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DITRDCA
National Regional Roads Australia Mobile Program Team
Via email: MobileCoverageRoads@infrastructure.gov.au

Indara Submission on National Regional Roads Australia Mobile Program (National RRAMP) Guidelines Consultation

I write on behalf of Indara concerning the National Regional Roads Australia Mobile Program (National RRAMP).

The National RRAMP's objective of improving mobile coverage in regional and remote Australia is worthy and commendable. Indara strongly support these outcomes. We are broadly supportive of the program and are interested in participating.

Having reviewed the *Draft Opportunity Guidelines*, Indara consider that certain requirements will either make the program less desirable for MNOs and MNIPs to participate, or limit the program's effectiveness. The following provides some background on our experience and feedback on these issues. We trust that this will be helpful for the Department.

Who is Indara?

Indara is a leading independent owner and operator of digital infrastructure, with a network of over 4,700 tower and rooftop sites across Australia. Indara is a neutral host Mobile Network Infrastructure Provider (MNIP) – we do not operate a mobile network, but rather build and maintain the infrastructure used by Australia's Mobile Network Operators (MNOs), government entities, emergency services organisations and wireless providers.

Indara have been deploying mobile network infrastructure across Australia for over 25 years. We have participated in several federal and state telecommunications funding programs including the Mobile Black Spot Program (MBSP), the Peri-Urban Mobile Blackspot Program (PUMP) and RRAMP programs across several states.

Feedback on National RRAMP

At a high level Indara is strongly supportive of the National RRAMP. The economics of deploying telecommunications facilities in regional and remote areas are challenging, and Federal funding significantly increases the viability of these projects – the support of the Federal government in servicing these areas is most welcome. We are also pleased to note that upgrades of existing facilities qualify for funding. Indara has a wide network of established facilities across regional Australia that are co-location ready, and welcome the opportunity to make these available to MNOs.

We have identified several issues are likely to impact the viability of the National RRAMP. We trust that this feedback will be helpful.

Funding Tied to Number of Carriers

Sites on National RRAMP – whilst obviously having significant community benefit – rely on federal funding because they would not make commercial sense otherwise.

Grants are available for between 60% and 100% of the Total Project Cost – but critically 100% funding is only available for new towers where all three carriers are included.

While we appreciate the intent of this tiered structure, we anticipate most sites on the program will not meet the three-carrier threshold for full funding (the needs of the three carriers are very different).

We anticipate that the lower funding tiers will act as a disincentive to industry when the sites being proposed are economically marginal. If full funding is not available, there is a lower likelihood of participation.

The Department should also consider whether the Guidelines, in their current form, unintentionally favour MNOs with a higher proportion of existing sites in regional areas, giving them more ability to influence the site selection process.

Indara's recommendation is to revert to the MBSP model where 100% funding is available based on the merits of the site, and inclusion of all three carriers is desirable but not mandatory.

“Shovel Ready Infrastructure”

To be ‘Shovel Ready’ under 5.1.3, the applicant must have all required approvals and be ready for Construction on execution of the Grant Agreement (including tenure, all relevant planning and building approvals, agreed access and secured power).

This is a significant problem for the industry. Sites on this program will not be viable without government co-funding. Presently, all the risk is placed on the applicant with no guarantee that the project will be funded.

Planning for new mobile infrastructure is a complex and time-consuming task involving multiple disciplines (tenure, town planning, build, radiofrequency engineering and so on). Substantial costs are often incurred during this process, and it can multiple years.

Given sites on this program are economically marginal, it is unlikely an applicant would embark on this process without some certainty of co-funding. No certainty is being offered under the current model – indeed 10.1 states that *“Any work undertaken on your project before you have an executed Grant Agreement is done at your own risk.”*

There are also some practical impacts we believe should be considered.

- Landowners may be hesitant to agree to a lease if there is no certainty a site will be built. For the same reason, applicants may be unable to carry out the legal processes required to formalise access easements or covenants on title.
- There is potential for the town planning process to be materially impacted by this requirement. Councils assess developments against a range of criteria, including public benefit – if they become aware that a site is speculative, and cannot proceed without grant funding, this may prejudice their assessment.
- DAs often require expensive supporting reports and assessments (geotechnical investigations, aboriginal heritage investigations, ecological and arborist assessments etc). This information must be provided to Council ahead of a planning decision. Indara has had sites that have cost over \$100,000 just in external expert reports supporting the DA. We expect it will be difficult to attract applicants willing to commit this level of expenditure without assurance that the site will be approved for funding.
- In Victoria, there are specific ‘Clause 52.19’ provisions to streamline approvals for government funded sites (such as being “Exempt from Notice and Review”). If funding isn’t confirmed, these exemptions may not be available, meaning applications could take longer and be subject to more prohibitive requirements.

“Shovel Ready Infrastructure” (cont’d)
Members of the public will inevitably become aware of proposed facilities (either through the DA process or other means). The current model represents a reputational risk to applicants who may have an approved DA in hand, but cannot act on it without co-funding. This outcome will be frustrating for community members who may miss out on the significant benefits afforded by reliable, high-quality connectivity. The Department should also consider whether the Shovel Ready requirement unintentionally advantages MNOs with large real estate holdings, which offer a pipeline of potential sites unavailable to other applicants. We consider the MBSP model, where proposals are presented to the Federal government and funded on merit, is a fairer and more balanced approach than the model offered here, offering more certainty and less risk for all parties. A higher level of industry participation would be expected under the MBSP model. If National RRAMP proceeds under the current model, we would like to see some form of “pre-approval” process where applicants could present proposals to the Federal Government for in-principle support before committing to a long and expensive acquisition process. This would allow applicants to gauge if the risk is worthwhile, and there is a reasonable likelihood of funding approval, before committing. It would also enable applicants to take advantage of relevant planning exemptions for government funded projects.
Costs Before ‘Shovel Ready’ Stage
The process to get a site to a ‘shovel ready’ stage can be extremely costly. 5.3.2 provides that the program will pay up to \$80,000+GST in costs – however these costs will only be paid as part of a successful application. Applicants may not be willing to take the risk of acquiring a site if there is no certainty of its acquisition costs being recouped (a “pre-approval” process as mentioned above could be helpful here). This amount is also low considering the actual costs that are incurred securing a site. Applicants will expend significant time and financial expense scoping for potential sites, undertaking site visits, doing the legal work necessary to secure tenure, preparing engineering drawings and securing planning consent. When a single ecologist’s report can cost over \$20,000, the funds offered in the program may not be sufficient to incentivise applicants. We recommend the cap be raised subject to “reasonable costs incurred”. The guideline also states that “<i>Costs incurred prior to the release of these Guidelines are not eligible.</i>” The window for the program is relatively small and applicants may have sites in their forward plan which would be eligible for this program; this condition appears to exclude such sites. To increase likelihood of program success, we suggest backdating this requirement by 1-2 years, which would allow sites in an applicant’s forward plan to be eligible. This will be beneficial for applicants, but will also mean a pipeline of accelerated sites for this program, increasing its success.
Application Timeframes
We understand that funding will be available over three financial years (FY26-27 to FY28-29) and an 18-month timeframe (from Grant Agreement) is provided for project completion. The front-end process to acquire a site (such as obtaining regulatory consent) can take multiple years to complete. Given the ‘Shovel Ready’ requirement, we anticipate that the Department will receive a significant proportion more applications in the late stages of the program. The final build deadlines should have sufficient lead time for projects receiving funding in FY28-29.
Contractual Complexity
Under the MBSP a single application is submitted covering multiple sites. It is understood that under this program, multiple applications will be submitted. This will mean multiple grant agreements, each coming with its own obligations and reporting requirements. The management of these may be complex.

The Department may want to consider consolidating all applications into one master grant agreement for consistency and simplicity. It also may want to consider how reporting requirements are managed across many individual grant agreements.

Capital Expenditure

Per 5.3.1, capital expenditure must only include works undertaken between the start and completion dates in the grant agreement.

Procurement practices for the telecommunications industry may render many parts of a facility ineligible. For example, Indara may have a prefabricated tower available for use on the RRAMP program, which would speed up delivery, but the capital costs of the tower would be ineligible because it was procured prior to the Grant Agreement.

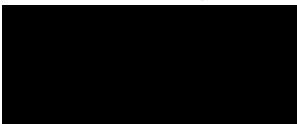
Similarly, MNOs generally have a stockpile of antennas, cabling and other similar equipment that would be ineligible for funding on this basis, because they were not specifically ordered for the RRAMP program.

Clarification is sought over how these costs would be regarded, and if there is a “reasonable exceptions” approach that will be adopted by the government.

Indara note that the National RRAMP is well intentioned and represents a strong step toward connecting regional Australia. However, we believe that some of the requirements will disincentivise mobile providers – we feel that minor changes could significantly strengthen the value and effectiveness of this program.

We trust that this feedback will be helpful to the Department and would be happy to assist further. Please don’t hesitate to contact me if you have any questions or require further information.

Yours sincerely,



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