

## **UNIVERSAL OUTDOOR MOBILE OBLIGATION (UOMO) DRAFT LEGISLATION**

Submission lodged by B Bebbington.

### **Primary Universal Outdoor Mobile Providers**

The legislation should not only apply to the three mobile providers (Telstra, Optus and TPG) for the services they supply directly to their retail customers.

As we do not have mobile coverage and work from a farm, we have prepaid mobile, as it is rarely used. Consequently, we have Woolworths Everyday Prepaid mobile, which operates on the Telstra wholesale network.

The ability of consumers to use, in this instance, predominately the Telstra network, at reduced costs, provides choice and affordability for customers.

The UOMO legislation should incorporate all resellers of the three majors, so that the benefits of increased mobile coverage would apply to more people.

This is particularly the case if the UOMO replaces any expansion of the mobile network either voluntarily or through programs such as any future mobile blackspot program or regional connectivity programs, as the customers of resellers are likely to benefit from new terrestrial mobile coverage, but may not benefit from the UOMO as it is proposed.

### **MINISTER ALREADY HAS POWERS TO INCREASE MOBILE COVERAGE TO RESELLER CLIENTS**

Recently while travelling north of Perth (Moora to Three Springs and Perenjori), in some cases only over 100km from Perth's northern suburbs, we found we had no mobile coverage, as the Telstra wholesale network surprisingly does not cover areas that close to Perth.

As referred to in the discussion paper, the Minister has certain powers already, and a requirement that resellers shall provide the same coverage area as the mobile provider, rather than a reduced area, would have immediate benefit in both emergency situations (000), during events such as bushfire and flood and in general coverage.

### **CLEAR RULES ON COVERAGE MAPS NEEDS IS CRITICAL TO THE UOMO SO THAT CONSUMERS CAN BE GUARANTEED THAT THERE IS COVERAGE**

Telstra modified its coverage maps after the Productivity Commission inquiry into the USO, where evidence showed that the coverage maps were inaccurate. The evidence Telstra gave, under questioning, at the Sydney hearing, described the limitations of coverage and Telstra conceded that the theoretical coverage was not inside a house, but at the road in front.

Telstra revised their coverage maps significantly, and in our case, where we still do not have mobile coverage, the maps went from showing full coverage to now, there is, correctly no coverage.

The accurate coverage maps had ramifications for Telstra's csg and priority assistance requirements, where it deemed refusal of an interim service because their maps showed coverage existed and the customer, particularly priority assistance customers, were left without any services because Telstra deems, they had offered a working service.

Likewise, the coverage maps of where UOMO coverage is expected needs to be accurate, so that consumers do not purchase phones capable of d2d that are useless because there is no coverage in their area and so that consumers do not travel to areas, where, as the discussion paper says "...the UOMO has significant public safety benefits enabling people outside of terrestrial mobile coverage to SMS or call for help if lost or injured."

#### **FICKLE NATURE OF SATELLITE CLEARLY DEMONSTRATED IN THE DISCUSSION PAPER**

"However, D2D technology requires an unobstructed line of sight to the sky to enable mobile handsets to connect to a satellite.

Given this, the Bill specifies that outdoors excludes several scenarios. The obligation will not apply inside a building, vehicle, aircraft or vessel, or underground or underwater. This means, for example, that the UOMO does not require an MNO to provide outdoor coverage when a consumer is driving down a road (although in time, this may be possible)."

This statement is welcome, as it demonstrates the limitations of the satellite to mobile technology and how little an obstruction can be that will prevent the service from operating.

The paper refers to heavily wooded areas, however, the technology, if it is not expected to work in a vehicle, tractor cab, under a tin roof, inside the cabin of a boat, then it will

not take much vegetation to block the signal. A single tree would be as effective a block as the roof of a car.

### **NEARLY ALL OF AUSTRALIA WILL NOT BENEFIT**

“First, in relation to the geographic area in which the UOMO will apply. As set out below, this is nearly all of Australia.”

The inability of the satellite to d2d to work in heavily forested areas, impacts large areas of Australia.

The areas where mobile coverage is limited due to terrain are also the areas that are likely to be heavily forested. These are also often the high visitation areas for recreational users.

For example, the Blue Mountains, Great Dividing Range, Alp’s regions, Southwestern WA, the escarpment in WA, large areas of Tasmania, the Daintree. These all have issues with no or limited mobile coverage, often are National Parks or state forests and therefore forested and yet they will not, in the main benefit from the UOMO via satellite.

Large areas of the country will benefit, where there is no significant vegetation cover, but the statement that nearly all of Australia will benefit is not accurate.

### **TEXT TO 000**

There has been discussion about text to 000 services.

The transmitter from a mobile tower or the satellite provides a stronger signal than from the mobile device, which is evidenced when -

- a) the phone rings, but you cannot pick up the call,
- b) you cannot make a call, in response to the phone ringing
- c) you receive notification of a text, but cannot open the text
- d) you cannot send a text but can receive notifications from the tower.
- e) Texts may come through and be replied but voice capability does not exist.

Therefore, if text to 000 was available, consideration needs to be given to whether the 000 service would reply via text or by voice.

In the first instance, the protocol should be for the 000 operator to call the number, to see if a voice call can connect via the transmitter, where a voice call cannot be made from the phone.

If a voice call cannot be received and communication established, then reply by text shall occur.

In an emergency, simply hearing a voice at the other end, cannot be underestimated in reducing the stress and anxiety of a situation.

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