

16th July 2026

**Department of Infrastructure, Transport, Regional Development,
Communications, Sport & the Arts**

Via Email - MobileCoverageRoads@infrastructure.gov.au

Dear Team RRAMP,

RE: Draft guidelines for the National RRAMP feedback submission

Tusen Takk Consulting (TTC) welcome the opportunity to provide feedback on the draft guidelines issued 10th July 2026.

Regional Clarification	The draft guidelines (DG) reference the ABS Remoteness Structure of 2021. This structure has 6 defined areas. With regard to the DG, can you please clarify that both eh ABS defined regions of “Outer Regional Australia” and “Inner regional Australia” are considered “Regional” in the DG.
Number of MNO clarification	In determining the number of MNOs per site, can the department please confirm if the Optus/TPG MOCN is to be considered two carriers.
Funding for 5G Upgrades	Considering the carriers have publicly announced the national rollouts of their 5G networks, it is questionable if Commonwealth funds should subsidise such upgrades. Furthermore, the nature of a 4G to 5G upgrade offers minimal benefits within a road connectivity programme.
Funding of backhaul Upgrades	Given the nature of the programme is to provide enhanced road coverage, allocating money towards expansion of backhaul connectivity appears to be bespoke from the program’s objective. Whilst acknowledging that every new site requires backhaul connectivity, in a programme of limited funding, this is sure to have an impact of cumulative coverage outcomes.
MNO’s Forward 3-year Plans	Previous connectivity projects have specifically required applicant to warrant that proposals are not subject to their forward 3-year plans. This clause is absent from the DG. TTC firmly believe scare Commonwealth funding should not be allocated to sites that are already factored in for private funding.

	TTC also suggest that the final guidelines should ensure that no proposals within MNO/MNIP forward 3-year plans should be warranted as of the 1 st July 2026.
Carrier Coverage	Clarification is sought on how the Department & Applicants shall determine coverage. Whilst 5.1.1 references the latest ACMA issued network coverage maps, it does not define the levels applicants should use. Furthermore, in the departments assessment of submissions, there appears to be no “measure” such as distance of subject road with enhanced/new coverage. TTC recommends that -95dBm be used given this is a level to allow for up to 15 dBm of losses for in car penetration given programs objective. TTC also strongly recommends that the resolution of the maps should be 20m by 20m (Free data!) by all operators.
Eligible Roads	TTC note that whilst the initial database of eligible roads is yet to be published, it is defined per Open Street Map hierarchy of roads classified as Trunk and Primary. TTC strongly recommends the inclusion of “Secondary” as standard. Whilst TTC notes that applicants can submit additional roads, it may be prudent to avoid “paperwork overload for the Department” to include this classification in initial release.
Funding Allocations	TTC welcomes a revised allocation of grants in this proposed non-competitive program. With that said, TTC would welcome a greater explanation of how this will be managed within a \$30M program. For example, how can the department ensure that applicants cannot “landbank” allocations of funding? Whilst it is noted the strong references to “Shovel ready” throughout the DG, applicants, if successful at first gate, are allocated a budget amount <i>ahead</i> of nominating a location and confirming MNO outcomes ahead of next stage? TTC appreciates the intention of securing more certainty to the communities and constituents that will benefit from Commonwealth funding, especially when factoring in what

	can be very long acquisition timelines for asset applicants. With minimal certainty of expanded funding under the program, this may also limit private investment of reaching that “Shovel ready” status given lack of certainty on being awarded further grant funding to complete projects. A balance between “Shovel Ready” projects and “absolute Greenfields” should be considered, perhaps with a timing cap for acquisitions?
--	--

For further clarification of the feedback provided, please do not hesitate to reach out.

Yours Sincerely

[Redacted Signature]

[Redacted Name]

[Redacted Title]

[Redacted Contact Info]

[Redacted Address]

This submission can be made public with following redactions:

Signature Block

Telephone Number

Street Address