

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: Wendy Newman, CEO

Name of organisation: Wheatbelt Development Commission

Phone:

Email:

Website (if applicable): www.wheatbelt.wa.gov.au

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.

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

To whom it may concern

MOBILE COVERAGE PROGRAMME DISCUSSION PAPER

The Wheatbelt Development Commission (WDC) provides the following feedback in response to the Department of Communications request for comment on the Mobile Coverage Programme (MCP) Discussion Paper.

WDC is a WA State Government statutory authority charged with facilitation of economic and regional development across the Wheatbelt region. We work collaboratively with government (including our 43 Wheatbelt local governments) and other regional stakeholders, to provide a coordinated approach to address economic, environmental and social issues impacting the Wheatbelt.

The highly dispersed nature of the Wheatbelt population creates unique challenges for the provision of services and requires coordinated planning. The Wheatbelt Region spans 154,862 square kilometres, and is home to approximately 75,000 people, making it the third most populous region in WA.

In relation to the Mobile Coverage Programme Discussion paper the WDC provides the following comments.

- The WDC support a State and Federal government partnership to fund a second phase of the (Regional Mobile Communications Program) RMCP, based on the successful management of the first round of RMCP in WA. WDC consider this a 'best practice' model.
- **(p.4)** The WDC support the creation of a list of sites based on:
 - ✓ representations made by citizens, organisations and elected representatives about locations that have poor coverage, or no mobile coverage;
 - ✓ advice provided by State and Territory governments; and
 - ✓ mapping, drive test and other relevant data.
- The WDC have identified 98 sites in the Wheatbelt. The information gathered to identify these sites involved extensive consultation with Wheatbelt residents, local governments, state government departments and other stakeholders to ensure accurate information and immediate priorities are identified. Major transport routes, town coverage, any neighbouring coverage, economic drivers and small locations that experience high seasonal demand (specifically those along our Wheatbelt coastline) form the prioritisation criteria.

Avon

1st Floor, 298 Fitzgerald Street
(PO Box 250)
NORTHAM WA 6401

T: (08) 9622 7222

F: (08) 9622 7406

Central East

110 Barrack Street
(PO Box 420)
MERREDIN WA 6415

T: (08) 9041 1445

F: (08) 9041 2297

Central Midlands

Foundation Centre
13 Dandaragan Street
(PO Box 240)
MOORA WA 6510

T: (08) 9651 1770

F: (08) 9651 1910

Wheatbelt South

State Government Offices
Park Street
(PO Box 258)
NARROGIN WA 6312

T: (08) 9881 5888

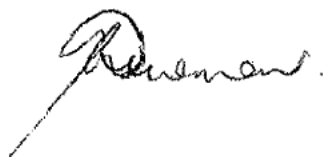
F: (08) 9881 3363

www.wheatbelt.wa.gov.au

- **(p.4)** Delivery option 1 *Single mobile network operator contracted to deliver the programme* is a proven successful model, which will ensure benefits are maximised and cater for a wider national audience. This is based on direct experience through the WDC involvement in the delivery of the RMCP. Service provider knowledge of the regions and ownership of regional infrastructure provides a clear and cost effective solution to ensure the delivery of infrastructure and services to the regions are provided at a standard comparable to metropolitan areas. Economies of scale through contracts that bundle sites across our 43 local governments will ensure the greatest coverage for cost.
- **(p.5)** Continuity of service from one location to the next needs to be assured. Current investment is limited from some service providers (Optus, Vodafone etc) in regional WA and for this reason Delivery option 2 *Order of merit from base stations proposed by multiple MNOs (Mobile Network Operators)* and **(p.6)** Delivery option 3 *Network infrastructure provider to co-ordinate implementation* would not be suitable, as 'blackspots' would largely remain in regional WA.
- Stakeholder consultation needs to occur with the initial and final site selection. Preferably a high standard base station to be provided, however, we are aware that cost effective solutions and greater regional coverage may demand exploration of various site options at one location, and base station specifications could be modified through service provider and stakeholder consultation. This maximises benefit and increases leverage for any service provider funded upgrade in the following years.
- **(p.9)** *Backhaul access and pricing*, when rolling out multiple programs, open access and co-location provisions should be encouraged. These provisions were established during the RMCP, and have taken advantage of current and proposed infrastructure (NBN/Optus), to provide future competition and improved service. Open dialogue between program providers is essential to ensure roles are not duplicated. RMCP experience also indicates that in some instances NBN infrastructure is unable to be used as a result of conflicting delivery methods.
- **(p.8)** it would be inappropriate to use the number of sites/rooms/cabins offered by accommodation providers in any area, as the assessment criteria for the \$20 million. This would place smaller communities and businesses at a disadvantage where other criteria may raise their level of priority. The WDC would also find it unlikely that this component of the \$20 million would be undersubscribed in WA as also suggested on page 8.

We would like to thank you for the opportunity to comment on the Mobile Coverage Programme Discussion paper. If you require further information please contact [REDACTED]

Yours sincerely,



WENDY NEWMAN
CHIEF EXECUTIVE OFFICER

28 February 2014