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This submission may be made public.

## Consultation on the draft Grant Opportunity Guidelines for the National RRAMP

Digital Soul Australia (DSA) welcomes the opportunity to comment on the draft Grant Opportunity Guidelines for the National Regional Roads Australia Mobile Program. We support the objectives of the Program and the non-competitive, demand-driven design. We intend to register as an applicant when the Program opens.

### About Digital Soul Australia

DSA is a licensed Australian telecommunications carrier (ACMA Carrier Licence No. 647) and mobile network infrastructure provider driving connectivity outcomes for regional and remote Australia. DSA owns and operates a portfolio of 40 tower sites across Western Australia, Victoria, Queensland and New South Wales, comprising a mix of in-service structures and shovel-ready planned sites originally developed under the Regional Connectivity Program and the Mobile Black Spot Program. DSA operates its own fixed wireless and microwave backhaul networks, a national network operations centre, and in-house site acquisition, design, construction and commissioning capability.

Our portfolio sits on and around regional highway corridors in the exact coverage conditions the Program targets: areas served today by one national mobile network operator, or by none. DSA's feedback reflects our practical experience in acquiring, building and operating this class of infrastructure.

### Summary of recommendations

1. Base project eligibility on new multi-carrier coverage of Eligible Roads, with Strategic Locations treated as a merit consideration rather than an eligibility gate, and define a common coverage measurement standard for assessing it.
2. Align the evidence of intent requirement for MNIP-owned sites with the one-new-carrier funding tiers, and confirm how shared-network (MOCN) deployments are counted.
3. Confirm equal treatment of MNIPs and MNOs for operational cost funding, including the backhaul that enables coverage at a site.
4. Accept letters of intent at application and allow six months to reach binding commitments.
5. Recognise shovel-ready costs incurred from the release of the draft Guidelines, and documented historical costs for existing consented sites.

6. Include Secondary roads as standard in the initial Eligible Locations Database, streamline the additional road nomination process, and publish the Database with the final Guidelines.
7. Provide flexibility in the registration window, transparency in the funding allocation methodology, and safeguards against the reservation of funding without a genuine project pipeline.
8. Direct scarce Commonwealth funding to coverage the market will not otherwise deliver, and prioritise new multi-carrier coverage over technology upgrades that operators have already committed to fund.

We also seek two points of clarification, set out immediately below: how the ABS remoteness classes map to the Program's regional and remote funding tiers, and how a shared-network (MOCN) deployment is counted when assessing the number of mobile network operators at a location.

## Requests for clarification

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**Remoteness classes and funding tiers.** The draft Guidelines apply the Australian Bureau of Statistics Remoteness Structure (Australian Statistical Geography Standard, Edition 3, 2021 to 2026), which defines five remoteness classes: Major Cities, Inner Regional, Outer Regional, Remote and Very Remote. The Program's funding tiers turn on whether a location is "regional" or "remote", but the draft does not state which ABS classes fall into each tier. We ask the department to confirm that both Inner Regional and Outer Regional Australia are treated as "regional" for the funding tiers. This matters directly to applicants: every site in DSA's portfolio falls within the Outer Regional, Remote and Very Remote classes the Program targets, with a substantial share in Outer Regional Australia, and the funding tier that applies to those sites should not be left to interpretation.

**Counting of shared-network (MOCN) deployments.** Optus and TPG Telecom operate a Multi-Operator Core Network (MOCN) arrangement across regional Australia, under which TPG's services are carried over Optus's active radio infrastructure at approximately 2,444 regional sites, live since 30 January 2025 (an arrangement the ACCC did not oppose). This creates a definitional question the draft Guidelines do not resolve. Where a single active deployment at a site delivers services for two carriers under a MOCN, we ask the department to confirm whether that counts as one mobile network operator or two, both for the eligibility test (the number of operators serving an area today) and for the funding tiers (the number of new carriers a project delivers). The answer materially changes which projects are eligible and at what funding rate, and applicants need it before committing to project development.

## 1. Eligibility should follow road coverage, not point locations (Sections 5.1.1, 5.2.3)

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The Program objective in Section 2 is to increase multi-carrier mobile coverage on regional highways and major roads to improve safety, support emergency response and strengthen regional economies. Road crashes, breakdowns, medical emergencies and natural disaster events occur along the length of a corridor. They are not confined to rest areas, campgrounds or public toilets.

The draft Guidelines nevertheless make eligibility contingent on a project being located at, or providing coverage to, a listed Strategic Location type within 500 metres of an Eligible Road. In our view this inverts the policy intent. A macro site engineered for corridor coverage will typically cover 10 to 30 kilometres of highway, together with any rest stops, service centres and tourist sites that happen to fall within that footprint. Gating eligibility on the presence of a listed point location risks excluding high-benefit corridor projects where no mapped rest area or public toilet exists nearby, which is common on exactly the remote corridors the Program is designed to serve. It also creates definitional uncertainty for applicants, since the Database will not include all Eligible Strategic Locations.

Related to this, the draft does not define how coverage is to be measured. Section 5.1.1 refers to the latest ACMA network coverage maps, but it does not set the signal level applicants should use, the map resolution operators should provide, or the way the department will measure the coverage a project delivers when assessing submissions. Without a common standard, applicants and the department will be comparing coverage claims prepared on inconsistent bases, and there is no objective measure of the road length a project improves.

**Recommendation 1:** Make a project eligible where its predictive coverage delivers new multi-carrier coverage to a defined minimum length of an Eligible Road (for example, five kilometres of contiguous corridor). Treat coverage of Strategic Locations as a positive factor within the assessment criteria and the value with relevant money assessment, not as an eligibility gate. Alternatively, at minimum, confirm that a project qualifies where any part of its predictive coverage reaches one or more Strategic Locations, that a single site may count multiple Strategic Locations, and that the infrastructure itself may be located beyond 500 metres from the road.

**Recommendation 1a (coverage measurement standard):** Adopt and publish a common coverage measurement standard for the Program, comprising: (a) a defined external signal threshold of -95 dBm reference signal received power, which allows roughly 15 dB for in-vehicle penetration loss and so reflects the in-car usability a road-safety program is concerned with, rather than an open-air handheld measure; (b) a standard predictive resolution of 20 metres by 20 metres from all operators, a resolution operators already produce; and (c) a headline assessment measure expressed as the kilometres of Eligible Road brought to new multi-carrier coverage, so that projects can be compared on a like-for-like basis and value for money can be assessed objectively. A defined measure of this kind also supports the corridor-based eligibility in Recommendation 1.

We further note that the Program's purpose is to deliver mobile coverage where the market will not, on roads that today have coverage from one operator or none. Consistent with that purpose, Commonwealth funding should be directed to new coverage and new-carrier outcomes. Technology upgrades that operators have already publicly committed to fund, such as the current 4G to 5G rollouts in regional Australia, deliver limited additional road-coverage benefit and are already privately funded. We support prioritising, within eligibility and the value for money assessment, projects that extend coverage to unserved or single-operator corridors or that add a carrier, over projects that only refresh technology at locations already served.

## 2. Evidence of intent parity for MNIP-owned sites (Section 5.1.5)

Section 3.1 sets out funding tiers for upgrades that deliver one new carrier (60 per cent regional, 85 per cent remote). However, Section 5.1.5 requires evidence of intent from at least two MNOs wherever the site is owned by an MNIP, reserving the single-MNO pathway for sites owned by an MNO that already delivers service. As drafted, an MNIP-owned upgrade that brings one new carrier to an area with existing single-operator coverage appears to be excluded, while the identical project on an MNO-owned site proceeds. This treats identical coverage outcomes differently based only on who owns the structure, and it disadvantages the neutral host model that most efficiently delivers multi-carrier outcomes on thin regional routes.

This question interacts with the MOCN clarification above. Where the single existing operator at a location is an Optus or TPG service delivered over the shared MOCN infrastructure, the treatment of that arrangement determines whether adding another operator is a one-new-carrier or two-new-carrier outcome. A neutral host site that brings a second independent network to a MOCN-served corridor delivers a genuine competitive and resilience benefit, and the evidence-of-intent and funding-tier rules should recognise it as such.

**Recommendation 2:** Where a location has existing coverage from one national MNO, accept evidence of intent from one additional MNO regardless of site ownership, consistent with the one-new-carrier funding tiers, and confirm that a deployment adding an independent network alongside a MOCN-served operator is recognised as delivering a new carrier.

## 3. Equal treatment of MNIPs for operational funding (Sections 3.1, 5.3)

DSA supports the inclusion of capitalised operational costs in the Total Project Cost. We ask the department to confirm that eligible operational costs are funded on the same basis whether incurred by an MNO or by an MNIP as site owner and operator. On neutral host sites the MNIP carries the site operating costs (power,

backhaul, maintenance, land access) that make multi-carrier service viable, and the economics of thin regional corridors affect MNIPs and MNOs alike. This position was put by several parties in the 2025 design consultation and we endorse it.

Backhaul warrants specific mention. On the thin regional and remote corridors this Program targets, there is frequently no fibre and no third-party transmission available, so the coverage a site delivers depends entirely on the backhaul that carries it. Backhaul provisioned to enable coverage at a funded site is therefore an intrinsic and unavoidable cost of that coverage, not a discretionary network expansion, and it should remain eligible as part of the Total Project Cost on the same basis as any other site cost. We recognise the distinction between backhaul that serves a coverage site and standalone transmission expansion with no direct coverage outcome, and we would not expect the latter to compete with coverage projects for Program funds. But the two should not be conflated: excluding the backhaul that a coverage site cannot operate without would simply make otherwise sound corridor projects unviable, defeating the Program's purpose. DSA operates its own microwave and fixed wireless backhaul networks and builds and commissions this class of infrastructure in house, so we make this point from direct operating experience.

**Recommendation 3:** Confirm in the final Guidelines that MNIP-incurred operational costs are eligible on equal terms with MNO-incurred costs across all funding tiers, and that backhaul provisioned to enable coverage at a funded site is an eligible project cost.

#### 4. Evidence of intent form and binding timeframe (Section 5.1.5)

We support the requirement to demonstrate genuine MNO commitment. However, requiring binding commercial commitments within three months of award does not reflect the reality of MNO decision cycles, where site-specific agreements routinely take six months or more to execute even after commercial terms are agreed in principle. A short window puts well-founded projects at risk of funding withdrawal for reasons outside the applicant's control.

**Recommendation 4:** Accept letters of intent or heads of terms at application, and allow six months from advice of award to execute binding commitments, with a discretionary extension where the applicant demonstrates active negotiation. Alternatively, structure the binding commitment as a condition precedent to first payment under the Grant Agreement.

#### 5. Recognition of shovel-ready costs (Section 5.3.2)

DSA strongly supports the shovel-ready reimbursement of up to \$80,000 per project. However, the draft excludes all costs incurred before the release of the final Guidelines. Applicants who invested early to bring sites through site acquisition, environment and design, including sites originally consented under other Commonwealth programs and since completed at private cost, are penalised relative to applicants who have not yet started. This creates a perverse incentive to pause development work during the consultation and assessment period, which is contrary to the Program's shovel-ready design.

**Recommendation 5:** Make shovel-ready costs eligible from the release of the draft Guidelines (10 July 2026). For sites that are already consented and construction-ready, allow documented historical costs of the kinds listed in Section 5.3.2 to be claimed up to the same cap.

#### 6. Road nominations and the Database (Sections 5.2.1, 5.2.2)

Many corridors of genuine safety and economic significance in regional Australia are classified below Trunk and Primary in the Open Street Map hierarchy, particularly grain freight routes and connector roads between regional centres. As the initial Eligible Roads database is defined only as the Trunk and Primary classes, many of these corridors are excluded from the outset and can be reached only through the additional road nomination process. That process is therefore important, and its usefulness will depend on turnaround time and the practicality of obtaining state endorsement.

We consider the Secondary class should be included as standard in the initial database. Secondary roads in the OpenStreetMap hierarchy include a large share of the inter-town connector and freight routes that carry regional traffic and where road-safety and economic benefits are concentrated. Including them from the outset would capture a substantial part of the network the Program is intended to serve, and would reduce the volume of individual road nominations the department and applicants would otherwise have to prepare and assess, avoiding unnecessary administrative load on both sides.

**Recommendation 6:** Include the Secondary road class as standard in the initial Eligible Locations Database, in addition to Trunk and Primary. Publish the Database at the same time as the final Guidelines so applicants can plan registration and applications. Commit to a published service standard for road nomination decisions (for example, 20 business days), and allow an applicant's nomination to proceed in parallel with, rather than strictly after, state or territory endorsement.

## 7. Registration and funding allocations (Sections 3.4, 7.1)

We support pro-rata funding allocations as a means of giving smaller applicants certainty. To make this work in practice we ask that the department publish the allocation methodology, keep late registration genuinely open where funding remains, and ensure quarterly reviews reallocate promptly from registrants without a project pipeline to those with applications in preparation.

We note one risk in a non-competitive model that allocates a funding amount at registration, ahead of a registrant nominating specific locations and confirming MNO outcomes. Without safeguards, a registrant could hold, or land-bank, an allocation without advancing genuine projects, tying up scarce funds that other applicants with shovel-ready projects could use. This risk is best managed not by penalising early movers, but by tying continued access to an allocation to demonstrated progress. We are strong supporters of the shovel-ready emphasis throughout the draft, and consider that operators who have already invested to bring sites to a construction-ready state are exactly the certainty the Program should reward.

**Recommendation 7:** Publish the allocation methodology with the final Guidelines, and confirm the criteria the department will use in quarterly reallocation decisions. Include an explicit safeguard against the reservation of funding without a genuine pipeline, for example by making the continuation of an allocation conditional on demonstrated project progress within defined periods, and reallocating dormant allocations to applicants with projects ready to proceed.

## 8. Funding should target coverage the market will not otherwise deliver

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The Program's value depends on Commonwealth funds being directed to coverage that would not happen without them. Earlier Commonwealth connectivity programs required applicants to warrant that a proposed site was not already within a mobile network operator's committed forward plans, so that public money was not spent on infrastructure industry intended to build in any event. That safeguard is absent from the draft Guidelines.

Restoring it would protect the integrity and reach of a limited \$30 million program. It is consistent with the Program's own emphasis on addressing gaps the market has not closed, and it is consistent with the prohibition on double-funding a site already funded under another Commonwealth or state program. We are mindful that any such warranty must be framed around operators' committed commercial plans, and must not exclude the shovel-ready sites that neutral host operators have developed precisely because the mobile network operators were not planning to serve them. Those sites are the Program's opportunity, not its target for exclusion.

**Recommendation 8:** Reinstate a requirement that applicants warrant a proposed project is not already within a mobile network operator's committed forward plans as at 1 July 2026, framed so that it excludes sites industry intended to fund privately while preserving the eligibility of shovel-ready neutral host sites developed to serve corridors the operators were not otherwise addressing.

## Closing

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The National RRAMP is well designed to mobilise existing regional infrastructure operators, and DSA looks forward to registering and bringing shovel-ready projects to the Program in its first year. We would welcome the opportunity to discuss any aspect of this submission.

Yours sincerely,



**Richard Fear**

Managing Director, Digital Soul Australia

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