

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: 28/2/14

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):

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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.

SUBMISSION IN RELATION TO MOBILE COVERAGE DISCUSSION PAPER.

We live on a farm situated 10kilometres from the nearest town, 8.1 kilometres from national highway 1 (straight line distances)

We have no mobile coverage, and our phone provider's maps confirm this with advice that only satellite is available.

We rely on landline phones, when they are working.

We live in the lucky country.

It is pot luck here. What will today's lucky dip bring- will we have a phone line at all, or one that drops out mid conversation, or one that clicks and crackles so much you can not hold the phone to your ear or hear the other person, or just maybe we hit the jackpot and can make an uninterrupted call.

At the closing date for this submission we have had two phones lines faulted for 131 days. We have no idea when the lines will be repaired.

MOBILE COMMUNICATIN FACILITES SHOULD BRING MINIMUM PHONE STANDARDS AUSTRALIA WIDE

Much of this discussion paper relates to improving mobile coverage, providing coverage in areas with no coverage or to providing mobile new or improved coverage in towns and communities.

It does not make any reference to, or takes into account the telecommunication facilities in the areas.

There are places in capital cities which have mobile phone problem areas, but these people all have access to good quality landlines providing voice, fax, internet and television.

Likewise in a small country town or community, if they have access to phone lines and high speed internet, they at least have that.

Yet, in areas like ours where the copper landline infrastructure has failed and continues to deteriorate, and there is no reliable voice communications, we are not seen as a priority or consideration point.

Internet is non existent in our area, unless we use satellite.

The mobile coverage programme, along with the nbn review and the existing phone networks, should seek to achieve minimum communication standards across the country rather than seek to provide holiday makers with capital city standard mobile for their weekends away.

COVERAGE OF MAJOR TRANSPORT ROUTES

Is it necessary to provide coverage over all major transport routes?

If this is done at the expense of coverage in other areas, then it is not in the best interests of all.

In our region, the South West of Western Australia, there are extensive sections of Highway 1 that do not have mobile coverage. Other highways are the same.

Last year on Highway 1, travelling between Walpole and Manjimup I encountered a vehicle accident, and travelled almost 50 km through National Park before getting mobile reception to report the accident.

First and foremost coverage criteria along transport routes should be to provide emergency response in the case of accidents.

Time is critical in such instances and if mobile coverage can not be provided, the next best option is to inform people where the nearest coverage is.

If there is a gap and coverage exists 10 kilometres south and 30 kilometres north of an accident, it is critical the reporter of the incident gets to the available coverage as quickly as possible.

Signage of distance to normal hand held mobile coverage (to access 000 regardless of the phone provider) could be attached to existing 5km road markers.

Such signage would reduce report times, response times and ensure the appropriate response to incidents is achieved.

For the everyday mobile use, such signage would mean that they would be able to use a visual aid of a sign rather than picking up their phone while driving to check if they have coverage.

A second purpose of the signage could be to indicate when normal hand held range is about to drop out, say 5km before, in order for people to make any calls necessary before going out of coverage.

MOBILE COVERAGE FOR EMERGENCY SERVICES, PARTICULARLY FIRE FIGHTING

Of all of the emergency services here in Western Australia, the most ill equipped for communications are the volunteer bush fire brigades.

The police, ambulance, urban and town fire brigades and state emergency services all use designated vehicles equipped with appropriate radio facilities.

Fire stations, or more appropriately, sheds, often have no phone facilities and many do not have mobile coverage, so their use as a command and communications base is restricted.

Volunteer fire fighters attend fires in their own vehicles because the brigades do not have enough resources. These volunteer vehicles include units with fire fighting equipment, trailers with pumps and support vehicles (food, refreshments, replacement equipment and personnel).

The volunteers attend in their own vehicles with one purpose in mind to protect life and property by extinguishing or controlling the fire as quickly as possible.

The majority have no radio communication and in most cases there is no mobile coverage.

There is no way to pass critical information such as wind speed and direction changes to these units, or for them to pass information to others.

In a local fire this week, one vehicle was involved in a rollover. The radio was of no use due to damage to the aerials, and there was no mobile coverage.

Lives of fire-fighters and support personnel are put at risk by there being no mobile coverage.

CAN MOBILE COVERAGE BE "MOBILE"

The black spot program refers to "unique coverage problems, such as areas with high demand for services during seasonal holiday periods".

If this improves the ability to alert people to incidents, such as fires, or allows incidents such as accidents and fires to be reported quicker, there is a clear benefit.

If a "seasonal holiday period" is for say 8 weeks of the year, the facility may well be financially worthwhile to the provider during these periods.

Will it be worthwhile to maintain in the rest of the year?

Would providers switch off non financial services out of season?

This raises the question of whether mobile coverage can be made "mobile", by having relocatable towers and base stations that can be shifted to an area for such peaks.

This would provide a greater financial reward to the provider as they could maximise the usage of the facility by placing in a summer holiday location but move it to a winter holiday location rather than putting in two facilities.

If a "mobile" mobile facility is possible, is this a solution for natural disasters such as fires or floods when they occur?

CRITERIA FOR ASSESSMENT

In regard to the criteria for seasonal holiday periods, should weightings reflect

a) access to other mobile facilities, for example if the location is a camping area near the coast but 5km from a town with mobile coverage is the need as great as a location 25km from the nearest location with mobile coverage.

b) accessibility. If the location has limited road access, for example only one road into or out limiting access or egress in the event of a flood or fire , should it receive a higher weighting.

c) benefit all year round to residents and visitors,

d) the criteria should not be the number of sites/rooms/cabins available per day or annually, but based on the occupancy rates during the peak times.

e) the criteria should be based on current data and reflect recent changes. For example a town on the Hume Highway with 10 motels and hotels and 200 beds that has been bypassed should be assessed on occupancy rather than capacity that is no longer in demand.

f) approved subdivisions and approved planning applications should be weighted based on actual sales or sales rates as this could disproportionately affect the assessment, if the developments do not proceed.

New coverage created could be a cost benefit to a provider. In the instance such as our location where the landline facilities are have failed or are deteriorating faster than they can be maintained and repaired, it may be more cost effective for a provider to install a mobile facility than maintain the existing infrastructure.

Value for money for the commonwealth should also take into account the cost reduction to the Commonwealth where existing subsidised services are in place. For example we had satellite broadband under the Australian Broadband Guarantee and now have a subsidised NBN interim satellite facility. We are also eligible for a satellite phone subsidy.

What is the financial benefit to the provider? If the provider is only giving a service to existing customers on a set phone plan, what benefit to they achieve financially. Potentially they could be incurring greater expense.

If however, the network can be extended to new customers, such as ourselves, they will gain that additional revenue. A new customer on a \$60 per month plan would be better than an existing \$60 a month customer using more of the network.

Bruce Bebbington

