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:	Maryann Brooke , on behalf of residents of Boro and Lower Boro, NSW 2622
Name of organisation:	
Phone:	██████████
Email:	████████████████████
Website (if applicable):	
Date:	

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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? **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.

Introduction

The residents of the Boro and Lower Boro regions of the Palerang and Goulburn Mulwaree shires in NSW are seeking to have the Boro – Lower Boro area considered a priority location for mobile coverage upgrade.

This small community is significantly disadvantaged by poor mobile coverage. We welcome the Government's initiatives to improve mobile phone coverage and competition in regional Australia through the Mobile Coverage Programme.

The current very poor and patchy mobile coverage, together with problems arising from poorly maintained landlines, has created a hazardous situation for the community, particularly when accidents occur and critical health issues arise, and on extreme and catastrophic bushfire days.

Improved mobile coverage is essential to alleviate the potential risk to residents by ensuring that they are able to communicate effectively, receive warnings, take action in a timely manner and get assistance quickly when needed.

The discussion paper sets out a range of options for delivery of the Government's program for mobile coverage improvement, including addressing black spots. However, the paper gives the impression that the purpose of doing so is more to address commercial interests than to enhance the general well-being and safety of communities. We believe that there is an opportunity to improve communications in such a manner that emergency services and the community are better served. We urge the Government to give priority to health and safety in implementing its program.

Background

The Boro and Lower Boro residents form a small community, but one that has more than doubled in size over the last 10 years, without any commensurate increase in services.

The community is located around 70 km from Canberra, approximately 50 km south of Goulburn, NSW, about 45 km north-west of Braidwood and around 40 km north-east of Bungendore NSW. It is situated in a valley along a 13 km stretch of no-through road running from west to east in a high bushfire prone area.

While the western end of the road is mostly open farmland, a large proportion of the eastern end of the road is dense bushland and highly flammable, hence at significantly increased risk of a life threatening event, during the hot Australian summer. Homes can only be accessed from the west via the Boro road, a dirt road in relatively poor condition.

Most residents live on small acreages that are variously dense bushland or open grassland. Complicating access to services is the fact that the road follows the Boro Creek, with residences on the north side of the creek falling within the jurisdiction of the Goulburn Mulwaree Shire Council, and residences on the southern side of the creek falling within the Palerang Shire.

The area is regional but not 'remote', being within a daily commute of Canberra, Queanbeyan, Goulburn, Bungendore and Braidwood.

Issues

Reliable telephonic communication, including mobile coverage, is essential at all times, to summon help in the case of accidents or health emergencies and to keep informed and take action during bushfire emergencies.   It is not only an issue in locations that experience increased population during seasonal periods, but an ongoing issue in many parts of Australia where people live and raise their families.

A key expectation of most Australians now is that they have a redundant capability for communication, via internet, mobile and/or landline. In the Boro area this is not true and in many cases individuals and larger families have a single communication link, which is unreliable itself. Many residents do not have mobile phone coverage at their homes or in the vicinity of their homes and are dependent on fixed landlines, a situation made worse by frequent loss of the landline services (examples include the loss of landline services three times in the past three weeks for one number – reported to Telstra – the Telstra technician was himself unable to utilise his in-car mobile phone to check details as there was no coverage), possibly due to the age and state of the landline infrastructure throughout the area.

This problem is exacerbated by the poor coverage of the Rural Fire Service radio network in many of these areas, with trucks routinely having to relay messages via alternate stations due to the poor coverage of emergency service radios throughout the area. This presents an opportunity to broaden the expectation of the mobile coverage program to allow not just MNOs but also emergency services to co-locate antennae and re-transmission facilities at any such tower, increasing the net community value derived for the Federal Government from its expenditure.

The nearest mobile tower is at Tarago but is blocked by the granite ridge that runs on the north side of the Boro Creek. While many residents access the Internet through a satellite connection (as provided by the older Broadband Guarantee or the newer National Broadband Network interim satellite service), the existing congestion on these satellites systems and the high latency of satellite internet connection results in low signal strength and often slow or no access to the internet.

An effective mobile phone network would greatly assist the local community in the 21st century. The examples below serve to illustrate how important it is that the local communications be improved to ensure the safety and well-being of the community.

Accidents and health emergencies
There have been a number of accidents in the community where mobile coverage would have helped relieve suffering, ensured quick access to emergency services and may have avoided death. Below are just a few examples:

1. A lady was visiting her daughter and son in law when she broke her hip. Her daughter was at work in Canberra and the son was out fighting a bushfire. She lay in pain from around 9.00 am until the son-in-law returned at 5.00 pm. She had been trying to reach the landline, but was unable to do so. With access to a mobile service she could have summoned help immediately.

2. One elderly resident accidently shot himself in the foot with a shotgun and lay bleeding on the floor of his home. He was fortunate that a neighbour called in and found him there. Otherwise he may have died.

3. A gentleman affected by early onset dementia became confused and wandered in an unaccustomed direction. His family were looking for him but, without reliable mobile reception in the area, did not have access to a locater device, and could not use mobile phone communication to coordinate their search for him. He was hit by a car on the Goulburn-Braidwood road before he could be found, and died from his extensive injuries.

By contrast, another lady who lives in an area with mobile coverage fell and broke her ankle in the driveway, some metres from her home on a day of extreme heat. She was able to use her mobile phone to call a neighbour for immediate help. Without mobile coverage it would have been several hours before she was found.

Bushfire emergency
During a catastrophic bushfire day in January 2013 many people had neither mobile nor landline phone access and did not get the catastrophic fire day warning. Among the numerous fires in the region was a serious fire travelling along the Kings Highway in a westerly direction. This fire was expected to impact the area to the south of the Boro Road, and with a predicted wind change from westerly to southerly the entire Boro Road was under threat. Without mobile and landline phone coverage it was impossible to determine where residents were, who had stayed with their home, and who had left. It was also impossible for those staying behind to find out where the fire actually was, to be contacted by authorities, or to contact family and neighbours. They were totally isolated.   This was a very frightening situation. There was a lot of thick smoke and the sky was red. Fortunately the brave efforts of volunteer fire fighters prevented the spread of the fire and saved many homes in the process.

The concerns of residents were raised with the then local federal member, Mike Kelly, and with Telstra. Attention was drawn to the poor mobile phone reception in the area, the frequent disruption to landlines and the delay in getting faults fixed experienced by several residents. Telstra advised that they would review reported complaints, but otherwise it was unlikely anything would happen before the roll out of the NBN. Such a response is clearly inadequate, particularly as the NBN will not address the mobile phone coverage issue.

Not having mobile phone reception available on catastrophic and extreme fire days is very dangerous. When this is coupled with the fact that landlines are also often faulty, the situation is dire indeed. This is particularly the case because the Boro Road along which residents have their properties is a 'no through' road, running from west to east. There is just the one way in and out. The eastern half of the road is thick bushland and tinder dry in summer. The prevailing winds are westerly, and any high fire danger period poses a high risk for residents at the eastern end of the road with the only egress directly through a high fire danger zone, potentially into the face of an oncoming bushfire. It is a catastrophe waiting to happen.

Residents need to be alerted early on when there is a high, extreme or catastrophic risk of fire. They need to be able to communicate quickly and effectively with each other and with a nominated coordinator and the local fire control to keep informed of developments, establish and notify their proposed actions and whereabouts. Residents have met to see what might be done to coordinate safety at the local level, consistent with best practice advice coming out of the aftermath of the Canberra and Victorian fires.   However, without adequate communications the success of these efforts is limited. There is an active Volunteer Fire Brigade, but this is stationed at Mt Fairy some kilometres away, and may well be already out fighting other fires.

Resolving the issues

Some years ago Boro residents and indeed residents all the way to Nerriga were able to obtain phone coverage by installing an external antenna, usually on the TV mast. Telstra in their wisdom decided to switch off this service from their Braidwood tower. There is now an extensive black spot in the Shoalhaven valley and tributaries north of Braidwood, including Boro, the Goulburn-Braidwood road, Windellama and Bungonia, and the main road from Canberra to Jervis Bay (Main Road 92) which is now receiving significantly increased traffic.

A solution to this black spot could be the installation of a phone tower or indeed an NBN wireless station on Mt Coghill, which has clear line of sight to most of this region. Back haul could be via microwave to the Tarago Telstra tower. Power will shortly be located within 950m of a Mt Coghill tower and the adjoining land owner would have no objection to providing an easement. The co-location of multiple

capabilities at a single point would meet, and in many ways exceed, the ideas proposed in the discussion paper – offering a hosting ability at marginal additional cost for emergency services to better service across the broader Boro, to Nerriga region and into the Shoalhaven valley.

It would be insufficient to base the assessment of need on the recently released NBN website (MyBroadband website: http://communications.gov.au/mybroadband), as in the case of Boro the expressed mobile coverage is specifically incorrect, based on the personal experiences of Boro residents.

In relation to program implementation, this submission supports approaches that enable full consideration of black spot areas and their impact on communities. Such black spots should not be limited to those areas where there is a commercial interest, eg holiday destinations, but should, as a priority, take into account community health and safety. Development of the list should be undertaken by the Federal Government in consultation with State Governments and local councils, noting that this submission crosses Local Government Area boundaries. It should not be left to mobile service operators whose focus will be on commercial rather than community gain.

This submission further urges the Government to adopt as flexible an approach as possible in regulating and contracting the services, to encourage and support value for money service delivery to communities through effective competition and service provider collaboration.   A 'one size fits all' is unlikely to be effective for the many and varied regions of Australia experiencing poor mobile coverage. On balance, Option 3 would appear to be preferable.

The value for money assessment criteria outlined at para 5 of proposed assessment criteria (p12) fail to actually give any weight to the idea of black spots or 'unique' issues and instead seek only to remediate by mass numbers – this is not in the spirit of the previously identified areas of improvement in mobile communications. It is recommended that consideration be given to this criteria being broadened to include improvements that reflect an increase in a community's sense of wellbeing and changed risk profile for natural disasters and health and safety.

This submission does not support proposals that would require co-contributions from the community. Such contributions are not required of people living in the more populated areas of Australia. In particular, such co-contributions are not required to support essential and emergency services to ensure community safety. Any additional funding required to address black spot areas for reasons of community health and safety should be treated and funded by the Government as a community service obligation.

Conclusion

The Discussion Paper seeks to maximise the value achieved for Government by seeking to encourage competition and address black spots. A broadening of the utilisation of any underpinning infrastructure (base stations) would increase the value to Government and significantly increase the value to the community; most especially those where emergency services and mobile communications are currently poor or non-existent.

Boro presents as one such community, seeking the assistance of the Federal Government to increase the safety and well being of its members and reduce the risk to their lives from poor mobile communications.