

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:	██████████
Name of organisation:	NSW Riders
Phone:	██████████
Email:	████████████████████
Website (if applicable):	www.nswriders.com
Date:	5/2/14

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.

Submission: Mobile Coverage Programme

SUMMARY

NSW Riders is a community of over 1,000 experienced motorcyclists that enjoy traveling throughout New South Wales and interstate. Meeting two to three times per month, we conduct mostly single-day events of between 200 and 600 kilometres, originating and concluding in Sydney. NSW Riders is an established and organised group operating for over 5 years and is structured with senior riders (or marshals) and forum administrators / moderators.

PROBLEM

Many desirable motorcycle routes across New South Wales and Australia coincide with roads not serviced by any mobile network operator (MNO). Whilst motorcyclists have minimal need for mobile telecommunication service in transit, the lack of mobile phone coverage inhibits and delays alerting the emergency services in the event of a serious road trauma.

This is a problem for road incidents of any vehicle type.

QUESTION RESPONSES

1. Appropriate minimum quality.

2. Indicators specifying minimum quality standards.

The preferred model according to NSW Riders is option 1 lending to greater value and economy of scale. Whilst having MNO's (or consortia of MNO's) bidding on individual or groups of base stations (option 2) offers the Commonwealth greater control of areas that will receive coverage under this programme, a strengthened requirement for bidders to adhere to a list of locations established by the Commonwealth may further balance to the option 1 locations.

9 - 12. Open access provisions

Since emergency triple-0 calls roam through any network, NSW Riders objective of increasing mobile coverage along popular motorcycle routes for emergency reasons is met by at least one MNO being present. However, it is believed open access and co-location provisioning somewhat future-proofs this infrastructure in terms of commercial viability and expansion, which NSW Riders supports.

15. Proposed assessment criteria balance

17. Seasonal demand assessment

NSW Riders seek further considerations / definition in regards to criterion 3(b). In considering national, state highways and arterial roads, factors such as traffic flow, crash statistics and proximity to other telephony services (ie, pay phones) and emergency services should be included. Such criteria would ensure due consideration for roads, which themselves have varying scales of need for mobile coverage. On length of road coverage alone, roads with very different attributes but the same length through a proposed coverage area would not receive due consideration

For instance, the snowfields surrounding Jindabyne could be considered for its seasonality (the annual snow season from June to October) in square kilometres as per criterion 2-New Coverage. The Alpine Way and Snowy Mountain Highway connect these snowfields, host a motorcycle event in early November attracting over 3,000 riders and many others throughout the summer months. Any bids for base stations on such roads should be able to express their value in appropriate terms.

NSW Riders suggests criterion 3(c) be waived where exceptional safety gains would be achieved for a base station site defined by our proposed extended criteria within 3(b). Bidders would not be required to demonstrate room number benefits for a base station location proposed for predominant road user safety and benefit, quantifiable through publicly available crash, incident and fatality statistics.

The same measures should also apply to criterion 5(c), where the Commonwealth can determine value for money in crash zones receiving new coverage, leading to lives saved.

State government contribution

NSW Riders foresees an opportunity to lobby the New South Wales government to contribute submissions and funding towards any proposed base stations within the \$20 million component, for the purpose of road safety.