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:	Anna Sande
Name of organisation:	N/A
Phone:	
Email:	
Website (if applicable):	
Date:	29.4.14
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? No \Box	
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.



BEEAC

16 February 2014

The Manager

Mobile Coverage Program

Department of Communications

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Canberra ACT 2615

cc

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Communications Ombudsman,

Dear Manager

Sande - Submission to Mobile Coverage Programme 2014

I write from a little town called Beeac, situated between Colac and Ballarat in Victoria, approximately 170 km from Melbourne. Beeac is within line of site of Mt Gellibrand which hosts a communications tower. However communication within Beeac and its

surrounds is often touch and go. Last week, as if on cue, as the smoke arrived, so too reception cut out for most of the day. I had no means of following recommendations and staying aware of the proximity or direction of fires. I could not access the state emergency information site. I could not contact others.

My MNO is Telstra. Personally, for financial reasons, I rely solely on a mobile device (iphone 4S) for all my communication needs: general telephony and online access.

Adequate coverage is crucial to my ability to manage my activities at this location. I am not alone in having this need. I am also aware that there are many elderly people in this town for whom knowledge of a trustworthy means of communication is essential, essential for their peace of mind, safety and security.

As sedentary employment plummets, people need to be supported by flexible means of communication in order to explore employment potential beyond city limits. The communication age has been touted as offering just such flexible benefits. If, as the Minister for Communications, Mr Turnbull seems to suggest, there is some plan afoot to create jobs, ('we talk about jobs being lost but we forget about jobs being created' – see source below), then a reliable means of communication is a fundamental tool in that process. If this tool is not equitably available then what is being created, is not jobs, but widened inequity and in fact regional handicap.

The Minister's department website indicates the following but offers no timeframe:

The Mobile Coverage Programme has two components. \$80 million will be provided under the Mobile Network Expansion Project to improve mobile phone coverage along major transport routes, in small communities and in locations prone to experiencing natural disasters. An additional \$20 million will be provided under the Mobile Black Spots Project to address unique mobile coverage problems.

http://www.communications.gov.au/mobile_services/mobile_coverage_programme

I would like to know if, at the time of my writing, 16 Feb 2014, these monies have yet been either 'prioritized' or allocated and if so to which locations.

From listening to the Minister, (http://www.abc.net.au/tv/qanda/txt/s3934246.htm) I understand that the whole of Australia is dependent on a temporary satellite arrangement. A situation which he describes as 'absolutely appalling' and about which he has recently offered the following blame, rather than a solution:

'The Government (Labor) said that their interim satellite solution covered or passed sometimes 200,000 premises, sometimes 250,000 premises. What they didn't say was that they had only bought enough capacity to cover 48,000 premises. So they created the expectation that there was the capacity to deliver a much larger number of people the service when, in fact, there was not.'

To add to this scenario the Minister observes that a limited number of MNOs are selling

'uncapped schemes with no data allowance as though they were selling, you know, products in the city, services in the city. As a result of that, the satellite service to the 48,000 people who have got it has become overcrowded and in and many people - most people on that are getting, a lot of the time, a very poor service.'

I have kept a document issued during the currency of the Liberal government in 2007, written by Gary Nairn the then Special Minister for State, it is entitled: 'Your Telecommunications Safeguards'. The last 'chapter' of this document is titled: 'Better Broadband and Mobile Coverage' – this spells out, 7 years ago, just how crucial the role of communication is in a country with the dimensions of Australia, crucial to commerce of course, but also crucial to safety and community. Although the present government has not been in office for most of that time one would hope that as paid representatives of some electorate and as Shadow Ministers they would have been keeping up with the planning required to keep faith with the mandate and plan they had been developing for a decade prior to December 2007.

If, as the Minister revealed on 10/2/14 the then government had 'only bought enough capacity to cover 48,000 premises' why did he not, even in opposition bring this to the attention of Australians. It's pretty lame to state that: 'I'm trying to find some solutions to it at the moment. It is not difficult, as with most messes the Labor Party has made, the only solution is spending even more money and we're working on that now ...'

If as he also said (10/2/14): 'in 2015 the long-term satellites will be here,' **please let us know, now, what capacity they will offer and how connection will be allocated**. To say 'It is a complete shambles' after approaching six months in office does not inspire confidence nor offer any evidence of forethought or keeping up with the issue.

Are there not interim measures possible to support communities as well as 'transport routes'? For example I understand the beam of the tower that is presently directed toward the highway near Beeac is clearly prioritizing 'major transport routes' while neglecting 'small communities and ... locations prone to experiencing natural disasters'. Is this inequitable distribution of service one which might possibly be addressed by broadening the coverage *from that tower*, without resorting to increased infrastructure and could this not be repeated around the country, if indeed it is a technical possibility.

Would the Department please disclose when the outcome of the 'Discussion paper' is likely to become a reality. What is the timeframe? Surely it is more feasible to expect people to be patient if they have some idea that a plan is in action and a timeframe communicated. Without that it is clear that certain parts of Australia are being treated as second rate citizens despite paying their dues. Without such information this situation and future scenarios are certainly 'appalling'.

Regarding the 'submission' process: there are three scenarios offered; why does the government, surely in a better situation to appreciate the ramifications of each option, not make a decision itself; it appears nothing short of a delaying/defusing tactic to have all and sundry contribute their variously informed thoughts about these options – presumably at some cost all round. The government is in the best position to judge – let it judge and be fair, decisive and timely in addressing this problem in regional areas.

It would seem reasonable to suppose that government as the repository of taxes and information regarding communications infrastructure bears the sole responsibility to ensure connectivity between all its constituents. Why are small communities being required to contribute – 'in cash or in-kind' – surely this sets up a situation where those ready/able to offer the most by way of contribution will be prioritized ahead of those unable to offer as much. This seems a very unfair and inequitable scenario.

I believe this discussion/submission process is a means of delaying action on this problem and of setting one community against another, along with various shades of MNO. For this reason I believe this process is flawed – I would prefer to see the government take a comprehensive approach which embraced the communications needs of all Australians, not just those with the loudest voices or deepest pockets, and make a decision, soundly based, wwhich it will stand and defend.

Government has a commitment to provide means of communication as one of its central roles. Whatever happened to the \$2bn Communications Fund the goal of which was 'to provide a source of income for regional telecommunications services to keep pace with technology', (final page of the Liberal 'Your Telecommunications Safeguards' brochure).

Judging from the 'discussion paper' it would appear that unless a location, in extreme need, has a hugely healthy tourist clientele they will not qualify for 'blackspot' assistance. This further skews the allocation of funds and suggests that certain areas have already been prioritized.

Regarding integration with the NBN this is fundamental – however a mosaic of share-build arrangements between NBN and MNOs sounds, to this writer, like a recipe for buck-passing, delay, duplication and obfuscation.

Communication is a right not a privilege – the incumbent government has the responsibility to provide means of communication adequately and equitably, and the opposition government has the responsibility to hold the incumbent government to this requirement.
Yours truly
Anna Sande