

RAPAD Submission to the National Regional Roads Australia Mobile Program Draft Grant Opportunity Guidelines

The Central Western Remote Area Planning and Development Board (RAPAD) welcomes the opportunity to provide feedback on the draft National Regional Roads Australia Mobile Program (National RRAMP) Grant Opportunity Guidelines.

RAPAD represents the seven local governments of Central West Queensland. Together, the RAPAD councils cover approximately 396,609 square kilometres—22.9 per cent of Queensland’s land area—and include some of Australia’s most remote communities and important freight, tourism, community-access and emergency-management corridors.

The Queensland Government’s Central West transport district, which closely aligns with the RAPAD region, contains approximately 4,385 kilometres of state-controlled roads, in addition to an extensive network of council-controlled roads connecting communities, properties, tourism destinations and essential services.

This submission has been prepared from the perspective of Remote and Very Remote local governments. While the National RRAMP presents a significant opportunity to improve mobile connectivity, the commercial and operational realities of delivering telecommunications infrastructure in remote Australia differ considerably from those in more populated regions.

Improved mobile coverage can deliver substantial benefits for traveller and road safety, emergency response, freight productivity, tourism, economic development and community resilience. Without sufficient flexibility, however, there is a risk that the locations experiencing the greatest connectivity disadvantage will be the least likely to benefit from the program.

RAPAD proposes six recommendations to strengthen the National RRAMP by recognising local government as a delivery partner, leveraging established regional planning and ensuring the program reflects the realities of Remote and Very Remote Australia.

1. Recognise Local Government and Regional Organisations as Delivery Partners

The draft Guidelines primarily recognise local governments as project endorsers. RAPAD considers local governments and Regional Organisations of Councils (ROCs) should instead be recognised as active partners in identifying priorities, facilitating project development and supporting delivery.

As the owners and managers of many regional and local roads, local governments have detailed knowledge of road networks, traveller movements, freight routes, emergency-management priorities, tourism destinations and future regional development. ROCs add value by coordinating priorities across council boundaries and providing a regional point of engagement for governments and telecommunications providers.

Early engagement is particularly important because applicants must progress projects to the shovel-ready stage before lodging an application. Seeking council endorsement only after locations and technical solutions have largely been settled limits the opportunity for local knowledge to influence project design and prioritisation.

Recommendation 1

The National RRAMP should:

- require applicants to demonstrate early engagement with the relevant local government and, where applicable, the relevant ROCs before finalising project locations and progressing projects to the shovel-ready stage;
- recognise local governments and ROCs as partners in identifying priority roads and strategic locations;
- make the Eligible Locations Database and its supporting methodology publicly available, and notify affected councils when roads or locations within their areas are added or amended;
- provide a formal mechanism for local governments and ROCs to nominate additional council-controlled roads and identify priority strategic locations for consideration;
- provide councils and regional organisations with access to independent coverage information and proportionate technical support to assess proposed coverage, power, backhaul, infrastructure-sharing and long-term community outcomes; and
- clarify that local government endorsement does not create an obligation to provide a financial contribution, land, power or other infrastructure.

2. Leverage Existing Regional Planning Frameworks

The National RRAMP provides an opportunity to use regional planning already undertaken by local governments and state agencies, rather than duplicating this work through individual project assessments.

In Central West Queensland, the Outback Regional Roads and Transport Group (ORRTG), established under Queensland's Roads and Transport Alliance, has identified priority freight, tourism, disaster-resilience and community-access routes through its Regional Road Hierarchy. This is an example of an established, collaborative evidence base that can support telecommunications investment decisions across local government boundaries.

Recognising these frameworks would strengthen project identification, assist in maintaining the Eligible Locations Database and align telecommunications investment with wider regional transport and economic-development priorities.

Recommendation 2

The National RRAMP should recognise established regional planning mechanisms, including Regional Roads and Transport Groups, when:

- maintaining and updating the Eligible Locations Database;
- identifying future investment priorities;
- validating proposed additional roads and strategic locations;
- assessing evidence of regional need and strategic alignment; and
- informing future program design and evaluation.

The ORRTG Regional Road Hierarchy is provided at Appendix A as an example of the strategic regional planning available to support the National RRAMP.

3. Recognise the Commercial Realities of Remote and Very Remote Australia

RAPAD supports the program's objective of increasing multi-carrier mobile coverage and consumer choice. However, the draft Guidelines require new infrastructure in an area with no existing coverage to deliver services from at least two Mobile Network Operators and to include evidence of intent from at least two operators.

In some Remote and Very Remote locations, securing a commercially binding commitment from a second carrier may not be achievable. In these circumstances, a project capable of delivering reliable coverage from one carrier may still provide a transformational improvement over having no coverage at all.

RAPAD is concerned the absence of a second willing carrier could leave some of the locations with the greatest connectivity disadvantage ineligible for support. Any flexibility should preserve the objective of future competition and ensure publicly funded infrastructure is designed for practical co-location.

Recommendation 3

The National RRAMP should:

- retain multi-carrier coverage as the preferred outcome wherever achievable;
- provide a clearly defined exception pathway where transparent market testing demonstrates only one carrier is willing to participate and the project would deliver significant public benefit;
- require infrastructure approved through an exception pathway to be designed to facilitate future carrier co-location on fair and reasonable terms; and
- assess the success of remote projects by the practical coverage, safety and community benefits delivered, as well as the number of participating carriers.

4. Ensure the Funding Model Does Not Disadvantage Remote Projects

The draft Guidelines propose pro-rata funding allocations for registered applicants, quarterly reviews of those allocations and rolling assessment of projects once they are shovel-ready. RAPAD recognises the benefits of providing certainty and supporting timely delivery, but these arrangements may favour locations that are quicker and less complex to develop rather than those with the greatest connectivity disadvantage.

Remote projects can require more time to resolve land access, power, backhaul, environmental and heritage approvals, and commercial participation. The program should ensure this additional complexity does not prevent high-priority remote projects from progressing.

Recommendation 4

The National RRAMP should:

- publish the criteria used to review and, where necessary, redistribute applicant and jurisdictional funding allocations;
- consider remoteness, demonstrated regional need, public benefit, project-development complexity and alignment with established local and regional planning during funding reviews;
- give appropriate weight to credible remote projects that are progressing through approvals but have not yet reached the shovel-ready stage; and
- retain sufficient flexibility to support high-priority remote projects with a longer development pathway.

5. Strengthen the Assessment Criteria

RAPAD supports the proposed assessment criteria and recommends they more clearly recognise traveller safety and the value of local and regional planning.

Mobile coverage may not change the physical condition of a road, but it can materially improve the safety of road users by enabling access to emergency assistance, incident reporting, recovery support and critical information during natural disasters. The assessment criteria should retain road safety while expressly recognising these broader traveller-safety outcomes.

Projects demonstrating meaningful engagement with local governments, ROCs and established regional planning processes should also be recognised as providing stronger evidence of regional need and strategic alignment.

Recommendation 5

The assessment criteria should:

- expand references to road safety to expressly include traveller safety, access to emergency communications, incident response, recovery and critical information during natural disasters; and
- recognise meaningful local government engagement and alignment with established regional planning as evidence of project merit.

6. Strengthen Infrastructure Resilience

The draft Guidelines require a minimum of 12 hours of backup power where technically feasible. RAPAD considers this may be inadequate at remote and high-risk locations, where floods, severe weather, road closures and long travel distances can delay site access, repairs, refuelling and restoration.

Communications are most critical when communities, properties and travellers are isolated and other services are disrupted. Resilience requirements should therefore reflect the risk profile and likely restoration time of each location rather than applying a uniform minimum standard.

Recommendation 6

The National RRAMP should:

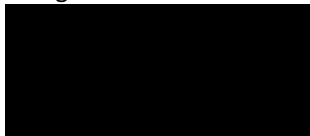
- apply a risk-based resilience standard to funded infrastructure;
- require at least 72 hours of backup power at remote and high-risk locations wherever technically practical;
- require applicants proposing less than 72 hours of backup power at these locations to explain why a longer period is not technically feasible and how service continuity will otherwise be maintained; and
- consider infrastructure hardening, diverse or redundant backhaul, remote monitoring, emergency refuelling, alternative power arrangements, disaster access constraints and priority restoration arrangements.

The National RRAMP presents a significant opportunity to improve mobile connectivity across Remote and Very Remote Australia and to deliver lasting benefits for road and traveller safety, emergency response, economic development and community resilience.

Local governments and ROCs can contribute detailed local knowledge, established regional planning and practical delivery support. Recognising them as genuine partners—while maintaining clear responsibility for technical design and delivery with telecommunications providers—will improve project identification, strengthen regional collaboration and help ensure investment reaches the communities and transport corridors with the greatest need.

By combining this partnership approach with appropriate flexibility for remote markets, fair funding settings, strengthened assessment criteria and risk-based resilience requirements, the Australian Government can maximise the public benefit of the National RRAMP.

Regards



Morgan Gronold
Chief Executive Officer

Appendix A – ORRTG Regional Road Hierarchy

