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:	JEREMY HUBBLE
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Date:	26 FEBRUARY 2014

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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.

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27 February 2014

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

mobilecoverage@communications.gov.au

Dear Sir,

Submission – Mobile Coverage Programme Discussion Paper

Thank you for the opportunity to respond to the Mobile Coverage Programme Discussion Paper issued December 2013. Detailed below is the submission in respect of the various components of the Discussion Paper.

$80m Mobile Network Expansion Project

(a) Specific questions

#	Question	Shire of Manjimup Comment
Delivery option 1 – Single MNO		
1	Appropriate minimum standards?	Yes however those areas currently without any mobile service would most likely be satisfied with 3G.
2	Indicators minimum quality standards?	Signal strength is one issue, range and coverage is the other. It is understood that signal transmitter strength and orientation can be adjusted to maximise coverage. Tailored coverage maps should also be required with minimum range standards.
Delivery option 2 – Multiple MNO's		
3	Additional issues?	Yes
Delivery option 3 – Network infrastructure provider to co-ordinate		
4	Could options 3 (a) and (b) be delivered in conjunction with options 1 or 2?	No. This would effectively limit the program to delivery of service to larger regional areas where there is greater demand for service options. Areas currently without any service will be satisfied with limited options (rather than current none!) and would most likely happily subscribe to that MNO providing a service.
5	Should bidders be able to specify use of NBN base stations?	Yes. Shared infrastructure is the way to go in the regions primarily as the cost of providing infrastructure

		and necessary support services (such as power) can be an obstacle.
6	Should joint bids be permitted / encouraged?	Yes.
7	Should specialist network infrastructure providers provide backhaul?	No. The requirement should be levied on the first MNO using the infrastructure.
8	Is option 3(b) suitable for regional mobile market?	Doubtful. Would make sense through economic access to core infrastructure however question if wholesale operators willing or interested in providing this in marginal or low volume locations.

(b) General comments

Firstly, the proposed funding allocation of $80m is grossly inadequate (based on approx cost of $1m+ per site) and will likely result in only a handful of sites being achieved in each State.

The Shire of Manjimup favours delivery option 2 as it is considered sites nominated are more likely to reflect regional needs rather than sites that are economically attractive for the successful tenderer.

As the cost of infrastructure can be high in regional and remote areas, it is essential that shared access to the infrastructure (including support infrastructure) is a condition of tender. Shared access should not be limited to mobile phone and should extend to emergency management needs. There also needs to be a simple dispute mechanism should the lead MNO unreasonably delay or refuse application.

(c) Proposed locations in the Shire of Manjimup (in order of priority)

Area	***Locality***	***Primary Road***	***Specific area***	***Comment***
West Manjimup	*Glenoran*	*Graphite Road*	*Near Jones Road intersection*	*Residents, travel route, forest management (fire), hikers / bikers*
East Manjimup	*Dingup / Upper Warren / Lake Muir*	*Muir Highway*	*Near Nyamup*	*Residents, travel route, forest management (fire)*
East Manjimup	*Perup / Mordalup*	*Perup Road*	*Near Yerramin tower*	*Residents, travel route, forest management (fire)*

$20m Mobile Black Spots Project

(a) Specific questions

#	Question	Shire of Manjimup Comment
n/a		

(b) General comments

Firstly, the proposed funding allocation of $20m is grossly inadequate (based on approx cost of $1m+ per site) and will likely result in only a couple of sites being achieved in each State.

The requirement for EOI's to originate from local governments is supported, however this should be extended to entities (such as Regional Alliances or Development Commissions or RDA's) acting on behalf of groups of local governments.

The requirement for EOI to include a commitment to provide a co-contribution is supported however it seems unfair to impose such condition on this category only whilst the more economically viable $80m projects require no such co-contribution. Also, is there any reason why no contribution is required from the relevant State Governments.

(c) Proposed locations in the Shire of Manjimup (in order of priority)

Area	*Locality*	*Primary Road*	*Specific area*	*Comment*
North Walpole	*North Walpole*	*North Walpole Road*	*Mt Frankland*	*Residents, tourists, forest management (fire), hikers / bikers*
West Pemberton	*Beedelup / Channybearup*	*Vasse Highway*	*Near Karri Valley resort*	*Residents, travel route, tourists and forest management (fire)*
Coastal	*Windy Harbour*	*Windy Harbour Road*	*Near lighthouse*	*Residents, tourists, fishermen, forest management (fire)*
West Manjimup	*Deanmill / Jardee*	*Seven Day Road*	*Near Bottomley Road intersection*	*Residents, horticulture, tourists, forest management (fire)*

Open access and co-location provisions

(a) Specific questions

#	Question	Shire of Manjimup Comment
9	Specifications for base stations to accommodate at least two other MNO's?	Agreed. Should also include compound (sufficient space to also accommodate satellite dishes), equipment shed, towers and support services such as power (sufficient power capacity to run three or more services).
10	Open access provisions sufficient to encourage other MNO's?	Yes however a mechanism to accommodate MNO's some-time after the infrastructure has been built appears to be missing. Evidence in remote locations is that there tends to be a lead MNO and gradually others wish to share infrastructure (for example, Walpole tower has expanded to 3 separate MNO's over a 15 year period).
11	Should MNO's pre-commit investment?	Difficult to achieve. Refer above.
12	Est additional cost for base stations to meet open access requirements?	Variable depending on site and existing supporting services (ie land, power, road access). Proportionally however the additional costs to accommodate three MNO's is considered only marginally greater than one.
13	Open access provision applicable to $20m Black Spot Project	Yes. Definitely (refer example given in comment Q10).

	components?	
14	Model / benchmarks for backhaul pricing reflecting public funding?	No comment.

(b) General comments

The Shire of Manjimup strongly supports the principle of open site access as outlined in the discussion paper. Support is also given to the consideration of a dispute resolution mechanism.

Consideration should also be given for a mechanism allowing emergency service transmissions from such sites (ie Fire & Rescue, SES, Ambulance, Bush Fire) subject to the structural capacity and interference. Where co-contribution is provided by a local government, access to infrastructure for normal local government functions (ie VHF radio) should be permissible subject to available capacity.

Proposed Assessment Criteria

(a) Specific questions

#	Question	Shire of Manjimup Comment
15	Criteria achieve right balance?	No. The criteria is discriminatory as it make no allowance for variations in topography or vegetation both of which have a massive influence on mobile service range.
16	Should criteria be weighted?	Yes. 2 (a) hand held coverage where no previous coverage was available should receive a higher weighting.
17	More effective means of measuring seasonal demand?	Traffic counters can provide a reliable indication of seasonal movements.

(b) General comments

The criteria as proposed is discriminatory and has no regard for the variation in coverage due to topography or vegetation. Many communities currently without mobile communication are in locations with challenging topography and/or vegetation. Some allowance should be included in the criteria to respond to this otherwise the result will be distorted.

Concern is also expressed about the method of measuring / assessing visitation levels. It is understood that ABS statistics only reflect accommodation facilities with 10 or more beds. The tourism industry in many remote communities (such as those in the Shire of Manjimup) is predominately smaller family owned and operated chalets which are not reflected the ABS data. Windy Harbour for example expands from approximately 20 people to 1,500 people at peak holiday periods and yet only one small nature based caravan park would appear on any stats).

Utilising the NBN fixed wireless network

(a) Specific questions

#	Question	Shire of Manjimup Comment

18	To what extent would the NBN fixed wireless network result in improved mobile coverage?	Little as most black spot locations are unlikely to be serviced by fibre or wireless from NBN.
19	How can NBN improve competition and choice in regional Aust?	No comment. Suggest refer question to the Australian Competition and Consumer Commission.
20	Other considerations for NBN to support regional mobile coverage?	No comment.
21	How can early engagement between NBN and MNO's be facilitated?	Require the MNO's or the network infrastructure provider to liaise with NBN prior to lodging any submission/tender.
22	How can this program complement role of NBN improving mobile coverage?	Focus the program on those area's unlikely to be serviced by NBN fibre or wireless systems.

(b) General comments

Most of the complaints received within the Shire of Manjimup about mobile services is the lack of mobile coverage. Typically the complaints also correlate with complaints about lack or poor speed of internet services. It is unlikely that the NBN fibre or wireless systems will extend to many of the areas currently without service. It is recommended therefore that the program not be distracted or overly influenced by the need to integrate with NBN network infrastructure (more so, it should be viewed as a bonus).

Please do not hesitate to contact me should you have any queries or require any additional information.

Yours sincerely,

Jeremy Hubble
Chief Executive Officer
Shire of Manjimup