

17th January 2023

Director, Regional Connectivity
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

RE: Draft guidelines for the Regional Connectivity Round 3 and future Mobile Black Spot Programs

Field Solutions Group (FSG) welcomes the opportunity to provide feedback on the draft guidelines for the Regional Connectivity Project Round 3 and future rounds of the Mobile Blackspot Program.

The Department is to be commended for continuing its drive to review and enhance guidelines, including proposed changes to mobile network coverage thresholds and the baseline maps used to assess new coverage. This most certainly it is the right thing to do and will result in better outcomes for program awards.

FSG has spent some time reviewing previous awards under MBSP and RCP and the proposed changes to guidelines and has provided some feedback on proposed changes and areas where there are opportunities to further assist the programs outcomes.

Item	FSG Comment
General Comments about "Backhaul upgrades" & "Capacity Upgrades"	<p>Under the current guidelines, applicants can propose backhaul upgrades and capacity upgrades. This has been part of previous rounds where there has been not insignificant funding grants awarded.</p> <p>FSG believes that there needs to be tighter guidance around the applicants' submissions, including taking into account, applicants own profitability and ability to "afford" upgrades - especially if the upgrades are for previously co-funded telecommunications networks.</p> <p>Radio access and backhaul capacity planning, are a bread-and-butter activity for operators looking to maximise customer experience and "protect" their "network superiority" statements. It seems odd then to have scarce government funding, representing 0.03% of an applicant's profit, being outside an organisations operating budget capability.</p> <p>Whilst granted this is one not easy to implement, it is worthy of review.</p>
Technology Upgrades	<p>Previous rounds of the RCP have awarded funds to carriers to upgrade networks from 3G to 4G. This is despite the fact that public records show that carriers that have announced the shutdown of their 3G networks, and that all areas receiving 3G coverage will all be upgraded to 4G. Any loophole that allows this, including if "disguised" under a "5G" upgrade, isn't in the spirit (Or warrants made on future plans being ineligible by applicants) of the programs.</p>

Operational Period	FSG believes the RCP and MBSP should be aligned at 10 years, with provisions for technology evolutions that would enhance end user experience.
Factoring forecast traffic growth	<p>There is no doubt that traffic demand has increased year on year, and this is only set to continue. FSG suggests more needs to be done to ensure funded solutions are indeed scalable and designed with minimal upgrade costs required to expand capacity into the future.</p> <p>There are many ways this can be achieved, and FSG is more than happy to sit down and talk in more detail.</p>
Forward Planning Exclusions	FSG recommends that a company executive warrants that any application do not contain builds that are, or have been within last 12 months, (Or stipulate a date) part of forward 3-year plans, including if these were only “feasibility” plans.
Coverage Assessment (For Mobile be it RCP and MBSP)	Coverage metrics used for new, overlapping and base line must align to the proposals set out originally in the draft Improving Mobile Coverage Round.
Variations	<p>Whilst MBSP has suitable variation processes to follow, the RCP lack of similar process needs to be rectified. Whilst FSG is sure that most applicants undertake a certain level of due diligence before submissions, there is rarely enough time to go into enough detail to limit potential variation requirements. Indeed, the only way this would be avoided, would normal have meant a field survey was completed prior to application, which is highly unlikely to have been done unless it was part of a forward plan.</p> <p>FSG believes the variation/frustration processes within MBSP mostly work and that these can easily be introduced to the RCP.</p>
Encouraging Co-Build and Active Models	<p>Much has been said on co-location under MBSP being a “failure” which isn’t fair to the program or its participants. Consideration needs to be given to high number of small cell deployed (not suitable for co-location), funding of brownfield deployments (Carriers co-locating on NBN Co assets or other existing assets/tower Cos) and then the location and symmetries to another carriers existing or forward build network.</p> <p>For those monopoles and lattice towers built under previous programs, but not yet supporting another MNO, the opportunity for the most part still exists for others to co-locate, all be it more costly than if a co-build.</p> <p>When funding is awarded for the construction of new infrastructure (and lets say carrier grade), whilst MBSP it was a requirement to provide opportunities to “co build”, this wasn’t the case for RCP. Further, under both programs, should no other carrier/NBN Co wish to co-locate, there was no requirement to ensure the infrastructure was built with “reserve” structural capacity to make co-location more cost effective in future for at least one more MNO. This is certainly something that should be re-assessed.</p>

	<p>Given all three MNOs have divested most of their tower assets (some with controlling ownership), whose business models are to increase tenancy, I'm sure there would be wider support to "build this in" upfront.</p> <p>Scrutiny needs to be placed on who the actual "applicant" is given the relationship/ownership of the TowerCos by the MNOs. If the intention is that at some stage an MNO awarded submission, within the operational period, novates/transfers/sells the infrastructure asset to their/a TowerCo, should this have been made clear during the submission? And how can future co-locators ensure that the subsidisation that was provided for the Infrs is reflected in licence fees charged by the TowerCos?</p> <p>Bog standard co-location aside, it's clear that all three MNOs are actually open to using other solutions such as Active Neutral Host RAN and domestic roaming. This has certainly been made quite public during recent applications to the ACCC. Furthermore, carriers have been sharing antennas passively for years with In building distributed antenna systems, and in some cases, in joint venture relationships within external macro environments.</p> <p>Whilst there has been commentary about technical limitations of such solutions, likely less relevant given the locations of blackspot sites. For example, one MNO may use a particular network vendor and believes alternate vendors may have not have "parity" on technical specs. Whilst this may be factual, it's also a fairly lame excuse considering customers are most likely to be blissfully unaware of the electronics supplying them with their connectivity. (It's a bit like the 3G/4G/5G thing – most people don't care about what kind of "G" they get, they just want it to work!)</p> <p>Similarly, anti-roaming commentary doesn't really tell the full story. Arguments about calls dropping when moving between home and roaming network– well, wasn't the call going to drop anyways because of the home networks radio conditions? And there are technical solutions to minimise handover drops.</p> <p>Re-introducing the scoring for multi operator capable, committed submissions is encouraging. However, higher points need to be awarded for <i>truly</i> neutral solutions. Let's say an application is received that states two MNOs are going to be part of a solution that uses Active Neutral Host Technologies. If that solution is "exclusive" to the two applicants, then it shouldn't be awarded in the same way where an applicant has nonexclusive models – let's say a "Fair dinkum" active neutral host solution such as that being deployed by FSG.</p> <p>No one likes a mandate, much like many don't like exclusivity and as such, scoring should reflect that. No doubt this topic will be quite the debate!</p>
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Reporting Requirements	The reporting requirements of previous RCP could be better aligned to that of MBSP, ensuring more time is spent focussing on build and outcomes than red tape. A solid cadence in meetings and simplified reporting is the most effective way to run a project
Application Documentation	<p>Any mention of the term “PSAT/BSAT” can turn the happiest of campers into a grumbly mess. Multiple Tabs that have no automatic cross referencing, inability to free windows/lines/columns, inability to insert or easily delete lines; the list can go on.</p> <p>Whilst it is appreciated that the information is critical for assessment and comparisons, in 2023, there must surely be a better format than excel that can be used! Even a more simplified, flat excel that has ability to be uploaded into a database as part of an online application would seem so much easier (the team at FSG are very keen to assist!).</p>
Release of Programs	<p>I’m sure all previous applicants to an RCP or MBSP would have liked some forward notice ahead of official program release to assist with managing resources and ensure they put their best foot forward on applications. And by that, even an indicative actual date.</p> <p>Whilst FSG appreciates that this can be a challenge, it will make a difference to applications received, especially when managing external parties’ timelines as part of a submission (ie Councils and Community Groups)</p>
First Nation Specific Locations	<p>A significant number of First nations communities lack even the most basic form of competition in that the network provider does not offer its MVNO customers access, or if it does, only inferior 3G coverage.</p> <p>Greater considerations should be given when establishing competitive and holistic connectivity solutions, especially to remaining Homelands communities. Greater flexibility to vary solution in line with community engagement is key, access to equipment, pricing plans, access, filtering, recharge facilities just to name a few. FSG would welcome opportunity to discuss in greater depth at a meeting.</p>

FSG welcomes the opportunity to discuss our feedback directly should the department desire or as part of an industry forum.

