

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

Name of respondent:	██████████
Name of organisation:	Ballarat ICT limited
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Date:	

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.

RE : Mobile Coverage Programme Discussion Paper

Ballarat ICT Limited supports the Government's funding commitment of \$100 million to improve mobile voice and data coverage in regional Australia given the significant effect it will have on the economy's growth and the future wellbeing of all of regional Australia.

Strategically located in the Central Highlands region of Victoria, Ballarat is approximately 110km north-west of Melbourne, the State capital. Ballarat is one of Australia's fastest growing inland cities with a projected population of 128,190 by 2026. Ballarat is also the gateway to western Victoria and provides many services, connections and economic drivers to support a region of approximately 400,000 people.

Ballarat has traditionally been a city that prospered on mineral and agricultural based resources, however this has changed. Health and community services, education, information communications technology (ICT), manufacturing, tourism and retailing are now the key industries in the city. These industries, along with the banking and finance sector and government services are strengthening Ballarat's role as a regional service hub.

Ballarat continues to positively contribute to Victoria's strong growth in the ICT industry. The information technology sector is emerging as a significant industry within the region. Strategic partnerships with the locally growing ICT sector and tertiary institutions are adding to Ballarat's increasing importance as a knowledge centre within Victoria.

The ICT industry in Ballarat boasts employees from Telstra, iiNet, IBM, and a variety of State Government agencies who have regional operations focused on delivering services across the state and internationally from Ballarat. Ballarat also enjoys competitive infrastructure, delivering broadband speeds up to 100mbps as well as Ballarat being one of the early sites for NBN fibre and fixed wireless deployment; Having this level of infrastructure available places Ballarat in a unique position to provide commentary on the added benefits of the delivery of high-speed reliable mobile services which is essential to businesses, government agencies and the community.

The 2001 Census indicated that the Ballarat region employed 489 people in ICT occupations this represented 1.49 percent of the City's labour force. According to City of Ballarat data, this figure had increased to 630 and 1.9 percent of the labour force by 2006. These levels of ICT employment indicate that the Ballarat region has strong claims to being Victoria's leading regional centre for ICT.

Ballarat now has the highest proportion of ICT employees in regional Victoria and the third largest in regional Australia. This highly educated and skilled workforce has been a major factor in establishing Ballarat as a nationally and globally competitive ICT centre.

Ballarat ICT employment levels are expected to grow to in excess of 2000 employees by 2030. The City of Ballarat and Ballarat ICT Limited recognise the significance and potential impact that telecommunications will have on Ballarat and the surrounding regions, both in terms of the equity of access that it will provide as well as access to new generation broadband and modern high speed mobile infrastructure and a range of new and innovative services and facilities.

High quality state of the art mobile coverage is crucial to level the playing field for existing businesses and the well being of communities that are currently badly serviced in regional areas. Businesses will become more competitive with their capital city counterparts enabling new employment opportunities which will in turn have economic benefits to the regions.

To continue to build the ICT workforce and to encourage businesses in Ballarat and surrounds and to take advantage of this workforce and the competitive environment the use of modern high speed mobile coverage is essential. This will result in unique and tangible returns to the Ballarat community, contributing towards meeting its social, economic and environmental needs with potential to help reduce disadvantages such as unemployment and create dynamic and sustainable growth in the City and other regional areas.

Please find answers to question we feel we are qualified to respond to, questions we feel we are not qualified or do not have sufficient information to answer we will respond with a “not qualified to comment “

1. Would an appropriate minimum quality standard be that base stations must provide high-speed 4G LTE mobile broadband data communication services and also high quality 3G mobile voice and broadband data services? If this is not an appropriate minimum quality standard, what is?

The minimum requirement should be at least 3G with a short migration plan to 4G LTE or higher but ensuring the minimum must have adequate data transmission capabilities.

2. What are the most appropriate indicators that could be used to specify the minimum quality standards that should apply to the mobile services being provided through the programme? For instance, should it be a minimum received service signal indication (RSSI) in decibel milliwatts (dBm)? A similar approach was adopted recently in the UK where a comparable programme specified a minimum RSSI for 3G voice and basic data service of -85dBm on roads and -75dBm in community areas (outside premises).

World best practices should be used to specify minimum standards. These could be RSSI but a 3G minimum as used in the UK.

3. Does delivery option 2 for the \$80 million Mobile Network Expansion component raise any additional issues that need to be considered?

This may add more complexity into the process which in turn may add more costs therefore reducing coverage.

4. Could options 3(a) or 3(b) for the \$80 million Mobile Network Expansion Project be delivered in conjunction with options 1 or 2 to enable network infrastructure providers to compete with MNOs?

Depending, if they have an existing mobile platform, if not this may increase costs

5. Should bidders be able to propose to incorporate the use of base stations owned by NBN Co as part of their bid?

Although NBN Co towers are designed for line of sight they may be used for mobile applications if appropriate. These towers could definitely be used for backhaul services should the opportunity arise.

6. Should a joint bid (between a specialist network infrastructure provider and a MNO) be permitted? Should it be encouraged?

It may be too expensive and add more costs to have a wholesale and a mobile network provider combine to deliver mobile services.

7. Is it realistic to expect specialist network infrastructure providers to provide backhaul (recognising that they would presumably need to contract with a third party to provide this)?

Specialist Network providers for backhaul and contracting out of their services to a 3rd party seems to be a viable option.

8. Is option 3(b) suitable for Australia's regional mobile market?

This option may present many obstacles and add more hurdles than it solves, such as technologies and devices to be used now and in the future, roaming and even billing may have

issues for both wholesale and consumer customers

9. What are the appropriate specifications for a base station to be able to accommodate at least two other MNOs?

“Not qualified to comment “

10. Will the proposed open access provisions be sufficient to encourage other MNOs to use the base stations to provide mobile services?

The open access provisions seem to be sufficient to encourage other MNO's to use the base stations.

11. Should MNOs be required to pre-commit to/co-invest in the base stations for which they wish to share infrastructure?

To ensure a level playing field MNO's should be prepared to commit or invest in base stations on which they wish to share infrastructure.

12. What is the estimated additional cost of requiring all new base stations to meet the open access requirements?

“Not qualified to comment “

13. Should the proposed open access provisions be applicable to base stations funded under the \$20 million component or should there be scope to exclude some base stations from these requirements.

” Not qualified to comment “

14. What are the most appropriate models/benchmarks for establishing access and backhaul pricing and for reflecting in that pricing the value of the public funding received by the owner of the facilities (such that access seekers receive an appropriate discount from the market price for access to the facility)?

“Not qualified to comment “

15. Do the proposed assessment criteria achieve the right balance to deliver the best value for money outcomes?

The assessment criterion looks to deliver value for money. Allowances should be made for extremely remote areas which may not be covered by the criteria?

16. Should the proposed assessment criteria be weighted, and if so, how?

The assessment criteria most likely should be weighted but how this is to be done needs further analysis.

17. Is there a more effective means of assessing seasonal demand than proposed in criterion 3(c)?

Probably the best criterion is the number of people visiting these areas in peak periods. As this may be the peak earning period of these destinations it is essential that mobile communications are operating effectively.

18 .To what extent would the use of the NBN fixed wireless network result in improved mobile coverage outcomes in regional Australia?

For NBN to improve mobile coverage with their fixed wireless networks it would be necessary for NBN to plan the installation and or expansion of their network to deliver mobile services which is vastly different from their fixed wireless networks.

19. How best can a greater role for NBN Co improve competition and choice for consumers in regional Australia?

Should NBN redesign their fixed wireless network to incorporate mobile services, this may give customers greater choice and better pricing. NBN could then supply consistent backhaul pricing for all carriers which would not penalise services in regional areas.

20. In addition to base station location, design and backhaul access, what other considerations would NBN Co need to take into account if it were to also support mobile coverage and competition benefits as part of its mandate?

The opportunity for NBN to support mobile coverage and competition benefits may be beyond their current capacity which may affect their delivery of the fixed wireless and terrestrial broadband networks.

21. How can early engagement between NBN Co and MNOs be facilitated in the design of each base station? Is there a role here for the Australian Mobile Telecommunications Association (AMTA)?

“Not qualified to comment “

22. How can the Mobile Coverage Programme best complement any role that the NBN fixed wireless service plays in improving mobile coverage and competition?

Mobile coverage to be complemented by NBN fixed wireless as stated in question 20 would require a quantum shift in focus for NBN Co.