

Mobile Coverage Programme Discussion Paper

Submission Cover Sheet

Submission Information

This cover sheet should be attached to submissions made to the Department of Communications in relation to the Mobile Coverage Programme Discussion Paper.

Contact Details

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Website (if applicable):

Date: 28.02.2014

Confidentiality and privacy

All submissions and comments, or parts thereof, will be treated as non-confidential information unless specifically requested, and acceptable reasons should accompany each request. Email disclaimers will not be considered sufficient confidentiality requests.

Respondents lodging a submission should be aware that submissions (excluding any information agreed to be treated as confidential information) will be made publicly available, including on the Department of Communications' website. Submissions and comments will be subject to freedom of information provisions. Despite a submission being identified as confidential or sensitive, submissions may be disclosed where authorised or required by law, or for the purpose of parliamentary processes.

Do you want all or parts of the submission to be treated as confidential? **Yes** **No**

If yes, identify below which parts of the submission are to be treated as confidential (and provide a reason):

If the submission contains personal information of any third party individual, indicate on this Submission Cover Sheet if that third party individual has not consented to the publication of his or her personal information:

Submission Instructions

Submissions are to be made by **5:00pm (AEST) Friday 28 February 2014**.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text-based formats via the email address mobilecoverage@communications.gov.au

Alternatively, submissions can be sent to the postal address below (to arrive by the due date):

The Manager
Mobile Coverage Programme
Department of Communications
GPO Box 2154
CANBERRA ACT 2615

All submissions lodged will be acknowledged by the Department of Communications by email (or by letter if no email is provided). Respondents lodging a submission who do not receive acknowledgement of their submission should contact the Department. Submissions which are not acknowledged by the Department as being received may not be considered. Respondents should be aware that emails greater than 10Mb may not be successfully delivered.

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The community of Allambee South and Thorpdale welcome the opportunity to make this contribution to the discussion of improvement of mobile coverage. The submission has been based on inputs from over 30 people (summary in Appendix).

Context of this community's response

We are a small regional community nestled in the Strzelecki Ranges of Gippsland, not particularly distant from Melbourne or major centres but extremely isolated in terms of telecommunications. The Allambee South/Thorpdale area is well populated by a wide variety of businesses and families, and is characterised by large farms mixed with small holdings. As well as most landholders in the area undertaking business activities such as farming of food crops and animals there are many who work at other enterprises and jobs from their homes. For many of us the capacity to work, learn and interact with our community and the wider world is frustratingly constrained by shockingly poor and expensive communications facilities and options.

The telephone copper wires infrastructure is very old and degraded, such that even without the additional constraint of distance it is incapable of supporting ADSL broadband to most customers. Telephone drop outs are frequent. Most adult residents in the community have mobile phones for business or personal use. Unfortunately, they operate fully only in the major centres (but only Telstra in Thorpdale).

When it is available broadband in the area is expensive and of low quality. For many there is none at all, particularly for those unable to obtain registration of the NBN interim satellite. With governments both state and federal clearly ignoring rural communities' need for affordable, reliable Internet provision, and no prospect of improvements to our local broadband Internet options or service, mobile coverage is an expensive but viable alternative.

Mobile coverage in this community is patchy and poor. As shown in Figure 1, there are substantial areas with no coverage at all in Telstra's service, more than shown here when viewed closer.

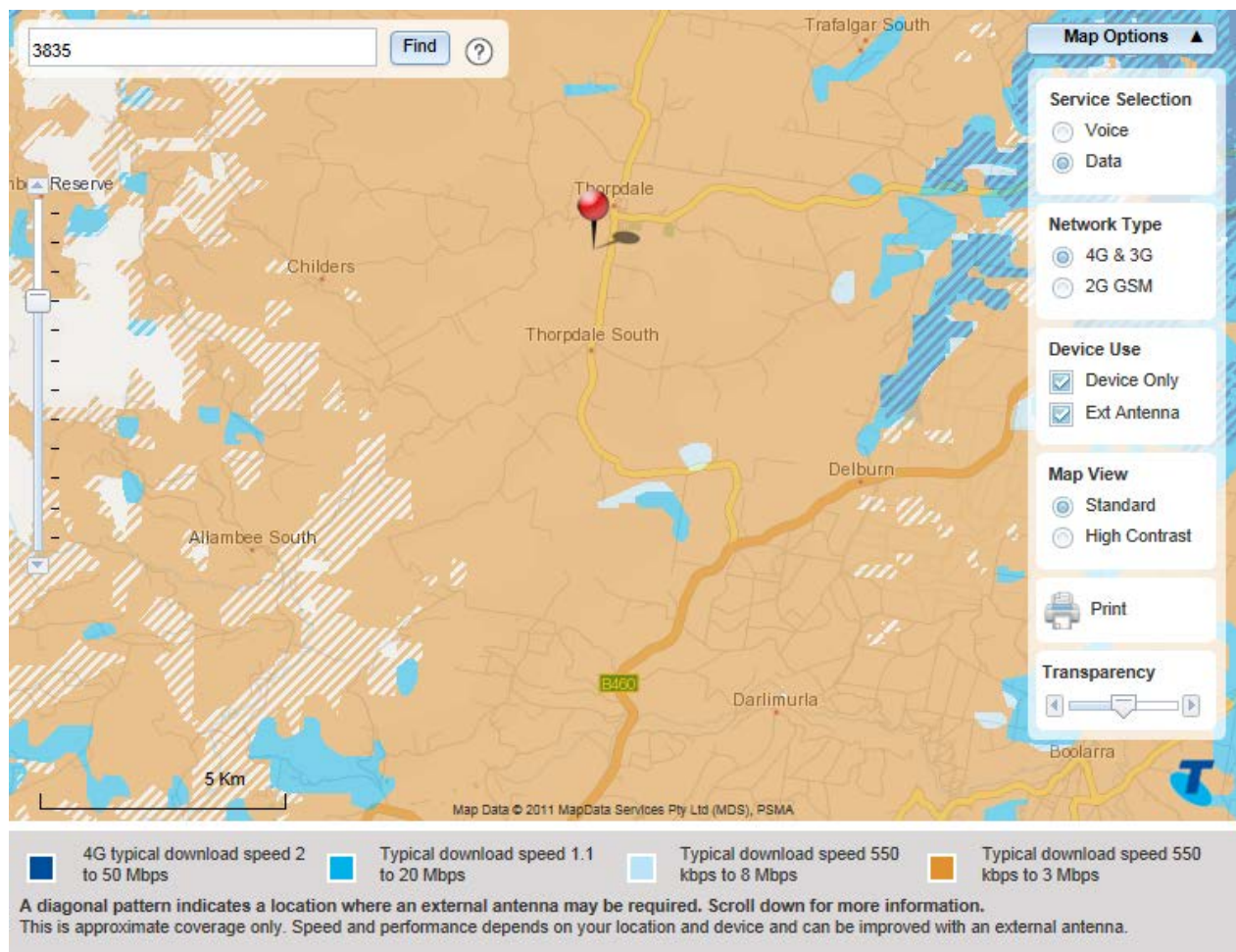


Figure 1: Telstra Mobile Coverage as at 21 February 2014

Despite the “rosy” representation of Optus coverage as shown in Figure 2, the 3G quality in most of this area is for emergency calls only.

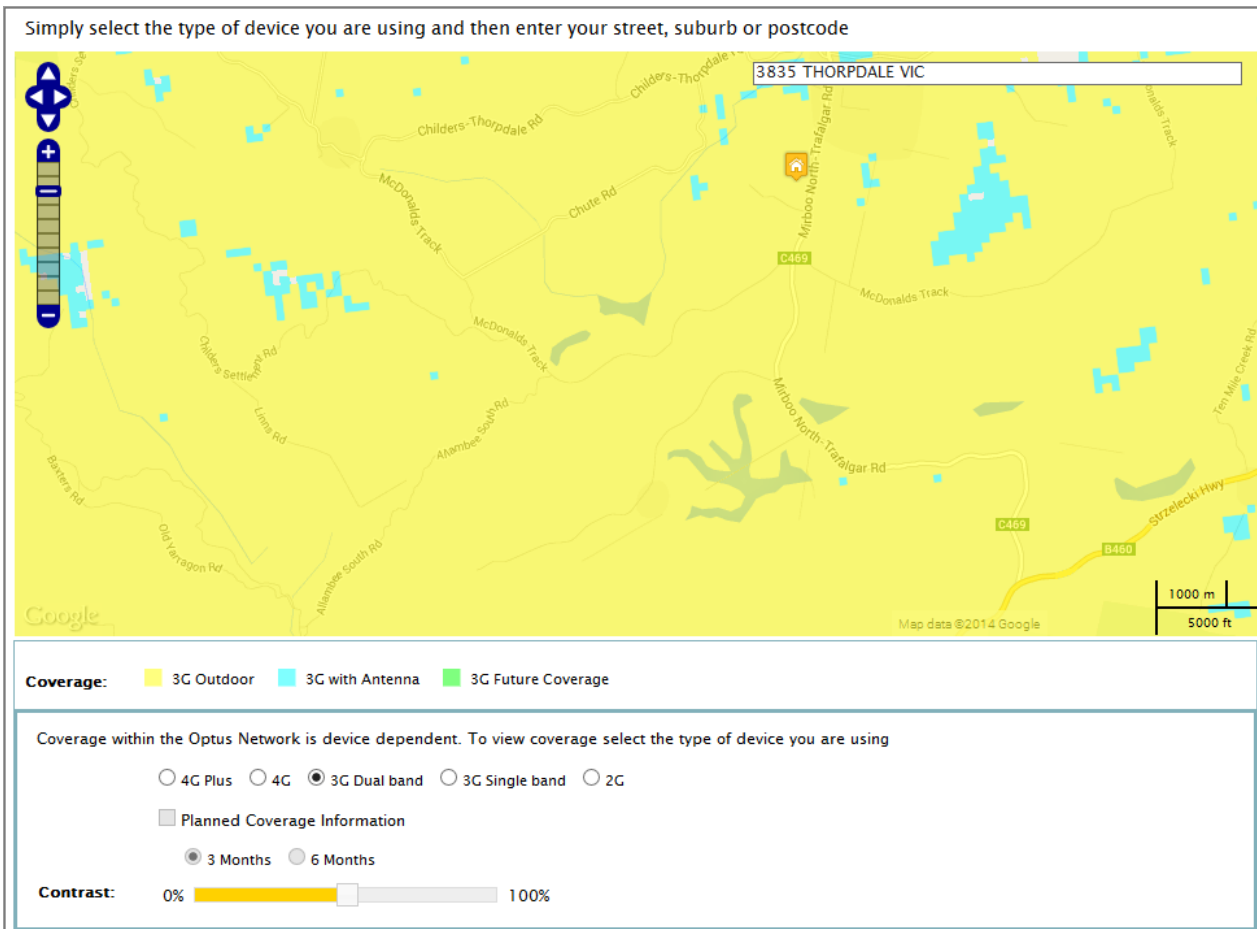


Figure 2: Optus Mobile coverage as at 21 February 2014

Large areas within our communities have no means of receiving emergency warnings other than by television and radio. Ageing power infrastructure leads to frequent blackouts, particularly in extreme weather, meaning that even these sources of information are often unavailable. Battery powered mobile telephones and suitably protected local mobile infrastructure would do much to address this serious deficit.

Given the state of telecommunications in the area this community is anxious to ensure that implemented improvements arising from this programme actually address the needs of communities like ours.

Response to \$80 million Mobile Network Expansion and \$20 million Mobile Black Spots Project

In the Mobile Coverage Programme this community would urge that three principles be observed whichever model is decided:

1. *The location of the services be determined by equity of access and community need not driven purely by business imperatives*

Having MNOs too strongly influence the location of the base stations will limit the capacity of the programme to service identified black spots and currently underserved communities. The need for sustainable operation of infrastructure is acknowledged, however sustainability should be measured against more than monetary criteria.

The risk of both Options 2 and 3 is that communities may be overlooked in the process of “cherry picking” the locations specified by the Commonwealth. In communities such as ours, located in

hilly terrain, positioning base stations to achieve maximum line-of-sight may be expensive initially and, in all likelihood, an unpopular choice. However the potential to grow business once access is available is real.

The **use of the NBN fixed wireless network** should be considered in this context. If the NBN is to become the national backbone for digital communications it appears to have the potential to save time and money for programmes such as this. While we are not in a position to comment on the *extent* to which the use of the NBN fixed wireless network may impact on improvements, neglecting consideration of its integration in this process would be remiss given the national investment made in it to date.

In the Background of the Discussion Paper Introduction the inadequacy of coverage for regional Australians is provided as the rationale for the objective of the programme. This appears to be counter to assessment criterion 3a, "Extent of coverage benefit", "the number of premises located within the new mobile coverage footprint". This community would ask that this criterion be reconsidered to ensure that the services are able to assist communities that may be smaller but have substantial telecommunications deficits.

2. *Equip for today and the future*

In determining technologies to be implemented the most modern available options need to be provided as well as current standard services. The design and construction of the base stations should be able to support future enhancement/upgrading/extension (for example in future with minimal cost.

Consideration should also be given to ensuring that the base stations and associated infrastructure is able to withstand environmental extremes. By doing so, interruptions to coverage during extreme events including fire, flood and storm be minimised and its role in community safety maximised.

As outlined above, mobile coverage for communities such as ours will be critical not just for carrying voice and text, but for Internet. Drop out of signal, and poor quality of service is a common problem for those community members here who do have access, making Internet access unreliable, slow and very costly. Technology decisions based not only on breadth of coverage but quality standards that make the service fit for purpose will be essential for success. As such this community would ask that a minimum received service signal indication (RSSI) for voice and data as per the example on page 5 of the Discussion Paper, be specified as a requirement for 100% of any proposed coverage area, and that this or a similar quantitative benchmark be added to the Proposed Assessment Criteria .

3. *Competition of retail services be encouraged*

Rural communities are subject to monopoly pricing for many services. Costs of telephone and Internet are substantially higher than for metropolitan areas, and the range of packages and products more limited.

Enabling retail competition by MNOs may not only benefit communities in terms of range of services and pricing but may also grow the business for the retailers as people learn what is possible with the technologies. Options that enable and encourage access by multiple MNOs are preferred.

Thank you for the opportunity to respond.

On behalf of the Allambee South/Thorpdale community.

Ms F Kim Styles, Mrs Diane Beyer

26th February 2014.