

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:	[REDACTED]
Name of organisation:	Gracetown Progress Association Inc.
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Website (if applicable):	
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

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.

GPA Submission

The Gracetown Progress Association Inc. (GPA) represents the community of Gracetown; a small coastal settlement in the South West of Western Australia. Gracetown is part of the Margaret River Region, and is situated on Cowaramup Bay. The following facts associated with Gracetown are directly relevant to this submission:

- Gracetown is a community of around 150 houses, of which approximately 30% are permanently occupied and the balance are holiday houses, many of which are available for rent on a short term basis. Within 4km of Gracetown are a caravan park and a number of additional permanently occupied dwellings. In peak periods the population of Gracetown swells from approx. 100 to 150 residents to at least 700 residents. The occupants of the caravan park and surrounding dwellings are additional to these estimates.
- There is currently a proposal before the Augusta Margaret River Shire to double the number of dwellings in Gracetown.
- There is no reliable mobile telephone coverage in Gracetown. The topography of the town is such that it slopes steeply from the Leeuwin Naturaliste Ridge at the back of the town towards Cowaramup Bay. From some elevated parts of town it is possible to pick up weak signals from Telstra or Optus, but these are intermittent and unreliable and in any event do not provide data access. Users of other MNOs have no chance of a signal. Gracetown is a blackspot for mobile coverage, just as it was a blackspot for analog television coverage.
- Gracetown is renowned for the surf breaks in and around Cowaramup Bay, and these breaks are acknowledged as among the best in the region, which itself has world wide recognition for the quality of its surfing. As a result Gracetown draws large numbers of visitors, particularly during the summer months, wishing to access these surf breaks.
- In addition to the surf breaks Gracetown has the closest safe swimming beach for a large number of residents of and visitors to the surrounding area, which is centred on the town of Cowaramup, as a result of which the beach is heavily used throughout the summer by residents of and visitors to both Gracetown and the surrounding area.
- Gracetown has the only boat launching ramp between Prevelly and Canal Rocks, a distance of over 40 kilometers.
- These facilities and attractions draw thousands of people to Cowaramup Bay and Gracetown. While summer is the busiest period, there are also periods of significant visitation throughout the year.
- Gracetown is in an area of extreme fire risk and fires have threatened the town several times over the past few years, most recently in November 2011 and January 2012. In addition Gracetown has been the scene of many emergencies over the years, including fatal shark attacks (2004, 2010 and 2013), a cliff collapse which resulted in a large number fatalities and injuries (1996), boating accidents (e.g. 2002) and other medical emergencies.
- Gracetown is the base for the Margaret River Volunteer Marine Rescue Group and the Gracetown Fire Brigade. Members of these volunteer service groups have for many years stated that the lack of mobile phone coverage severely hampers their efforts in responding to emergency situations.
- The GPA has been in discussion with Telstra and its contractors for the construction of a telecommunications tower for the past 10 years. The wider community also supports the construction of such a facility at Gracetown, as evidenced by letters of support from the Margaret River Volunteer Marine Rescue Group, Margaret River Police, Gracetown Bush Fire Brigade and Friends of the Cape to Cape Track. Copies of these letters are reproduced below. Further, in response to a recent planning submission by Teltra to the Augusta Margaret River Shire for the construction of a telecommunications tower at Gracetown, the Shire received 99 submissions in favour, 2 against and 2 neutral.
- The Augusta Margaret River Shire, at its meeting on 11 December 2013, approved the construction of a telecommunications tower to a height of 60 metres on the ridge above

Gracetown, however the GPA understands that due to a lack of funding there are no immediate plans to construct the tower.

It is clear that Gracetown is in dire need of reliable telecommunications coverage. The fact that people in the main township and in the surrounding areas have neither mobile phone nor emergency services radio communications coverage puts both residents and visitors at a great disadvantage from a social as well as a personal safety point of view. The lack of such basic coverage is unacceptable in the 21st century. It is also not acceptable that Telstra is permitted to further delay construction of the tower citing lack of funding when they clearly have sufficient funding to provide coverage.

The GPA therefore submits that Gracetown should be on both the lists for the \$80 million Mobile Network Expansion Project and the \$20 million Mobile Black Spots Project. Gracetown is a small community that is vulnerable to natural disasters and has a high demand for services during seasonal holiday periods.

With respect to specific aspects of the MCP Discussion Paper, the GPA has the following additional submissions and observations:

Delivery Options

We do not have a preference for which delivery option is selected, provided that the open access and co-location provisions are available, encouraged and enforced. It is very important that residents and visitors have access to reliable mobile coverage for both voice and data regardless of which MNO they are with. A situation where, for example, Telstra was permitted to entrench its monopoly position by constructing and then effectively having sole or dominant use of the tower would be untenable.

Proposed Assessment Criteria

Question 15 – the co-contribution and value for money criteria (4 and 5) will act against small remote communities such as Gracetown where the resident population is sparse, and neither the local community nor the shire have resources available to make co-contributions. These should therefore be given very low weightings, if they are retained as criteria at all. Also, giving undue weight to criteria 7 (commitment from more than one MNO) will also mitigate against smaller communities with large seasonal fluctuations in population. Also, open access (criteria 6) should be a basic requirement rather than simply one of the criteria to be assessed.

Question 16 - the assessment criteria should be weighted to ensuring provision of coverage in areas where lack of coverage will result in a risk to life in the event of natural disasters or other emergency situations.

Question 17 - The focus of the extent of coverage benefit (criterion 3) on the number of dwellings or length of roads does not adequately weight the more critical factor of number of people covered or likely to be covered, or the importance of the availability of coverage in emergency situations. **Criterion 3(c)** is not an effective means of assessing demand. Using Gracetown as an example, the number of premises or dwellings or accommodation units on offer bears very little relationship to the number of people using the area at any given time, as most people in the area will travel in from outside Gracetown. When they arrive, people will disperse throughout the area, accessing a number of surf breaks, at the beach, in dwellings or at sea in boats. All of these people are in need of coverage and, in the event of an emergency such as a fire, are at serious risk in the absence of reliable communications.