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:	**Gulf Savannah Development Inc**
Name of organisation:	Gulf Savannah Development Inc
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Date:	28th 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.

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The Manager
Mobile Coverage Programme
Department of Communications
GPO Box 2154
CANBERRA ACT 2615
Date:26th February 2014

By Email: mobilecoverage@communications.gov.au

RE: SUBMISSION – MOBILE COVERAGE PROGRAMME DISCUSSION PAPER

Dear Sir/Madam,

Gulf Savannah Development (GSD) is a regional development organisation incorporating the Shires of Burke, Carpentaria, Doomadgee, Mornington and Etheridge as its members as well as having Corporate voting members being MMG/Century and Ports North.

GSD welcomes the opportunity to make a submission to the discussion paper. GSD believes that modern metro comparable telecommunications are essential if regional Australia is to thrive and develop.

This submission addresses the discussion paper in two ways. Firstly by highlighting blackspots in the region and secondly give some feedback on the particular questions raised in the discussion paper.

Gulf Savannah Development has the unique blend of on the ground representation through its membership base comprising Local Government, Industry and Business to work collaboratively with all levels of Government to achieve outcomes in regional Australia.

<u>Blackspots</u>

In the first instance GSD advises that numerous Mobile Telephone "blackspots" exist in the following areas:

- Significant parts of the Gulf Development Road and more broadly the Savannah Way (Cairns to Broome) have no signal at all
- Significant Parts of Mornington Island no signal at all
- Township of Gregory – No signal at all
- Wills Developmental Road and Burke Developmental Road - 20 km South of Burketown through to Cloncurry (Approx 500km)
- Burke Developmental Road - Normanton to Cloncurry (Approx 400km)
- Burketown to the NT Border (Excluding Doomadgee Approx 200km)
- Gregory to Lorne Hill – No reliable signal (25,000 vehicle movements p.a Approx 100km)
- Significant parts of the Peninsula Development Road have no signal at all
- Wills Developmental Road – MMG Century Mine to MMG Dugald River Mine

ANSWERS TO SPECIFIC QUESTIONS

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 MNOs?

Yes it could be. At the end of the day we are all seeking an effective service at the best price. From a risk management perspective and competitive perspective it would seem sensible to share the risk among various providers and allow consortiums to price on proposals they can deliver.

Obviously there will need to be some "bundling" to take place during negotiations to ensure that those providers who can supply the more profitable areas also take a share of the pain in the less profitable areas. This will decrease the need for any potential operational subsidisation by the Government.

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

Yes they should. The Infrastructure installed by NBN Co is a public asset and as such should be available to provide what is essentially an essential public requirement ie the right to Mobile Telecommunications. NBN Co would of course charge some sort of access and ongoing operational fee for the use of the Infrastructure however the more duplication that can be reduced coupled with investment in quality Infrastructure with inbuilt redundancy the better off regional Australia will be. These savings could then be put toward the building of Infrastructure in more remote less profitable locations.

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

Yes it should be allowed. Providers should be encouraged to put forward the best proposal to meet the specifications. It should be up to Providers (whether it be a Consortium or individual entities) to determine which configuration/model will deliver the best results.

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

Roaming network compatibility would be highly desirable particularly in light of the desire to increase tourism and increase industry to the region. Enabling the network so that it can roam seamlessly between Provider Networks so that regardless of which Provider a Customer chooses the User can still utilise and access the network. This is not dissimilar to the principle whereby ATM cards may be utilised at any facility regardless of the card provider with the User paying a small fee for the convenience. By enabling such a network within telecommunications it will encourage tourism and Industry giving Users the choice of utilising the Carrier which best suits their individual requirements.

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

In addition to the criteria proposed an allowance should be made regarding value for money outcomes for the consumer. That is to say proposed pricing plans should be included by the Tenderer so as to gauge to what extent Companies are prepared to cross subsidise less profitable areas from more profitable areas resulting in a better deal for the Consumer.

A bond or Bank Guarantee should be required of the service providers guaranteeing that the network will be serviced and maintained to an acceptable standard over a 10 year period. To that end minimum service standards, uptime percentages and maintenance regimes should also be required of potential Service Providers. Ideally Asset Management Plans could be submitted or some other substitute.

Finally a model should be developed which assess the proponents from a value for money perspective. I think the key outputs need to be distilled and rated above all else.

Such examples of key deliverables/outputs would include items such as price to the Consumer, Service Quality, Coverage, network uptime and installation timeframes.

Downtime due to flooding particularly in Northern Australia should be included as part of the specification and requirements.

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

Critical elements such as Consumer Price, Network reliability and Coverage area and signal strength/quality should be given the highest weighting.

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

It should be noted that a large number of Tourists in remote and regional Australia are backpackers and "Grey Nomads" who do not necessarily all reside in official accommodation. Perhaps Traffic Counts compared to standard non seasonal counts could be used in conjunction with the accommodation numbers to ascertain an increase in "baseload" numbers.

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

NBN has a significant role to play in the effective delivery of this program. Firstly NBN co has already collected a significant amount of technical data on existing networks and capacities and this could be used in the assessment process. Similarly the Infrastructure blueprint both current and proposed should be taken into account when assessing the Tender so as to avoid any duplication and wastage.

Communications plays a vital role in many areas however this role is magnified in remote and Rural Australia given the tyranny of distance. The good news is that these issues can be overcome by metro comparable telecommunications. Areas such as Education, Training, Medical, Business, Social and Safety will drive forward regional Australia and should strive to give residents of those areas equal footing with those services which exist in more populated areas.

Conclusion

In conclusion thank you for the opportunity to make a submission to the Mobile Coverage programme. Metro Comparable services are an essential part of ensuring that regional Australia forges ahead both from a human/social and economic perspective. Regional Australia has a lot to offer however much of its potential is held back by a lack of key Infrastructure and Communications is one of the fundamental

Please do not hesitate to contact me with any queries regarding this submission or any related matters. GSD stands ready to work with the Mobile Coverage Program to ensure that not only Gulf Savannah but all of regional Australia enjoys metro comparable communications.

Yours faithfully

S C AGIUS
Acting Chief Executive Officer
Gulf Savannah Development