

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:	Department of Further Education, Employment Science and Technology (DFEEST)
Phone:	
Email:	
Website (if applicable):	
Date:	March 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.



Ref: BRIEFC/14/218

5 March 2014

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

Email: mobilecoverage@communications.gov.au

Dear Sir

RE: DFEEST SUBMISSION TO THE MOBILE COVERAGE PROGRAMME FEBRUARY 2014

Thank you for the opportunity to provide a submission to the Department of Communication's Discussion Paper of 16 December 2013 regarding the Mobile Coverage Programme.

As you will be aware, a State Election has been called and we are currently within Caretaker period. As a result, this submission has been provided as a Departmental response. This submission has been developed in consultation with the Office of the Chief Information Officer (OCIO), Department of Premier and Cabinet, which has consulted across state emergency services agencies.

The availability of good mobile phone coverage and quality continues to remain a high priority for communities, especially those living and working within regional and remote parts of South Australia.

Attached are our comments in relation to the points raised in the Discussion Paper and local priorities for additional mobile phone coverage in South Australia.

I trust that you find our comments and input to your programme useful. Should you wish to discuss any nature of our submission further, please contact [REDACTED]

Yours sincerely

Raymond Garrand
CHIEF EXECUTIVE

Submission to the Mobile Coverage Programme Discussion Paper provided by Department of Further Education, Employment Science and Technology (DFEEST)

Programme Delivery Options

The preferred Delivery Option is that described as Option 3 – Network infrastructure provider to coordinate implementation.

This also provides greater opportunities for the provision of wireless coverage from any future Public Safety Mobile Broadband network and the construction of additional telecommunications sites that the South Australian Government Mobile Radio Network (SAGRN) may be able to use to provide additional, enhanced and/or more cost effective SAGRN services. With regard to this point, delivery option 3(a) in the discussion paper is preferred as this would provide the most open and cost effective access to any new sites. "Greenfield" base stations should also be designed and provisions made, for public safety mobile needs. The MNO should be required to consult with relevant State public safety organisations.

In order to maximise the outcomes, it is suggested that Option 3(a) be combined with Option 1 or Option 2.

A joint bid with specialist network infrastructure provider and an MNO should be permitted.

Inter-carrier roaming should also be mandated in order to encourage competition at sites funded through the programme, possibly with a "First Right of Use" provision to the lead MNO.

Assessment Criteria

DFEEST agrees with the proposed criteria, however, the additional criteria could be included:

1. Social benefit or impact of proposed new coverage
2. Innovative technology solutions for example in remote indigenous communities such as the APY Lands. Low cost, tailor made mobile base stations with satellite backhaul would allow deployment into such communities.

Local Priority Locations

DFEEST is aware that submissions are being made by the SA Local Government Association and Regional Development Australia and others which identify locations that require improved mobile coverage in South Australia. These submissions are supported in principle and DFEEST would be pleased to work with all parties to ensure optimal outcomes for the State.

Co-Funding Contributions

Due to the Caretaker arrangements, DFEEST is not in a position to commit any funding to this programme at this time.