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Submission on Draft National Regional Roads Australia Mobile Program Grant Opportunity Guidelines

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About Waveconn

Waveconn is an Australian developer, owner, and neutral host operator of digital infrastructure, and one of the three major mobile network infrastructure providers (MNIPs) in the country. Established in 2022 following the Ontario Municipal Employees' Retirement System's (OMERS) acquisitions of TPG's tower and rooftop portfolio and Stilmark Holdings Pty Ltd (Stilmark), Waveconn owns approximately 1,700 tower and rooftop sites nationwide, with additional sites under active development.

As an MNIP, Waveconn's core business involves deploying and managing digital infrastructure for a diverse range of clients, including all three national mobile network operators (MNOs), Government radio networks (GRNs), and wireless internet service providers (WISPs).

While our existing infrastructure is predominantly located in metropolitan areas, we are actively supporting our customers' plans to expand coverage in regional and remote parts of Australia. We are also focused on delivering wireless infrastructure to new residential developments, ensuring digital connectivity keeps pace with demand.

Waveconn operates independently, with no direct MNO ownership or funding. This autonomy allows us to provide access to all our customers without any incentives aligning us to a specific MNO. With two of our subsidiaries holding a carrier licence, Waveconn is classified as a carrier company group under the Telecommunications Act 1997 (Cth).

1. Introduction

Waveconn welcomes the opportunity to respond to the draft Grant Opportunity Guidelines for the National Regional Roads Australia Mobile Program (National RRAMP or Program).

Waveconn supports the core policy and delivery framework, including the federally administered rolling process, the eligibility of Mobile Network Operators (MNOs) and Mobile Network Infrastructure Providers (MNIPs), the ten-year Operational Period and the requirement for projects to be shovel-ready before funding is awarded.

Purpose of this submission

This submission proposes targeted operational amendments rather than a fundamental redesign of the Program. The recommendations are intended to reduce avoidable cost, delay and legal administration while preserving the Program objectives, eligibility framework and value with relevant money requirements.

Waveconn recommends amendments in five areas: shovel-ready expenditure, financial auditing, the contracting model, funding for new two-MNO sites and the maximum Grant Period.

2. Summary of Recommendations

Waveconn recommends that the final Guidelines and Grant Agreement provide as follows:

1. **Shovel-ready expenditure:** Fund 100% of all reasonable and directly attributable costs incurred to achieve shovel-ready status for a project that secures National RRAMP funding, irrespective of when those costs were incurred. Remove the \$80,000 cap.
2. **Financial auditing:** Require one consolidated independent financial audit after the end of FY2028-29, rather than routine annual, milestone or site-level audits. Interim assurance should be provided through management declarations and expenditure reporting.
3. **Contracting model:** Use one umbrella grant agreement for each successful applicant, equivalent in function to a master services agreement or head contract. Add each funded site through a site-specific scope of work or project schedule.
4. **Funding for new two-MNO sites:** Make up to 100% of eligible CAPEX and 100% of eligible incremental OPEX over the ten-year Operational Period available for new sites that secure at least two MNOs. Participation by the third national MNO should not be required.
5. **Grant Period:** Increase the maximum project delivery period from 18 months to 36 months. An 18-month target may continue to apply to sites that are already shovel-ready or materially progressed at the time of award.

3. Shovel-Ready Costs

a) Waveconn supports the shovel-ready requirement

Waveconn supports requiring projects to be shovel-ready before grant award. The requirement reduces delivery risk and provides confidence that land, access, approvals and power arrangements are sufficiently advanced for construction to commence promptly after execution of the Grant Agreement.

However, sections 5.3.1 and 5.3.2 of the Draft Guidelines treat shovel-ready costs as a separate expenditure category, cap reimbursement at \$80,000 and exclude costs incurred before release of the Guidelines. These restrictions are not aligned with the cost and timing required to develop complex regional sites.

b) Historic shovel-ready CAPEX should be eligible

Where a project secures National RRAMP funding, the applicant should be entitled to claim 100% of reasonable costs legitimately incurred in achieving shovel-ready status, irrespective of when those costs were incurred. The funding decision provides the appropriate point at which eligibility is confirmed; the date on which the applicant commenced development should not determine whether an otherwise valid project cost is recoverable.

Eligible shovel-ready expenditure should include all directly attributable third-party and internal project costs required to satisfy section 5.1.3, including:

- site identification, feasibility assessment, surveying, geotechnical investigation and design;
- land access, tenure, easement and site acquisition work, including directly attributable legal and registration costs;
- development, building, environmental, heritage and other statutory approvals, studies and fees;
- power and backhaul investigations, applications, designs, connection studies and quotations; and
- other reasonable costs necessary to place the funded site in a position where construction can commence.

Claims should remain subject to evidence, direct attribution to the funded project, reasonable cost allocation, no double funding and value with relevant money. Business-as-usual overheads that cannot be directly attributed to the site should remain ineligible.

c) The \$80,000 cap should be removed

The cost of achieving shovel-ready status varies materially by location, tenure, access, topography, environmental and heritage requirements, utility availability and design complexity. A fixed cap will favour low-cost development sites rather than the sites that deliver the strongest coverage, safety and capacity outcomes.

For higher-cost locations, an \$80,000 cap may make it uneconomic for an applicant to undertake development at risk, even where the site is the best technical solution for an Eligible Strategic Location. This would narrow the project pipeline and may cause the Program to fund a less effective site solely because it is cheaper to prepare.

The cap should be replaced with a case-by-case assessment of actual costs, supported by invoices, competitive market evidence, cost benchmarks and an explanation of why the expenditure was necessary. This approach retains cost discipline without distorting site selection.

d) Suggested drafting

“Eligible shovel-ready costs may be incurred at any time, will be funded at 100% and are not subject to a fixed cap. Claims must be directly attributable, reasonable, evidenced, not double-funded and represent value.”

4. Financial Auditing

a) One consolidated audit at the end of FY2028-29

Section 12.3 permits the Department to require an independently audited financial acquittal report at the grantee's expense. Waveconn recommends that any independent audit, if required, occur once, after the end of the Program funding period on 30 June 2029.

If an audit is required, it should be consolidated across all projects and site schedules held by the grantee under the National RRAMP. It should verify grant receipts, eligible expenditure, co-contributions, underspends and compliance with the approved funding amounts through FY2028-29.

b) Suggested drafting

"Unless the Department reasonably identifies a material compliance concern, the grantee will upon request, provide one independently audited financial acquittal report after 30 June 2029, covering all funded projects and expenditure under the agreement."

5. Contracting Model

a) Umbrella grant agreement with site-specific scopes of work

The Draft Guidelines require a legally binding Grant Agreement but do not specify how multiple rolling site awards will be contracted. Executing a separate full-form agreement for every site would create repetitive negotiation, execution, reporting and contract management work.

Each successful applicant should instead enter into one umbrella grant agreement with the Commonwealth, equivalent in function to a master services agreement or head contract. The umbrella agreement would contain the common legal and administrative terms for the Program.

General terms would be agreed once. New awards and site-level variations could be implemented through short project schedules without reopening the umbrella agreement. This structure is well suited to the rolling process and would reduce legal and administrative cost for both parties while retaining clear site-level accountability.

b) Suggested drafting

“The Commonwealth may enter into a single umbrella grant agreement with a registered applicant. Each approved project may be incorporated into that agreement through a project schedule or scope of work. A project schedule forms part of the umbrella grant agreement when executed by both parties.”

6. Funding for New Two-MNO Sites

a) Two MNOs should be sufficient for up to 100 % funding

Section 3.1 provides 100% funding for new infrastructure only where three new MNOs provide coverage. A new site with two new MNOs is limited to 75% of Total Project Cost in regional Australia or 85% in remote or very remote Australia.

Waveconn recommends that new infrastructure securing at least two MNOs be eligible for up to 100% of eligible CAPEX and 100% of the capitalised net present value of eligible OPEX over the ten-year Operational Period. A commitment from the third national MNO should not be required.

This treatment should apply to active and passive sharing and to MNO-led and MNIP-led projects. For the avoidance of doubt, where Optus and TPG Telecom each deliver a mobile telecommunications service from a site through their existing Multi-Operator Core Network agreement, the site has secured two MNOs and should be eligible for the two-MNO funding treatment.

b) A three-MNO threshold may prevent competitive entry

A third MNO may already provide coverage to the relevant area from existing infrastructure and therefore have no commercial reason to support a new site. In that circumstance, the new project may be capable of introducing the other two MNOs and delivering full consumer choice across all three networks, but it cannot qualify for 100% funding because only two MNOs are new to the Eligible Location.

Linking full funding to three new MNOs gives an operator that already has coverage an effective veto over the funding outcome, even though its participation is not required to deliver additional competition. The two incoming MNOs must then fund a material shortfall at a location with weak commercial returns. This may prevent the site proceeding and preserve the existing single-provider outcome.

Two MNOs already deliver genuine multi-carrier coverage, and consumer choice. Full funding should therefore be available where two MNOs commit for the ten-year Operational Period. A third MNO should remain welcome, but should not be a condition of full funding.

c) Consistency with the RRAMP pilots

The state-based RRAMP pilots demonstrate that full public support for capital works and long-term operations can be made available on a per site basis without requiring all three national MNOs.

The Commonwealth pilot principles prefer participation by at least two MNOs, rather than all three, and require funded infrastructure and services to operate for at least ten years. The Western Australian Pilot makes funding of up to 100% available for eligible activities, expressly including the capitalised net present value of operational costs over the ten-year minimum period, without a three-MNO threshold.

This precedent support a National RRAMP setting under which a genuine two-MNO new site can receive up to 100% CAPEX and 100% ten-year OPEX funding. The National Program should not provide materially weaker support for the same multi-carrier outcome.

7. Grant Period

a) Increase the maximum period to 36 months

Section 3.2 limits the Grant Period to 18 months. That period is reasonable for a site that has already achieved shovel-ready status and is materially progressed through detailed design, procurement planning and MNO integration before grant award.

However, the locations prioritised by governments, road authorities, emergency services and local stakeholders are unlikely to align closely with existing MNO forecast demand or the current development pipeline. The overlap between stakeholder priority locations and sites already developed at risk is therefore expected to be limited.

A uniform 18-month limit may bias the Program toward sites that happen to be in an existing MNO pipeline rather than sites that best meet RRAMP stakeholder priorities. It may also reduce the number of applicants able to offer credible delivery commitments.

Waveconn recommends a maximum Grant Period of 36 months from execution of the relevant project schedule. The site-specific period should reflect project maturity. An 18-month target may apply to sites that are already substantially progressed, while less mature or more complex sites should be given the time reasonably required for delivery. The Program end date and payment arrangements should be adjusted accordingly.

b) Suggested drafting

"The maximum Grant Period for a funded project is 36 months from execution of the relevant project schedule. The project schedule will specify a shorter completion period where appropriate, having regard to the project's maturity, complexity, utility and backhaul dependencies and MNO integration requirements."

8. Conclusion

Waveconn supports the proposed National RRAMP framework and the use of a rolling process for shovel-ready projects. The amendments proposed in this submission are targeted delivery improvements and do not require a fundamental change to the Program.

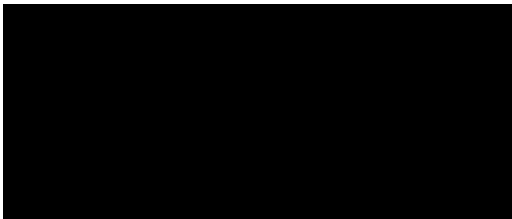
Waveconn recommends that the final Guidelines:

1. **Remove the timing restriction and \$80,000 cap on shovel-ready costs**, and fund 100 % of all reasonable and directly attributable historic and future costs for projects that secure funding;
2. **Require one consolidated independent financial audit after FY2028-29**, with proportionate interim reporting and targeted audit rights where a material issue arises;
3. **Use one umbrella grant agreement per successful applicant**, with each rolling site award added through a project schedule or scope of work;
4. **Make new sites securing at least two MNOs eligible for up to 100 % CAPEX and 100 % of ten-year OPEX**, without requiring the third national MNO; and
5. **Increase the maximum Grant Period to 36 months**, while retaining an 18-month delivery target for projects that are already materially progressed.

These changes will reduce unnecessary cost and administration, improve the pool of viable priority sites and strengthen the prospect that the Program delivers durable multi-carrier competition and network diversity on regional roads.

Waveconn stands ready to support the National RRAMP through its neutral host infrastructure model and its experience working with Australia's national MNOs.

Sincerely



Grant Stevenson

CEO

Waveconn