

# 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:	Warwick L Bennett
Name of organisation:	Mid-Western Regional Council
Phone:	[REDACTED]
Email:	[REDACTED]
Website (if applicable):	www.midwestern.nsw.gov.au
Date:	3-4-2014

#### 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.



*Office of the General Manager*

PO BOX 156  
MUDGEES NSW 2850

86 Market Street MUDGEES  
109 Herbert Street GULGONG  
77 Louee Street RYLSTONE

Ph: 1300 765 002 or (02) 6378 2850

Fax: (02) 6378 2815

email: [council@midwestern.nsw.gov.au](mailto:council@midwestern.nsw.gov.au)

SJ:A0370005

24 February 2014

The Manager  
Mobile Coverage Programme  
Department of Communications  
GPO Box 2154  
CANBERRA ACT 2615

**MID-WESTERN REGIONAL COUNCIL**  
**SUBMISSION TO THE MOBILE COVERAGE PROGRAMME**

Council notes the Mobile Coverage Programme Discussion Paper that was provided in December 2013 and thanks the Department for the opportunity to make a submission. The Discussion Paper examines ways in which the Department can best deliver the Government's funding commitment of \$100 million towards a programme to improve mobile coverage and competition in regional Australia.

**Increasing Competition**

While increasing and promoting competition is a worthwhile end target for the ongoing improvement of mobile telecommunications, it is recognised that there are many areas where there is no mobile service at all. This includes large areas within our own Local Government Area, even along the major transport routes that connect our towns with other regional centres and communities such as Dubbo, Orange, Bathurst and Lithgow.

For these areas, competition is a secondary consideration when compared to having actual coverage. It is Council's view that with the limited funds that are available through this programme, priority should be given to providing coverage in areas where there is none available, rather than increasing competition in areas where there is currently one or more providers.

**Proposed Assessment Criteria**

Council notes the proposed assessment criteria for bases stations or groups of base stations. It is Council's view that co-contribution should not necessarily be a determining factor in the prioritising of projects. The capacity of a community group or local government authority to make a significant contribution to the funding of a project should not take precedence over need.

Communities in regional Australia should not be denied appropriate access to mobile telecommunications and should not be denied access to Federal Government funding, on the basis that they do not have the capacity to financially contribute. There is a real danger that priority will be given to proposals that look to enhance existing services rather than provide service where it does not currently exist. Council's view is that



providing service where it does not currently exist should be the focus of any Federal Government funding.

### **Co-Location**

It is undeniably preferable for co-location of base stations to occur with the involvement of more than one mobile network operator (MNO). The current situation where there can be duplication of expensive infrastructure is inefficient and can lead to disappointing environmental outcomes. It is Council's view that it should be a requirement of Government funding that co-location can occur in the future (even if only one MNO is currently interested in the location at the time of initial funding) and that successful MNOs should agree to this.

Again, it is clear that preference should still be given to regional areas that do not currently have appropriate levels of mobile coverage. This should be the goal of any government funding aimed at improving telecommunications in regional Australia.

### **National Broadband Network**

The impact of the National Broadband Network and any changes to this program also need to be considered in the context of the fixed wireless network rollout and any benefits that can be gained by considering this within the Mobile Coverage Programme.

Further information on the NBN, the changes to original timeframes and plans for the NBN and what this all will mean for regional Australia has been requested by Council and remains of great interest to this Council and local government authorities throughout the country.

### **Delivery Options**

A number of possible delivery options are considered in the discussion paper. Delivery option 1 appears to be the one that is more likely to focus on areas that have poor, or no, mobile coverage. However, as stated previously, it is suggested that there should be a forward thinking focus to this option that requires co-location of services. This will ensure that unnecessary duplication of infrastructure is not required in the future.

On behalf of Council, thank you again for the opportunity to make a submission to the Mobile Coverage Programme. We look forward to hearing more about the implementation plan for this funding in the near future.

Yours sincerely



**WARWICK L BENNETT**  
**GENERAL MANAGER**