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:	▉▉▉▉▉▉
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Date:	28/2/14

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):

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.

Hawkesbury City Council

Hawkesbury local government area is located on the north-west edge of the Greater Sydney Region. It is the largest LGA in the metropolitan area and is centred on the upper reaches of the Hawkesbury River. Windsor is its civic heart, and there are towns and villages dotted along the river and in the foothills of the Blue Mountains. Urban, rural, remote and natural lands make up the area, with 72% of lands being National Parks (representing about 20% of Greater Sydney's National Parks and Reserves).

Hawkesbury LGA played a role in the foundation of our Nation, and is home to four of the five Macquarie Towns founded in 1810; most of the Greater Blue Mountains World Heritage Area; RAAF Base Richmond - the first in NSW and closest to Australia's largest population (Sydney), and is a thoroughfare for communication and transport, between Sydney and regional NSW.

SUBMISSION

February 2014

Mobile Coverage Programme: Discussion Paper
Australian Government. Department of Communications

Hawkesbury Local Government Area (NSW) – Mobile coverage BLACK SPOTS

Hawkesbury City Council welcomes the opportunity to comment on the formulation of the Mobile Coverage Programme (MCP) through the Discussion Paper, on behalf of the community of the Hawkesbury local government area (LGA).

The Hawkesbury community has for some time now experienced less than satisfactory fixed and mobile telephony coverage in the local area, to the point that there are a number of locations in which there is no or very poor coverage, which also means adequate broadband services. This is in light of the digital era and economy that is being embraced rapidly by residents and consumers, and promoted by the Australian Government; a head of fair telecommunications infrastructure provision. Inadequate telephony infrastructure and services needs to be addressed immediately in the Hawkesbury LGA.

In particular, mobile phone coverage in a number of locations in the Hawkesbury LGA is very bad with poor or no coverage, notwithstanding claims made by telecommunications service providers, which is frustrating and unacceptable in this day. The MCP is an important opportunity for mobile coverage black spots in the Hawkesbury LGA to be identified and addressed with the support of the Australian Government who too wishes to see better mobile phone services for Australians in regional areas to allow daily activities to take place.

<u>The Hawkesbury LGA has black spots on major transport routes, in small communities, in areas prone to bushfires and flooding and in locations that higher demand for mobile telephony in seasonal/ event periods.</u>

Comments on matters raised in Discussion Paper

(a)   MCP funding

Council supports the Australian Government in undertaking the programme and allocating $100million to the programme for use in two funding streams. Subject to the success of MCP, the Australian Government is encouraged to continuing funding the programme to address all locations that need improved mobile coverage and black spots.

(b) $80million Mobile Network Expansion Project – National Mobile coverage Black Spot list

The development of a mobile coverage black spot list, based on the criteria outlined in the discussion paper is supported. It is suggested that the Australian Government includes advice from local government on the 'state of mobile coverage' in the criteria, given councils are often the first point of contact for residents, business and visitors on daily mobile coverage and services issues and experiences. Hawkesbury Council sought feedback from the community of Hawkesbury during 2013 on telecommunications issues and experience in the Hawkesbury LGA, which has helped confirm the black spots in the area. Local government should at least be involved in the mapping and drive testing of local areas, as it knows local areas and the range of service issues contributing to black spots.

Hawkesbury LGA covers an area of about 2,800 sq. km, and it's the largest local government area in the Sydney Region. Figure (1) places the Hawkesbury area in the context of the Sydney Region, showing it is the size of the rest of the Sydney Region put together. Yet, while the Hawkesbury LGA is technical in the Sydney Region, it is a region on its own, as it does not enjoy the same level of telecommunications infrastructure, coverage and services as the rest of Sydney.

The Hawkesbury LGA follows the Hawkesbury River from Yarramundi in the west, at the foothills of the Blue Mountains, to St Albans's/ part Wisemans Ferry in the north. The Hawkesbury River system is made up of five rivers/ tributaries that dissect and make up the character of the locality. The river is Sydney main water supply systems and is prone to flooding, with the area experiencing floods in 2012 and 2013. On top of this, the fast bushland in the area, on private properties and as part of the Greater Blue Mountains Word Heritage item is prone to severe bushfires as experienced in 2013 around Kurrajong Heights, Bilpin, Mt Tomah, Colo Heights-Putty (including Winmalee).

Hawkesbury LGA is about 70kms to the start of the Hawkesbury at Windsor from Sydney central and 40km from Parramatta. Travel to the area by car from within the greater Sydney region is a 'good hour'. The area includes three major transport routes, being Colo-Putty Road to the Hunter region, Wisemans Ferry Road to the Central Coast region and Bells Line of Road to the Central West region. The area is a cross road for intra state traffic. The area is made of urban lands (mainly in the south –eastern), rural lands, remote lands and natural lands – waterways and bushlands, including National parks and reserves. See Figure (1)

The Hawkesbury area is the third oldest settled area (since Colonial times) and has played an important role in the foundation period of Australia (eg. towns, agriculture, governance, identities of history). The community and development is concentrated in the south-eastern corner of the Hawkesbury area, where most of the (small) towns and villages are located - scattered across the lowlands near the Hawkesbury River or on the foothills of the Blue Mountains. The main towns are Windsor and Richmond. The population is about 64,000.

Understanding a little about the history, geography, distance and settlement pattern gives us an insight into the likely inadequate telecommunications infrastructure, coverage and services encountered by the community in their daily lives, let alone what might be encountered by visitors traveling in the area, coming from other parts of Sydney assuming that their mobile phones will

work wherever they go. The community of Hawkesbury, outside the main towns of Windsor and Richmond, experience less than satisfactory mobile coverage, that is, it ranges from poor, to very poor, to non-existent, because they are located in small villages/ communities scattered along the main transport routes that follow the Hawkesbury River or access the Blue Mountains. This makes it hard to communicate with family and friends, undertake business with suppliers/ customers and visitors in the area, let alone communicate with the rest of Sydney and the country. Poor mobile phone coverage also raises serious concern for emergency situations in the area, which is prone to bushfires and flooding and being able to effectively conduct emergency response and communicate with residents and visitors (to local tourist facilities) who may be at risk.

Council for some time has been aware of poor and non-existent mobile coverage in the non-urban lands locations of the Hawkesbury area as members of the community continually approach us to assist with trying to improve the situation with telecommunications providers. In 2013, Council called for feedback from the community of Hawkesbury to document the local telecommunication infrastructure, coverage and service experiences and issues. In particular, mobile coverage was raised consistently.

Figure (1)

EXTENT OF SHIRE COMPARED TO METROPOLITAN SYDNEY

Actual Hawkesbury City area

Superimposed Hawkesbury City area over metropolitan area

With the above in mind, Council nominates the following locations in the Hawkesbury LGA as mobile coverage black spots that are worthy of inclusion on the National black spot list, to be addressed in the two funding streams of the MCP. Further information can be supplied to assist the Australian Government as required.

All these locations area black spots on major transport routes, in small communities, in areas prone to bushfires and flooding and in locations that higher demand for mobile telephony in seasonal/ event periods.

- **St Albans and the MacDonald Valley, Hawkesbury LGA**
    accessed via Wisemans Ferry Road and Settlers Arms Road

- **Colo and Colo Heights (to Putty), Hawkesbury LGA**
    accessed via Colo-Putty Road

- **Kurrajong, Kurrajong Height, Bilpin, Berambing (to Mt Tomah), Hawkesbury LGA**
    accessed via Bells Line of Road

- **Yarramundi and Hawkesbury Heights, Hawkesbury LGA**
    accessed via Hawkesbury Road

Council is not in a position to comments on the infrastructure delivery models that might be considered with MNOs. The models selected by the Australian Government, must consider the community benefits delivered to local communities to ensure the objectives of the programme are meet.

(c) $20million Mobile Black Spot Project – seasonal Black Spots

The Hawkesbury LGA on the edge of Sydney and on the door step of the Blue Mountains 'tourism area', and attracts domestic and international visitors to it in its own right for day trips and longer stays. The locations listed as black spots in (b) above all attract visitors on a weekly basis, but particularly around known National holiday timeslots like Easter, Christmas-New Year and long weekends and for special events. A number of events and activities like motor bike riding, bush bike riding, bush walking, horse riding and off road car events are based around the villages/ smaller communities scattered through the Hawkesbury LGA.

Mobile coverage is poor and non-existent in the St Albans-MacDonald Valley location and needs to be addressed to meet demand during peak seasonal periods, but to also provide a level of service to the community and assist with natural disaster and emergency situations that are also common in the smaller communities, nestled amongst the river and bushland. The MacDonald Valley Association Inc has made a submission to the MCP Discussion Paper and the Department of Communications is referred to that for justification.

Mobile coverage is poor and non-existent in the other three locations too and needs to be addressed to meet demand during peak seasonal periods and for weekly demands generated by visitors, which is eluded to in 'seasonal demands'. These locations are all based on main transport routes for the Hawkesbury area and are some of the 'best roads' for motorcycle and car trips (ie. experience straights, curves, hills, flats, scenery and buy local produce). As a result weekly and seasonal travellers visit the Hawkesbury area on these roads. It's essential that mobile coverage is improved along these main thorough fares and their associated villages/ small communities, so business can be conducted and a level of safety can be provided for potential emergency situations – floods, bushfires and accidents. It is unlikely that the average Sydney resident that enjoys the latest mobile coverage, phones and services at their place of residence and workplaces, would comprehend the poor and lack of mobile coverage in the Hawkesbury LGA prior to or on arrival in the area. They would expect to rely on mobile coverage to communicate when travelling.

Council requests that the nominated mobile coverage black spot locations in the Hawkesbury listed in (b) above also be considered under this funding stream of the MCP. Further information can be supplied to assist the Australian Government as required.

Council is not in a position to comments on the infrastructure delivery models that might be considered with MNOs. The models selected by the Australian Government, must consider the community benefits delivered to local communities to ensure the objectives of the programme are meet.

(d)   Proposed Assessment Criteria

If Hawkesbury Council can assist the Australian Government with local knowledge of the Hawkesbury LGA and on telecommunications coverage and service issues in any assessment of the area. Council has links to its community to ensure community voices in the black spot locations are consulted in identify the best solutions to improve and provide an acceptable level of mobile coverage.

(e)   Utilising the NBN fixed wireless network

The supply of the National Broadband Network is currently being rolled out in the urban locations of the Hawkesbury LGA, in the forms of fibre to the premise and fibre to the node (street). NBNCo is yet to comment on the continuance of fibre to premise/ node in the rest of the area, which is noted to be all the rural, remote and natural lands where mobile telephony is poor or non-existent. NBNCo is yet to comment on if the use of fixed wireless network will be used in the Hawkesbury LGA.

If the NBN fixed wireless network is to be a feature of the NBN build in the Hawkesbury LGA, then there may be opportunity for NBNCo to play a role in the MCP. Not with standing this, NBNCo as telecommunications infrastructure owner should be involved in the MCP. Is there scope in the MCP to consider mobile coverage supplied via a broadband solution?

It is noted that the NBN build is also about providing digital telephony for land lines and Telstra has the option to disconnect current copper telephony within 18 months of NBN being supplied to an area.

Hawkesbury Council encourages the Australian Government to support the MCP and to move quickly to establish the National mobile coverage black spot list and commence funding to address inadequate mobile telephone services in regional Australia. The four black spots in the Hawkesbury LGA are worthy of listing under the MCP criteria

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