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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Date:	28 February 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 X** ☐

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.

AUSTRALIAN LOCAL GOVERNMENT ASSOCIATION

ALGA Submission to the Mobile Coverage Programme Discussion paper
Via email to: mobilecoverage@communications.gov.au
28 February 2014

The Australian Local Government Association (ALGA) welcomes the opportunity to make comments on the Department of Communications' Mobile Coverage Programme Discussion Paper which was released on 16 December 2013.

ALGA is the voice of local government in Australia, representing around 560 councils across the nation. In structure, ALGA is a federation of state and territory local government associations. This submission has been prepared in consultation with ALGA 's members, and should be read in conjunction with any separate submissions received from state and territory associations as well as individual councils.

ALGA welcomes theCoalition's election commitment to improve mobile phone services throughout remote, regional and outer-metropolitan Australia through the allocation of $100 million to the expansion of the current mobile network and the removal of black spots. It also welcomes the Coalition's pledge to maximise the utility of National Broadband Network infrastructure by encouraging co-location of mobile phone base stations.

Under the Government's $100M Mobile Coverage Programme, $80M is allocated to expansion of the mobile network to improve mobile coverage along major transport routes, in small communities and areas prone to natural disasters. $20M is to improve mobile (black spot) coverage in locations with unique coverage problems, such as areas of high demand for services during seasonal holiday periods. It is this latter component which is more relevant to local government.

Mobile Network Expansion Project

The discussion paper outlines three possible delivery models and key elements of the programme, designed to improve mobile phone services throughout remote, regional and outer-metropolitan Australia to deliver the $80 Mobile Network Expansion Project:
- a single mobile network operator (Optus, Telstra, Vodafone) to deliver the programme
- to call for bids from multiple network operators (this would increase competition, but there would be more administration and compliance involved and a hierarchy /order of merit of base stations created and the extent of improved coverageestablished)
- call for bids from parties wishing to build, own and operate a network of base stations - including base stations and backhaul and developing a mobile network capability which MNOs could roam locally (the provider would share with all MNOs via a wholesale service) The infrastructure provider would need to guarantee that they had secured in-principle agreement from at least one MNO re locations and use of the base stations on a commercial basis for a minimum of 10 years.

ALGA does not offer a position on which of the 3 models is preferable, but stresses that the right balance is required, to enable those communities which are more commercially viable to assist in cross subsidising those which are not commercially viable. The challenge is how to deliver services under the Mobile Coverage Program, within the limited funding available, to those regional communities where it would otherwise be non- commercial and uneconomic for carriers to do so. The Mobile Coverage Programme's assessment criteria , if weighted on value for money, outputs and extent of coverage benefit, may bypass many of these non-commercial communities. Carriers will invest in areas with the largest number of subscribers. The Local Government Association of Queensland (LGAQ) has suggested that the best outcome may be by aggregating the sites on a state or regional basis. This could allow the commercially more attractive sites or those that are more likely to be viable, to cross-subsidise those smaller and greatly unviable sites.

- Extending mobile coverage

ALGA welcomes the Government's commitment to improve mobile coverage in regional and remote areas through the Mobile Expansion Program. ALGA's position over many years has been that people in rural and remote areas should have access to the same level of telecommunications services as their urban counterparts. In providing greater mobile coverage, it remains important that fibre backhaul is provided in towns, which would facilitate the capacity for mobile services to be provided equitably to all Australians, particularly in rural and remote areas. For remote areas which are currently without coverage, high entry costs have made it unviable for carriers to invest. ALGA believes that it is critical that the order of merit/list of proposed base stations is determined in consultation with local government, to ensure that those areas in most need benefit from the $80M allocated to the Programme.

Extending the mobile communications network has not been without problems. New telecommunications towers and some extensions to existing towers have caused and continue to cause controversy in some communities. The location and number of mobile base stations, as well as the issue of health risks and their proximity to schools and day care centres, has caused a great deal of community concern. For many years local government has argued that telecommunications infrastructure should be subject to planning and development regulations, to ensure that the deployment of mobile base stations occurs in a way that is sensitive to the needs of the community, minimises visual impact and takes into account health and environmental considerations.

However, councils are also aware of the balance needed between the growing demand for phone coverage and data capacity and the community's wish to be properly consulted on the siting of the infrastructure.

In order to maximise the available technology, there is also a need for users of mobile services and technology to have the skills and understanding to use it effectively. For example, in relation to mobile blackspots, providing advice to people travelling in rural and remote regions which will enable them to maximise mobile phone coverage. (This could include selecting the right handset, or the use of external aerials, to improve reception. Not only could this deliver safety benefits to motorists, but it could also improve the signal strength and increase the service footprint.)

- Consultation

In view of these considerations and past controversy, ALGA would reiterate the need for carriers to undertake longer term-forward planning, and for adequate and timely consultation with local government on the siting of the infrastructure. This assists in ensuring a balance between the needs of carriers and the rights of owners and residents in the local community. Consultation and

notification is good business practice and leads to better outcomes in the community. The revised *Mobile Base Station Deployment* Industry Code C564:2011, which came into effect in July 2012, has strengthened the requirements imposed on carriers to consult with communities and has extended the timeframe for councils and communities to review consultation plans.

-Co-location

ALGA has also repeatedly argued for the co-location of mobile base stations where possible, and is very supportive of the proposed open access and co-location provisions in greenfields sites, namely that they be designed and built to be capable of supporting at least two further mobile network operators.

-Equitable pricing across Australia

ALGA has also previously argued that telecommunications services should be provided equitably across Australia and that rural Australians should not be disadvantaged. ALGA recommends that the Department of Communications incorporate into the Programme provisions for equitable pricing for services in remote areas, so that residents in businesses in rural and regional areas can have access to the same pricing plans as their metropolitan counterparts.

- Community resilience to disasters

Mobile phone blackspots adversely affect community resilience and increase the vulnerability of communities when the need for mobile communications is heightened. The 2011-12 Regional Telecommunications Review found that the adequacy of mobile voice and broadband services was the predominant concern raised with the Committee, and the issue was raised in every regional consultation.

All Australian governments have adopted a resilience based approach to emergency management and are actively engaged in implementing the National Strategy for Disaster Resilience. The Strategy recognises that Australia is a vast and diverse continent and that a "national, coordinated and cooperative effort is required to enhance Australia's capacity to withstand and recover from emergencies and disasters". It also recognises that "disaster resilience is a collective responsibility of all sectors of society".

It is accepted that the Australian population is increasingly reliant on mobile services as a convenient utility for safety and emergency purposes. However, mobile phone "blackspots" exist in regional and remote areas of Australia meaning mobile telephones services cannot be relied upon or do not exist in some areas. Given Australia's vast land mass and sparsely settled populations in some remote areas, blanket coverage of the land mass is unlikely to be achievable in the foreseeable future. While recognising that there will never be 100% coverage, improving mobile coverage will increase the safety of all Australians.

The use of *Emergency Alert* has enabled emergency service organisations (ESOs) to communicate with the public quickly through text messaging. However, "black spots" impact on the effectiveness of *Emergency Alert*. Nevertheless, it is also acknowledged that *Emergency Alert* is only one mode of communication that ESOs use to disseminate warning messages.

The roll out of the NBN Co infrastructure offers some opportunities for mobile carriers to increase their mobile footprint, however, it will be some time before the extent of these

opportunities are fully known and realised, and some communities will need to rely on other forms of communication, such as satellite phones, in preparation for and during emergencies. ALGA encourages all Governments to explore avenues to identify priority communities with high vulnerability to natural disasters, and seek to collaborate with NBN Co and carriers to improve coverage to those communities, particularlyin regional and remote communities.

Mobile Black Spots Project

The $20M Mobile Black Spots Project will occur after the $80M Mobile Network Expansion component has been announcedand a number of locations put forward by local communities may be funded under this component, but with no guarantee that funding will be available for all proposed locations. Once the $80M Mobile Network Expansion component is finalised and publicly announced, expressions of interest will be sought from local communities for locations where the local community is seeking improved coverage for locations not already funded under the $80M component.

All expressions of interest submitted for projects under the $20M will need to provide a co-contribution (cash, or in kind such as site access or road and power installation). Bids will subsequently be sought from mobile network operators (MNOs) for the list of nominated locations. The Commonwealth would provide some of the costs of these community locations , with co-funding from **local government**, state or territory governments, commercial entities, MNOs, infrastructure providers.

ALGA fully supports the provision of $20M to improve access to mobile services in regional and remote areas.   However, rural and remote councils are generally the least capable financially, of providing co-contributions for projects. Although remote councils will be extremely keen to secure mobile coverage where they have no coverage or limited coverage, as they recognise the social and economic benefits this will bring, they may be disadvantaged by the requirement for a co-contribution.   These communities are currently without mobile service because of the prohibitive cost of deploying the service, and are financially struggling themselves.

In the Northern Territory, in addition to the financial constraints experienced by NT rural councils, many councils do not have tenure over land and would not be in a position to offer land as a co-contribution.

ALGA is aware that State and Territory Local Government Associations are in consultation with their councils to identify potential sites for submission to the Department of Communications and discuss the ability of councils to offer co-payment options. However, until designs and costings have been undertaken, which is usually fee-for-service work charged by carriers, it is difficult to know what the actual contribution could be from a Council. The principle of councils assisting to bring mobile phone infrastructure in to their region, either through cash or in-kind, has been successful in the past.

The Department of Communications has been liaising with ALGA on how best to liaise and consult with local government. ALGA has facilitated contact between the Department and State and Local Government Territory Associations and encourages the Department of Communications to undertake comprehensive consultations on the list of priority black spot locations across rural and remote Australia and councils' ability to co-contribute to a new base station.

In addition, ALGA has promoted the Mobile Coverage Program Discussion Paper in its e-newsletter and provided a detailed briefing to councils.

Utilising the NBN fixed wireless network

The Discussion Paper highlights the opportunity to use the rollout of the NBN fixed wireless network to improve mobile phone coverage and competition in Australia. These opportunities include co-locating mobile equipment on NBN facilities and NBN Co offering additional services such as backhaul to mobile base stations.

Although NBN Co has not been tasked explicitly to assist in improving mobile coverage and competition, NBN Co has already entered into some agreements with mobile network operators to share base station infrastructure - to allow shared and "built to suit" options. The Discussion Paper suggests that NBN may be able to play a more active role in aligning common opportunities.

ALGA would support further examination of potential options - early consultation with communities and councils to determine precise locations of wireless base stations given the significant lead times, design of NBN Co fixed wireless base stations which support co-location on a commercial basis, and the ability of NBN Co to sell backhaul capacity to mobile network operators. ALGA would suggest that the priority should remain on providing services to areas of most need, and this not be diluted by seeking commercial advantage for carriers.

The Local Government Association of Queensland points out that NBN is using a fixed wireless frequency in the 2.3GHz range, however, the higher the frequency range the smaller the geographic footprint. Conversely the lower the frequency, the larger the footprint,which has a profound impact on mobile phone coverage in the bush. For these reasons, it is expected that the NBN Co wireless sites would tend to be close to population centres. Ultimately, carriers are best placed to determine if the NBN Co sites will assist in the delivery of mobile phone services.

Duration of the Mobile Coverage Programme

The LGAQ has suggested that a four-year rollout program is too long and that a shorter roll-out program would provide greater mass and make it more attractive for a carrier to participate in the program. A two-year or possibly three year program would deliver greater benefits by making it more attractive for carriers to participate.

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