

# Mobile Coverage Programme Discussion Paper

## Submission Cover Sheet

Submission Information	
<p><b>This cover sheet should be attached to submissions made to the Department of Communications in relation to the Mobile Coverage Programme Discussion Paper.</b></p>	
<p><b>Contact Details</b></p>	
Name of respondent:	[REDACTED]
Name of organisation:	Greater Taree City Council
Phone:	[REDACTED]
Email:	[REDACTED]
Website (if applicable):	www.gtcc.nsw.gov.au
Date:	28 FEB 14
<p><b>Confidentiality and privacy</b></p> <p>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.</p> <p>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.</p> <p>Do you want all or parts of the submission to be treated as confidential? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><i>If yes, identify below which parts of the submission are to be treated as confidential (and provide a reason):</i></p> <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div> <p>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:</p> <p><b>Submission Instructions</b></p> <p>Submissions are to be made by <b>5:00pm (AEST) Friday 28 February 2014.</b></p> <p>Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text-based formats via the email address <a href="mailto:mobilecoverage@communications.gov.au">mobilecoverage@communications.gov.au</a></p> <p>Alternatively, submissions can be sent to the postal address below (to arrive by the due date):</p> <p style="margin-left: 40px;">The Manager Mobile Coverage Programme Department of Communications GPO Box 2154 CANBERRA ACT 2615</p> <p>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.</p>	

Greater Taree City Council  
Submission to

Department of Communications  
on

Mobile Coverage Programme  
– Discussion Paper

28 February 2014

## Summary

The Greater Taree City Council is the local government body for the Manning valley which is a regional area that experiences mobile coverage issues both in the regional centre of Taree and the outer lying towns and villages. These areas also include the coastal towns of Harrington, Old Bar and Hallidays Points. These towns have very poor mobile coverage and are also holiday destinations that experience peak loads.

In 2011 GTCC conducted a mobile coverage test. The test was done to help us make an informed decision on which mobile carrier to use for our fleet of mobile devices. The test was conducted by choosing test sites around the Local Government Area (LGA) and then trying to make a call. At each site three phone calls were made from the same device after swapping out the SIM card, one for each of the three mobile carriers. The sites were chosen as places that we would expect to get phone signal and did not include the whole LGA. The results indicated that Telstra and Optus were close at 93.64 % and 92.11 % coverage of the test area respectively while Voda phone was 72.37 %. A pass was given if a phone call could be made and understood.

Another test was conducted to show the extremities of the phone signal by simply driving until the phone lost all bars of signal strength. This test was only done using Telstra.

As regional area we are also affected by natural disasters the Manning Valley experienced flooding during two separate events in 2011 and a fire emergency during the October 2013 bush fires. While flooding affects the whole valley the recent fires affected the Old Bar and Harrington communities. Showing that as a region we are regularly affected by multiple types of disasters.

We think that better value for money can be achieved by utilising economies of scale with one MNO that has proven capacity to deliver services to regional Australia especially if combined with the NBN Co by using NBN towers and backhaul. That provider is Telstra which already has the best coverage in our area. This does mean that there is a lack of competition in our area which would be perpetuated by awarding all funding to one MNO. Consideration needs to be given to requiring new sites, that are established using federal funding, to be made available to all MNO's either via wholesale or access arrangements.

# Response to Questions raised in Discussion Paper

**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?**

We see this as an appropriate standard; currently there are only a small number of Telstra base stations in Taree that have 4 G LTE. All other sites in our LGA are 3 G and GSM only.

**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).**

We are unable to make a comment for this question.

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

Additional issues that need to be considered are the loss of economy of scale by spreading the available funds across three companies. In addition Telstra has a proven record plus they have the best coverage and performance in our area already. This needs to be balanced to also maintain competition perhaps new base station must allow access to other MNO or must allow wholesaling to them.

**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**

## Mobile Coverage Programme

### **MNOs?**

Yes they could it would provide the best options for competition as this type of company does not have a vested interest in which MNO gets the most mobile customers. There is a risk that the towers are placed in areas that don't offer the best coverage and therefore MNO's will be not willing to use these locations. The threat that causes this risk comes because network infrastructure providers are not in the business of providing mobile services and they may not understand both the market or technology.

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

Yes, with the appropriate commercial consideration, this should lead to an improved service for the community.

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

We are unable to make a comment for this question.

### **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)?**

We are unable to make a comment for this question.

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

Yes, we are assuming that companies are willing to invest in regional Australia based on market factors, which will be offset by the proposed grant funding.

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

We are unable to make a comment for this question.

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

Yes if regulated correctly.



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

Yes, otherwise tax payers money could be wasted by building infrastructure not were it is needed and this will also help to mitigate against the risk identified in question 4.

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

We are unable to make a comment for this question.

**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?**

We are unable to make a comment for this question.

**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)?**

We are unable to make a comment for this question.

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

Yes we believe that the assessment criteria does achieve the right balance.

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

We are unable to make a comment for this question.

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

# GTCC Submission to DoC on Mobile Coverage Programme

Not without gathering long term data on usage.

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

We are unable to make a comment for this question.

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

Currently Telstra provide the best service because they have invested in infrastructure over the long term. Part of this investment is likely to have occurred when it was a government organisation. The only way to improve competition is to provide good quality infrastructure that multiple carriers can use at a cost effective rate. This leads toward allowing MNO's to use NBN infrastructure and backhaul at competitive rates.

## **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?**

We are unable to make a comment for this question.

## **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)?**

We are unable to make a comment for this question.

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

NBN fixed wireless services can play a role by using NBN towers and backhaul as previously discussed.