentionally reduce consideration of innovative or complementary connectivity solutions that could deliver equivalent or greater public benefit in some discrete locations.

This is particularly relevant for smaller, targeted connectivity improvements at roadside rest areas, roadhouses, campgrounds and other isolated locations. Where the objective is to provide connectivity to a discrete location, rather than extend mobile coverage along a transport corridor, the Department should consider whether innovative, technology-neutral or shared solutions, including publicly accessible free Wi-Fi and neutral-host infrastructure could provide greater long-term public benefit than single-carrier infrastructure. BIRRR encourages the Department to consider whether greater flexibility could be incorporated where alternative technologies or partnership models can demonstrably deliver equivalent or better public benefit.

BIRRR further recommends that infrastructure funded through the National RRAMP be required, wherever practicable, to support infrastructure sharing and open access arrangements. Where Commonwealth funding is provided, the resulting infrastructure should maximise public benefit by being available to the widest possible number of consumers, rather than benefiting only the customers of a single carrier. Where Commonwealth funding is used to deploy small cells or other targeted mobile infrastructure, funding should be conditional on that infrastructure being available for use by multiple MNOs through infrastructure sharing, neutral-host arrangements or other open access models. Where technically and commercially appropriate, this may include domestic roaming or other arrangements that enable customers of multiple MNOs to benefit from publicly funded infrastructure.

Ultimately, BIRRR believes that, for these targeted locations, assessment should focus on delivering the best connectivity outcome for consumers rather than assuming a carrier-owned mobile solution is always the best answer. Public investment should prioritise the consumer and public benefit achieved, provided the proposed solution meets the objectives of the program.

2. Community Engagement and Project Development

BIRRR supports the draft Guidelines encouraging collaboration between eligible applicants and local stakeholders. However, we are concerned that the success of the National RRAMP will depend not only on funding infrastructure, but also on ensuring regional communities have meaningful opportunities to identify priorities and contribute to project development.

As eligibility is limited to MNOs and MNIPs, there is a risk that investment priorities become largely carrier-led. BIRRR encourages the Department to clarify how regional communities, local governments, Regional Organisations of Councils (ROCs), Regional Development Australia committees (RDAs), First Nations communities, emergency services and other stakeholders will be able to influence projects.

Applicants should be required to demonstrate meaningful engagement with relevant regional stakeholders as part of the application process. This would help ensure projects respond to genuine community need and local knowledge, rather than being driven primarily by commercial network planning.

BIRRR also notes that many regional councils and communities do not have specialist telecommunications expertise to identify coverage gaps, assess available technologies, evaluate competing proposals or determine which delivery partner is best placed to meet local needs. This challenge has become even more significant following the cessation of Commonwealth funding for the Regional Tech Hub, which previously provided independent telecommunications advice to regional consumers and communities.

BIRRR encourages the Department to consider what independent support will be available to assist regional stakeholders to understand the program, identify priority locations, assess proposals and develop partnerships that deliver the greatest long-term benefit for their communities. This should include access to improved coverage mapping, independent technical advice and initiatives that strengthen connectivity literacy, enabling communities to participate in evidence-based planning and informed engagement with eligible applicants.

The Department should also clarify whether there will be a formal mechanism for regional stakeholders to nominate priority locations or identify connectivity issues outside of what has been stated in the draft Guidelines. Without such a mechanism, communities may have limited opportunity to influence investment decisions where eligible applicants do not identify a location as a commercial priority.

Ultimately, the success of the National RRAMP will depend not only on funding infrastructure, but also on ensuring regional communities have the capability, information and independent support needed to identify priorities and participate effectively in project development.

3. Eligible Locations and Road Nomination Process

BIRRR welcomes the development of an Eligible Locations Database to support a more strategic, transparent and evidence-based approach to investment under the National RRAMP. However, the draft Guidelines provide limited information on how eligible roads and strategic locations have been identified, how the database will operate in practice, or how stakeholders can meaningfully contribute to its ongoing refinement.

While the draft Guidelines refer to an Eligible Locations Database, it was not available as part of the consultation material. Without access to the database, stakeholders are unable to determine which roads, strategic locations and coverage gaps have been identified as eligible, assess whether priority areas have been appropriately captured, or provide informed feedback on the proposed Guidelines. BIRRR encourages the Department to publish the Eligible Locations Database as part of the consultation process and ensure it remains publicly accessible throughout the life of the program.

BIRRR encourages the Department to clearly explain how the National Audit of Mobile Coverage has informed the development of the Eligible Roads Database. Given the National Audit of Mobile Coverage represents one of the most comprehensive national datasets on Australia's major road network, it should form a key evidence base for identifying and prioritising Eligible Roads. However, national datasets alone cannot capture every regional priority. They should be complemented by telecommunications-specific evidence, local knowledge and ongoing community nominations to ensure investment reflects real-world connectivity needs.

BIRRR also encourages the Department to provide greater transparency regarding the methodology used to identify eligible roads and strategic locations, including the data sources, validation processes and mapping of existing coverage gaps. It is also unclear whether eligibility applies to an entire road corridor

or only to specific coverage gaps and strategic locations along that corridor. Greater clarity would provide confidence that investment is being directed to locations of genuine consumer need.

The draft Guidelines do not outline the consultation undertaken to develop either the Eligible Locations Database or the Eligible Strategic Locations Database. BIRRR encourages the Department to clarify what input was sought from state and territory road agencies, local government associations (LGAs), ROCs, RDAs, emergency services, freight and tourism stakeholders, transport operators and regional communities. Local knowledge is essential to identifying priority locations that improve safety, emergency communications and connectivity outcomes.

The draft Guidelines provide a mechanism for state and territory governments to request that additional roads be added to the Eligible Locations Database. Registered applicants (MNOs and MNIPs) and federal, state and territory parliamentarians may also request that additional roads be considered, subject to endorsement by the relevant state or territory government. However, there does not appear to be a formal mechanism for LGA's, ROCs or other regional stakeholders to directly nominate roads or strategic locations, despite these organisations often possessing the strongest understanding of local connectivity needs and regional priorities. BIRRR recommends that the Department establish a formal mechanism for these stakeholders to contribute to the identification and nomination of Eligible Roads and Eligible Strategic Locations. Their input should complement existing nomination pathways and help ensure investment decisions are informed by local knowledge, consumer need and regional priorities.

BIRRR welcomes the inclusion of a process to nominate additional roads for inclusion in the Eligible Locations Database. However, the Guidelines provide limited detail on how nominations will be assessed or the evidence that will inform decision-making. While factors such as freight, tourism, road safety and emergency access are appropriate considerations, BIRRR encourages the Department to also consider telecommunications-specific evidence, including verified coverage mapping, mobile performance data, independent drive testing or mobile coverage audits, consumer-reported experience, crowdsourced performance data where available and input from transport operators, emergency services and regional communities. Telecommunications planning should be informed by both technical evidence and lived consumer experience.

The introduction of Eligible Strategic Locations, including rest areas, truck stops, campgrounds, service centres, electric vehicle charging stations, tourist sites and public toilets, is also welcomed. However, the draft Guidelines note that these locations are included only "based on available data" and do not

represent all eligible strategic locations. BIRRR encourages the Department to clarify the data sources used, how omitted locations can be identified and nominated, and how the database will be maintained to ensure important regional facilities are not inadvertently overlooked.

BIRRR recommends the Eligible Locations Database be maintained as a living dataset rather than a static list, with regular updates informed by changes in network coverage, new strategic infrastructure, road usage, emergency management priorities and community nominations. The Department should also establish a transparent process for reviewing and reprioritising Eligible Roads and Eligible Strategic Locations where network deployment, changing traffic patterns, emergency management priorities or new evidence indicate that investment priorities have changed.

Finally, the Department should clearly outline how requests to add roads and strategic locations will be assessed and how local knowledge will be incorporated into future updates of the Eligible Locations Database. Public access to the Eligible Locations Database, together with the methodology used to determine eligibility, would improve transparency, support informed community participation, enable regional stakeholders to engage constructively with eligible applicants and help ensure investment decisions are guided by both technical modelling and real-world consumer experience.

4. Lessons from the RRAMP Pilot Programs

BIRRR notes that the National RRAMP is intended to complement the state and territory RRAMP Pilot Programs. However, it is unclear how the findings or lessons from these pilot programs have informed the development of the draft National RRAMP Guidelines.

As the pilot programs were established to test delivery models, technology solutions and approaches to identifying priority locations, BIRRR encourages the Department to outline how the outcomes have been incorporated into the national program. If the pilot evaluations have not yet been completed, consideration should be given to publishing the findings and lessons learned before finalising the National RRAMP Guidelines. This would help ensure the national program is informed by evidence, builds on proven approaches and delivers the greatest long-term benefit for regional communities, road users and transport corridors.

5. Funding Allocation Across Jurisdictions

BIRRR supports the objective of achieving a national distribution of funding and recognises the importance of ensuring all jurisdictions have an opportunity to participate in the National RRAMP. However, when considered against the scale of Australia's RRR road network, the available funding is likely to require careful prioritisation and difficult investment decisions. It is therefore essential that the assessment framework and funding Guidelines maximise the public benefit derived from every Commonwealth dollar invested.

BIRRR also acknowledges the increased emphasis on implementation-ready ("shovel ready") projects within the National RRAMP. This should help improve delivery timeframes and reduce the risk of funding being committed to projects that experience significant delays or ultimately do not proceed. However, project readiness should complement, not outweigh, consideration of consumer need, resilience, long-term public value and strategic importance when assessing competing proposals.

Further clarification would be welcomed on how funding will be managed following the initial eight-month jurisdictional allocation, including how unused funding will be redistributed and how the Department will ensure investment continues to be prioritised according to consumer need, strategic importance and value for public investment, rather than simply project readiness.

BIRRR also encourages the Department to explain how the funding approach reflects the differing scale, remoteness and connectivity challenges across jurisdictions. Australia's connectivity needs do not align neatly with state and territory boundaries. Jurisdictions such as Queensland and Western Australia have extensive road networks, long remote transport corridors and comparatively sparse populations, which can present significantly different challenges to more densely populated jurisdictions such as Victoria.

BIRRR encourages the Department to provide greater transparency regarding how these factors will be considered when determining the distribution of funding over the life of the program, to ensure investment delivers the greatest public benefit.

6. Assessment Criteria and Scoring Matrices

BIRRR welcomes the inclusion of transparent assessment criteria and scoring matrices to guide funding decisions under the National RRAMP. Clear and consistent assessment criteria will help ensure projects

deliver measurable public value and provide confidence that Commonwealth investment is directed to areas of greatest need.

However, BIRRR encourages the Department to provide greater clarity on the factors that will be considered when assessing public policy and economic benefits. In particular, the assessment framework should recognise the broader benefits of resilient, reliable and future-ready communications infrastructure, rather than focusing primarily on the expansion of mobile coverage.

For example, projects assessed as delivering "significant public policy benefits" could explicitly include proposals that provide extended backup power beyond the minimum requirement, support infrastructure sharing or open access, demonstrate meaningful community consultation, and incorporate resilient design features such as diverse backhaul and network redundancy.

For projects demonstrating significant public policy benefits, BIRRR encourages the Department to recognise proposals that:

- improve network resilience, including extended backup power capability;
- address demonstrated telecommunications need using evidence from the National Audit of Mobile Coverage, verified coverage mapping, mobile performance data, independent drive testing, consumer-reported experience and other relevant datasets;
- are informed by meaningful consultation with regional communities, LGAs, emergency services and other stakeholders;
- promote infrastructure sharing, open access and collaborative delivery models; and
- deliver long-term improvements to public safety, emergency communications and community resilience.

Similarly, the assessment of economic benefits should recognise the broader contribution that improved telecommunications infrastructure makes to regional Australia. This includes supporting freight and logistics, tourism, agriculture, local businesses, emergency response, workforce productivity and business continuity during network or power outages.

BIRRR also encourages the Department to recognise projects that maximise long-term public value by delivering resilient, scalable infrastructure capable of supporting future technologies and changing consumer needs. Assessment should consider not only the immediate expansion of coverage, but also

the reliability, resilience, longevity and broader consumer benefits of the communications infrastructure being funded.

While BIRRR strongly supports the primary objective of expanding usable mobile coverage, where projects seek to add coverage in areas already served by one national MNO, applicants should demonstrate the additional public and consumer benefits the investment will deliver. This will help ensure Commonwealth funding is directed to projects that maximise coverage while also improving resilience, reliability and long-term public value.

Ultimately, BIRRR believes the strongest projects will be those that deliver enduring public value by combining improved connectivity with resilience, collaboration, evidence-based planning and long-term benefits for regional communities.

7. Transparency, Monitoring and Evaluation

BIRRR supports transparent reporting on the delivery and outcomes of the National RRAMP. Public confidence in the program will be strengthened if stakeholders can clearly understand where funding has been allocated, what outcomes are expected and whether those outcomes have been achieved.

BIRRR recommends that the Department maintain a publicly accessible register of funded projects identifying project locations, participating providers, funded infrastructure, expected coverage outcomes, resilience measures, implementation timeframes and project completion status.

Following deployment, projects should be independently evaluated to confirm that expected coverage, performance and resilience outcomes have been achieved. Public reporting of these outcomes would improve accountability, inform future investment decisions and support continuous improvement of the program.

Independent evaluation should assess not only whether coverage objectives have been achieved, but also whether projects have delivered the expected improvements in resilience, emergency communications capability and overall public benefit.

BIRRR recommends that funding agreements include minimum operational and reliability expectations for Commonwealth-funded infrastructure, together with mechanisms for monitoring performance and addressing persistent service issues where they arise. Experience from previous Commonwealth-funded mobile coverage programs, together with BIRRR's experience assisting regional consumers, has

demonstrated that the deployment of infrastructure alone does not necessarily guarantee a reliable consumer experience. In some locations, services delivered through satellite backhaul have experienced ongoing performance and reliability challenges despite infrastructure being in place. BIRRR has also observed that, despite ongoing consumer complaints, these issues have often been difficult to resolve. Ongoing operational performance and reliability should therefore form part of the long-term expectations for infrastructure funded under the National RRAMP.

Evaluation should also include verification that the funded infrastructure continues to operate in accordance with the approved resilience measures, including backup power capability, throughout the operational period.

The success of the National RRAMP should be measured not simply by whether infrastructure is deployed, but by whether it continues to provide reliable, resilient and usable communications for regional consumers throughout its operational life.

8. Resilience Measures

BIRRR welcomes the inclusion of resilience measures within the National RRAMP Guidelines. Reliable communications during emergencies and everyday use depend not only on network coverage, but also on the ability of telecommunications infrastructure to remain operational during prolonged disruptions.

BIRRR strongly supports the inclusion of minimum backup power requirements for infrastructure funded under the National RRAMP. However, we are concerned that the draft Guidelines require backup power only "where technically feasible", creating uncertainty about the circumstances in which this important resilience requirement may be waived.

Given the significant level of Commonwealth investment proposed under the National RRAMP, including funding of up to 100 per cent of eligible capital costs for some remote, multi-carrier projects, it is reasonable to expect that resilience requirements, including extended backup power, form part of the minimum project specification rather than optional enhancements. Project cost alone should not be accepted as a justification for excluding appropriate resilience measures from Commonwealth-funded infrastructure. Backup power should therefore be regarded as a mandatory design requirement for Commonwealth-funded infrastructure, not a feature delivered only where technically feasible.

BIRRR does not support the proposed minimum backup power requirement of 12 hours. In rural, regional and remote Australia, prolonged power outages regularly exceed 12 hours as a result of severe weather, equipment failures, planned maintenance and the challenges associated with maintaining extensive electricity networks across vast and often remote areas. Communications infrastructure funded through the National RRAMP should be designed to remain operational throughout these extended outages. BIRRR therefore recommends that the provision of a minimum of 72 hours of backup power be a mandatory condition of funding under the National RRAMP. Backup power should be incorporated into project design from the outset and should not be treated as an optional enhancement or be subject to a broad "where technically feasible" qualification.

Reliable telecommunications are essential not only during emergencies, but also for accessing health services, banking, business operations, education, transport and maintaining contact with family, neighbours and support networks. Loss of communications during extended power outages can have significant safety, economic and social impacts, particularly in remote communities.

BIRRR also encourages the Department to recognise broader measures of network resilience when assessing projects. Consideration should be given to infrastructure hardening, network redundancy, diverse backhaul where practical, rapid restoration capability and other design features that improve the ability of communications infrastructure to withstand and recover from extended disruptions.

Infrastructure operating in RRR Australia must be designed with the realities of those operating environments in mind, including prolonged power outages, extreme weather, remoteness and delayed access for maintenance and restoration. Telecommunications infrastructure should be no exception. Resilience and redundancy should be considered fundamental design requirements for Commonwealth-funded infrastructure, rather than optional enhancements.

The draft Guidelines also require funded infrastructure to remain operational for a minimum of 10 years. BIRRR considers it important that the minimum resilience requirements align with this long-term operational commitment. Infrastructure expected to provide reliable communications for a decade should be designed and funded to withstand the prolonged power outages that are routinely experienced across rural, regional and remote Australia. Ensuring appropriate backup power from the outset will help maximise the longevity, reliability and value of Commonwealth-funded infrastructure throughout its operational life.

The National RRAMP represents a significant investment in Australia's future communications infrastructure. Publicly funded infrastructure should set the benchmark for communications resilience, rather than simply meeting the minimum acceptable standard. Requiring a minimum of 72 hours of backup power for Commonwealth-funded infrastructure would significantly improve communications continuity during prolonged outages, strengthen emergency preparedness and maximise the long-term value of Commonwealth investment.