

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: Gary Tuffin, Chief Executive Officer

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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

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.



Mobile Coverage Programme Discussion Paper Submission

Thank you for the opportunity to make a submission to the Department of Communications in relation to the Mobile Coverage Programme Discussion Paper.

Our submission is made in light of your stated aim to *"improve mobile coverage along major transport routes, in small communities and in areas that are prone to experiencing natural disasters"* through the Mobile Network Expansion Program.

The Shire of Chittering's southern boundary is located 56kms north of Perth, with an area covering 1,220km² and appears to tick all three boxes.

- ☒ Great Northern Highway, a major transport route, dissects the main townsite of Bindoon.
- ☒ The Shire is home to several townsites and localities which in effect form their own small communities – Muchea, Lower Chittering, Upper Chittering, Bindoon, Mooliabeenee and Wannamal.
- ☒ The Shire has been assessed by Department of Fire and Emergency Services (DFES) as an extreme bushfire risk area.

A recent Home Telecommunications Survey undertaken by the Shire of Chittering alerted us to the following issues;

- 16% of respondents have no mobile coverage at home.
- 49% of respondents have mobile coverage but it is poor / limited / intermittent.
- 65% of respondents are not satisfied with their mobile access.
- 6% of respondents have no internet access at home.
- 56% of respondents with internet access at home are not satisfied with the quality of that access.
- 48% of respondents have no / limited / poor / intermittent digital TV coverage.

With reference to the questions raised in the discussion paper;

1. Minimum quality standard, whilst we are not qualified to answer this question, we would be most pleased to receive any improvements that would result in a reliable mobile network and data communication service.
2. Minimum quality standard indicators, again we are not qualified to answer this question, however, a very simple measure for us would be to have a mobile phone and data service that works consistently (all year round) throughout our Shire.
3. The issues regarding delivery option 2 are broadly covered under "Pros and Cons". One observation might be that the ongoing complexity of this option could result in a 'fractured network' of towers, unless open access is provided to all MNOs.



4. We as a local government are not experienced in the intricacies of allowing network infrastructure providers and mobile network operators to compete, therefore we do not feel it's appropriate to provide a response to this question.
5. Yes, NBN Co base stations should be able to be considered in order to strengthen the networking of all base stations, existing and proposed. Shared use of base stations may lead to the relocation of existing stations and in the interests of cost efficiency and environmental care this should be encouraged.
6. With regards to joint bids, we believe the sharing of resources should be encouraged or at least provided as an option to bidders. However, we assume any new joint venture (no proven history) bids would receive a much higher level of scrutiny to ensure their long term sustainability.
7. We as a local government are not familiar with normal practices within the telecommunications industry. With regards to your question, if contracting a third party to provide backhaul is something that specialist network infrastructure providers are already experienced in we don't feel that it would be an issue.
8. From our layman's point of view we feel that Option 3b looks to be the best outcome for Australia's regional residents as it appears to be the option that will provide the most coverage through a greater number of providers.
9. Appropriate base station specifications, unknown.
10. One would hope that the proposed open access provisions would be sufficient to encourage other mobile network operators to utilise the base stations, given the capital cost and approval process involved in establishing them we believe this should be highlighted as a key priority for a positive outcome.
11. It may be the case that a requirement for pre-commitment would defeat the purpose of allowing infrastructure providers and MNOs to focus and invest solely on their respective specialised fields.
12. Estimated additional cost of requiring new base stations to meet open access requirements, unknown.
13. The open access provisions should be applicable to all base stations funded under both the \$20M and \$80M components to ensure continuity, the best possible coverage and more competition.
14. Appropriate models / benchmarks for access establishment and backhaul pricing, unknown.
15. The proposed assessment criteria appear to be extensive enough from a layman's point of view.
16. Whilst it is difficult to provide appropriate weighting, we would like to provide the following comments for your consideration;
 - Priority Location – if the proposed base station is not in a priority location it should not be considered.
 - New Coverage – we believe that the new coverage area (particularly handheld) should rate very highly given that the most common complaint we receive is poor coverage. This would also appear to be one of the priority outcomes from Mobile Coverage Programme.

- Benefit Extent – benefit is of course a consideration but if weighted too heavily hilly and / or remote areas which require more towers to service less area / number of premises will be disadvantaged. Perhaps another criterion could be introduced in relation to regional black spot areas that do not necessarily have a large number of premises. The assessment criteria could provide a heavier weighting to this issue to encourage proposals that address these black spot areas. Given these type areas appear to be viewed less favourably by MNOs.
 - Co-contributions – whilst an important consideration, the size of a co-contribution may not necessarily translate to the most beneficial proposal. For example a 75 (Government) / 25 (MNO) co-contribution may achieve the programmes desire better than a 50/50 contribution.
 - Value for Money – rather than apply a percentage we would prefer to see a non-weighted method used, as functional considerations such as capacity, quality, coverage and adaptability are seen to be crucial to the outcome of the programme. Once the bidders have been ranked against the assessment criteria, the evaluation process would allow value judgement as to the cost affordability, qualitative ranking and risk of each bidder, in order to determine the bid which is most advantageous to Government. Our concern being, that if cost is weighted too heavily, hilly and / or remote areas which may require more expensive solutions to service less area / number of premises may be disadvantaged
 - Open Access – we believe this is one of the more important aspects of the program in achieving greater competition, and therefore should be weighted accordingly.
 - MNO Commitment – encouraging commitment from MNOs will assist in the success of the program in the larger more commercially viable areas. However, we are not sure how realistic it is to expect MNOs to compete to supply their services in area where the commercial viability is limited. Most smaller region areas would be most grateful to receive a service from any MNO that provides good coverage and a reliable service.
17. As well as accommodation providers the number of other visitor attractions within the area could be considered, as theme parks / restaurants / etc could also be an indicator of seasonal pressures. Discussions with local Visitor Centres can also give a feel of peak times in the area.
 18. As Fixed Wireless Network has not yet been rolled out in our area, it is difficult to provide a response to this question.
 19. In providing an unqualified comment, we would suggest that a similar approach be taken to this programme, and provide greater open access to its relevant and suitable infrastructure, if this does not already occur.
 20. Additional considerations for NBN Co, unknown.
 21. Role of Australian Mobile Telecommunications Association, unknown.



22. The Mobile Coverage Programme can best complement the NBN fixed wireless service by focussing on those areas which are not covered under the fixed wireless service in the short-term.

Referring to the recent examples of open access requirements as advised in the Discussion Paper

NZ

The page was last updated on 7 December 2011. One statement that was very interesting *"Open access requirements: Any network infrastructure that is funded through the Rural Broadband Initiative must be open access, and provide for a range of services being provided from a range of retail providers."*

UK

"Making it easier for the communications and telecoms industries to grow, while protecting the interests of citizens". The page was published in January 2012, consultation closed in February 2012 and the page still states 'feedback being analysed' and just shows their process, no outcomes.

"Broadband [and mobile coverage] is no longer a "nice to have" – it is an essential part of everyday living – affecting access to services, healthcare, education, housing and social inclusion to name but a few. Broadband is now a UTILITY – if you haven't got it, you are already at a disadvantage" <http://www.ruralbroadband.com>

Should you require any additional information in relation to this submission please do not hesitate to contact [REDACTED]