

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:	Clarence Valley Council
Phone:	
Email:	
Website (if applicable):	www.clarence.nsw.gov.au
Date:	25/2/14

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.



25 February 2014

Contact: [REDACTED] Reference: [REDACTED]

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

Dear Sir/Madam

The Clarence Valley Council is the largest coastal Council in NSW, covering 10,441 square kilometres with a population of 51,300. The population has a wide dispersal; 1 city and 43 towns and villages. It is also a Council that has a long history of major natural disasters due to flooding (four major floods in the last five years), bush fires and east coast lows impacting on the coast line. One third of the Council area is made up of State Forest and National Parks which have a history of major fire events.

The Clarence Valley has a major tourism industry with over 1 million visitors a year, many now not only visiting the coastal locations but the hinterland. Visitors now frequent the upper reaches of the Clarence River and the National Parks. Much of this area has only marginal mobile coverage and lots of black spots along the major arterial roads.

To this end Council endorses the \$80 million mobile expansion network along major transport routes in small communities that are prone to natural disasters. There is one major highway route and three major regional roads that have patchy coverage; the Gwydir Highway, the Armidale Road, the Clarence Way and the Wooli Road. The first three roads follow the branches of the Clarence River which is subject to major flooding and bisect the National Park and Forestry system which are prone to major bush fires. To alleviate the black spots along these roads would be a major assistance to the emergency services which operate in these areas and to the safety and amenity of the residents. The additional benefit would be to service the wilderness tourism presence in the upper Clarence River increasing both safety and economic yield in these areas.

In the coastal locations, where many of our town and villages see a doubling of their population in peak holiday periods e.g. Iluka, Brooms Head, Minnie Water and Wooli, the mobile coverage is variable and the quality can be variable due to overload. Hence a further investment in upgraded mobile coverage would be a major advantage to these tourist economies.

Comments to questions in the discussion paper:-

Q1 and 2 - Agree with the minimum standards approach. Note: a major problem in data communication in regional communities is the problem of overload especially in peak hours. The roll out of NBN in the Clarence with fixed wireless is happening now and will alleviate this issue to some extent. Hence as noted in the paper on page 13 integration of normal telecommunication services with the NBN roll out is essential.

Q3 - The issue with open competition with MNO's is that in the regions Vodafone - Hutchinson Australia has very poor coverage. To the extent that while we have several Telstra and Optus retailers in the Clarence Valley there is no Vodafone presence at all, simply because there is no adequate network. Both Telstra and Optus

have a strong presence backed by a major wireless network. In the last few years Optus has had a major investment in the Clarence.

Q4- 8 - The equal sharing of towers between Optus and Telstra in the Clarence Valley would be an ideal outcome and give seamless transitions for all users. One of the frustrations from Council's point of view is that quite often we see two towers side by side, due to competitive tensions between these two carriers. Most of this is around height of antennas. Therefore, 3a makes a lot of sense, 3b would be a departure from what sometimes is normal operation by the two providers when they share towers or Council infrastructure e.g. water towers.

Already NBN is accessing other providers' towers for their equipment, it then makes sense that NBN towers are made available for the commercial providers.

Q9-14 - Council is not in a position to comment on the technical specifications here. But the concept of the base station to be designed and built to support two additional MNO's equipment is seen as essential and an efficient use of limited Government resources as discussed above. The issue of how towers integrate with the existing network of towers owned by Telstra and Optus is an obvious issue that needs to be solved, as it is Council's understanding the network relies on line of sight between towers at present. Not all towers have direct connection to exchanges. So backhaul arrangements are crucial.

Q15-17 - In assessment category 3 there maybe a conflict between the natural disaster ambitions in (a) and (b). In many cases the large villages may have some mobile coverage but for emergency services serving isolated properties this will not solve their problems. By ensuring that there are no blackspots along the highways/arterial roads in many rural communities most isolated properties will be picked up or be relatively close to mobile coverage. The emergency services also will then have seamless access along these roads and enable tourist contact (safety) through the SMS alerts also.

In assessment step 1 it maybe that the Department of Communications should do preliminary assessments on the areas that are prone to natural disasters as a first sieve, it would be onerous for the communication providers to do this. The Commonwealth and State Governments have this data collected through their natural disaster relief arrangements.

Q18-22 - In the Clarence Valley NBN is rolling out 23 fixed wireless facilities. The wireless roll is mainly aimed at villages with populations of around 500 and above. Most of these sized villages already have coverage by either Telstra and/or Optus or both although in some cases the quality of this coverage is poor. The reality is this still leaves large areas along the arterial road system which has no coverage for the emergency services especially in floods and bush fires in the Clarence Valley. Given the large tourist inflows now accessing the Clarence River and National Parks in the upper catchments this provides a particular problem for emergency access and it also hinders bush fire fighting by the RFS especially in the large areas of State Forest and National Parks.

If you require further information please contact [REDACTED]
[REDACTED]

Yours faithfully



Richie Williamson
Mayor