

# 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:	Isolated Children's Parents' Association of NSW Inc (ICPA-NSW)
Phone:	[REDACTED]
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Website (if applicable):	<a href="http://www.icpa.com.au">www.icpa.com.au</a>
Date:	27 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](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.

**Submission to the  
Department of Communications**

# **Mobile Coverage Programme**

**from the**

**Isolated Children's Parents' Association  
of NSW Inc**

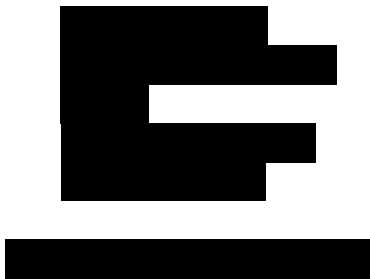


**February 2014**

Prepared by



on behalf of the NSW Council  
of the Isolated Children's Parents' Association



The Isolated Children's Parents' Association of NSW Incorporated (ICPA-NSW) is a volunteer parent group that lobbies for equality of access to education for all geographically isolated students.

It encompasses the education of children from early childhood through to tertiary. Member families of the Association reside in rural and remote NSW and all share a common goal of access to education for their children and the provision of services required to achieve this.

ICPA-NSW believes that all students, irrespective of where they live, should have the opportunity to receive the education they require to participate to their full potential in the social, economic, political and cultural life of the community.

To this end, the provision of effective communications in regional, rural and remote areas is crucial to enable students to access an equitable education. Education and its provision underpin the functioning of rural and remote towns and communities. Access to appropriate education means that families move to, or remain in, these areas with the intention of contributing to the development and prosperity of that community. Inadequate or non-existent mobile coverage seriously disadvantages rural schools and their students, and consequently the entire community.

The majority of members of ICPA-NSW rely on wireless or satellite internet as do many of the schools which their children attend, and for many members and schools mobile phone coverage is non-existent or very inadequate.

ICPA-NSW welcomes the Mobile Coverage Programme and the funding allocated to improve coverage and competition.

## **Prioritising the Locations of Towers**

In view of the fact that there is a limited amount of funding available, it is desirable that the most critical areas are given priority when consideration is given to spending funds.

Given the vital role that schools play in rural and remote areas, it is essential that those areas that have schools with inadequate or non-existent mobile coverage are prioritised.

Mobile phone service availability to school staff and students is not a convenience but an essential safety issue.

For example, the isolation of Clare Public School in the Balranald area creates difficulties when visiting or relieving teachers travel great distances to the school without phone coverage on remote roads. In the event of an emergency, communication must be via landline or through a UHF radio base in the teacher's residence. The school is the emergency evacuation point in the event of bushfires and other natural disasters, and holds the Royal Flying Doctor medical chest and a defibrillator for medical emergencies.

The Tallimba Public School has no mobile phone coverage. Phones at the school are all of the cordless type, so if a power outage occurs, there is no alternative phone access.

ICPA-NSW has compiled an on-going list of schools attended by members' children, where mobile coverage is not available. This list includes the following locations:

Clare Public School

Tallimba Public School

Goolma Public School

Wollar Public School

Hargraves Public School

North Star Public School

Yetman Public School

Bonshaw Public School

Yanco Agricultural High School

Naradhan Public School

<p><b>Recommendation: Those areas where rural and remote schools are located, which do not currently receive mobile phone coverage, be listed as priority areas for the expansion of mobile coverage.</b></p>
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**15. Do the proposed assessment criteria achieve the right balance to deliver the best value for money outcomes?**

**16. Should the proposed assessment criteria be weighted?**

ICPA-NSW is very conscious of the cost of education to all sectors of the community and of the value of the return to a community when appropriate education is provided to students. In order for regional, rural and remote communities to grow and prosper, it is essential to deliver education to these students. Investment in communications infrastructure is vital to ensure that equitable education opportunities are available, at a time when delivery depends heavily on technology in the classroom. In some cases, the hardware available for students in classrooms, such as computers and video conferencing equipment, cannot be used because the bandwidth is not adequate. When administration staff uses the internet, multiple computers in the classroom cannot access the internet.

Simply measuring the value for money of a base station by counting the square kilometres covered, or the number of premises covered, may not be a true indication of the worth of providing communications to a particular community.

Schools are hubs of transport and activity. There is the twice daily flow of cars and school buses delivering students to and from the school. There are the schoolteachers, other employees and visitors travelling to and from the school each day. There are after school hours sports, drama, excursion pick-ups and other extra curricula activities that require co-ordination between staff, parents and children. Rural schools are at the heart of their communities, and many other community meetings and activities may occur at these schools as well. ICPA-NSW strongly recommends that the assessment criteria be weighted heavily towards including schools in mobile footprints. Schools are much more significant than almost all other types of premises or facilities in determining the value of mobile connectivity.

If good teachers are to be attracted and retained in rural schools, if safety and security of staff and students is a priority, if schools are to remain a focus of small communities, so that these communities remain vital and productive elements of the state, then these areas should be prioritised for the mobile coverage programme. Future outcomes of good educational provision will provide very real returns in regard to value for money to regional, rural and remote communities.

<p><b>Recommendation: That assessment criteria should prioritise those areas where schools without mobile coverage are located, keeping in mind the future of regional prosperity and development.</b></p>
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### **Sharing of Infrastructure by Multiple Providers**

Accessing reliable mobile coverage is a real issue in the bush, and when it is available there is frequently no choice in the provider. Plans are often expensive and restrictive.

Sharing of infrastructure by multiple providers suggests that cost savings could be made and common sense would prevail. Encouraging co-operation between mobile network operators (MNOs) and the NBN may lead to more base stations provided within the constraints of the funding, thus better value for money. Facilitation at early stages of the process could mean co-location and share-build arrangements that offer significantly lower costs to provide infrastructure, and may mean that multiple MNOs can offer more competition to benefit consumers. It is also essential that co-operation occurs between MNOs and local stakeholders at each proposed site, so that these stakeholders have the opportunity to be able to contribute if appropriate, thus ensuring the maximum funding.

Sufficient publicity should occur in regard to the compilation of the list of locations that require mobile coverage under the programme, so that as much opportunity as possible is given to ensure that it is a comprehensive list

**Recommendation: That new and existing infrastructure be shared by multiple providers to ensure optimum use of the available funding and provide competition to consumers resulting in wider and more affordable mobile coverage.**