

# 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

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Date: 19<sup>th</sup> Feb 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](mailto: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.

## **Introduction:**

The Government is to be commended for taking this important initiative to remediate mobile phone coverage across the 75% of Australian landmass that is currently not serviced. It is not clear how far this \$100m will go towards improving coverage, but it seems likely that significant areas will still remain out of service when the proposed program concludes. I implore the Government to consider this as the first stage of an ongoing process to extend coverage across the Australian landmass. Mobile phone coverage is now a basic service, and people such as myself who reside outside the mobile network know only too well how 2<sup>nd</sup> class we have become in such a short space of time simply because we cannot easily participate in activities made possible by the very recent advances in technology that 99% of the population take for granted. The problem is exacerbated by the fact that many people without mobile phone coverage also have sub-standard internet service – in my case a satellite network which appears to be already beyond capacity and with no broadband or alternative service available should the existing system fail. The speed with which mobile phone coverage has become as essential a service as clean water or electricity in our modern society was surprisingly fast. For me the realisation came approximately 12 months ago when the emergency services sent out a global text message in my district warning residents of the imminent threat of bushfires and asking us to consider early evacuation – I got the text 7 days later when I next visited town! The key point is that mobile phone services are critically important to our modern society, and every resident has a right to that basic service. I hope a follow-up programme is developed after the current budget is exhausted.

The following submission has 2 objectives. First, to suggest that my local area, Middle Arm (north of Goulburn, NSW) be considered as a priority area for improved coverage. Second, to suggest that an additional criterion for assessing coverage benefit be the number of registered businesses located within the new mobile footprint (i.e in answer to question 15).

## **Middle Arm for consideration as a priority area:**

Prior to the previous federal election I contacted the then candidate for Hume, Angus Taylor, to raise with him the issue of poor coverage in my area. For the reasons described above, our poor mobile phone coverage has frustrated me, particularly given I reside only 100 km from the national Capital and only 25 km from the Hume Highway – a road linking our national Capital with Australia's two largest cities. There are a number of reasons my area should be considered a priority under the proposed program:

- i. Coverage is currently very poor.
- ii. There are an ever-increasing number of residents that would benefit from the improved service.
- iii. There are a number of key roads that would be covered within our region, most significantly, the Taralga Rd to the North of Goulburn. This is not only a major access for the residents of the Taralga village, but is also the main road linking Goulburn with Bathurst and the Central Tablelands.
- iv. A facility already exists that could be upgraded to accommodate a mobile phone base station. The facility is a tower which I believe to be associated with the railway communications network, located approximately 20km to

the north of Goulburn, east of the Middle Arm Rd and west of the Rhyanna Rd.

- v. The Middle Arm area lies between the Taralga and Crookwell Roads and so a new base station would potentially be of benefit to residents, businesses and motorists approaching both villages. The Crookwell Rd is of course a key road linking Goulburn with Cowra and the Central West.

### **Inclusion of businesses as a criterion for assessing benefit (Question 15)**

I agree that the proposed criteria for assessing the benefit of potential new coverage are appropriate. They are:

- Number of premises located within the new mobile coverage footprint
- The length of highways and arterial roads, and
- The number of rooms offered by accommodation providers

However, I believe a fourth should be added:

- The number of registered business located within the new mobile coverage footprint

There are several reasons I believe this to be important.

- i. Businesses often have particular needs and higher requirements of telecommunication networks than individuals for personal use. For example in regional areas, agricultural businesses might rely on mobile phone coverage to drive GPS-guidance machinery or remote monitoring technologies
- ii. Better serviced businesses often have spin-off benefits to the broader community, such as increased employment. Therefore special consideration is warranted
- iii. Regional areas stand to be disadvantaged if population is valued but not business activity. For example, a husband and wife might run a 1000ha farm business which happens to exist in a mobile coverage blackspot. Based on the existing criteria, there is only 1 premises on that 1000ha, and one would typically expect only very quiet roads as there is not the population base to warrant high quality infrastructure. The current criteria fail to acknowledge the telecommunication needs of such businesses trying to compete in a global market, the broader economic benefits a more efficient farm business might bring to the community, and the improved natural resource base that could be expected by agricultural land that is managed by a more competitive and profitable business.
- iv. Government records, such as those held by ASIC or the ATO, could readily provide information on the registered address of business entities.

Should number of businesses be included as a criterion as proposed above, I believe it should apply to the full budget allocation similar to the number of premises. This is in contrast to the criterion of 'the number of rooms offered by accommodation providers' which is only applicable to the \$20m component.

It should be acknowledged that an inherent flaw exists in all the criteria assessing benefit, a flaw that the proposed new criterion still only partially addresses. The flaw is that the criteria are only assessing current need – number of people currently living

there, current importance of roads there, and potentially, number of businesses currently operating there. It must be recognised that inadequate services, such as telecommunications services, are a key reason why people don't live there or drive there or operate businesses there. Services need to be provided before useage can be gauged. For telecommunication providers, they cannot expect a market to exist before the service is provided. This is the approach that has been taken to date which explains why so many people are currently so disadvantaged. Given the rapid evolution of telecommunication services, a continuation of the same approach will only see good citizens more disadvantaged then they currently are. For this reason, I am a strong advocate for this program to be extended to ensure 100% of the Australian landmass has mobile phone coverage.