

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:	██████████
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Date:	24 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.

Wimmera Development Association

Australian Government Mobile Coverage Programme

February 2014

Background

Wimmera Development Association is located in western Victoria, and is the peak regional development organisation, servicing the Wimmera and Southern Mallee. Member Councils are West Wimmera, Hindmarsh, Yarriambiack, Northern Grampians and Horsham.

The region has been active in advocating for improved telecommunications services for our businesses and community. The new Coalition Government “Mobile Black Spot Programme” policy offers regional communities with opportunities to improve services, including significant leverage opportunities from the roll-out of the National Broadband Network (NBN) infrastructure.

Wimmera Development Association supports active collaboration between federal and state governments, mobile telecommunications businesses and communities to take full advantage of existing and new infrastructure to maximize the access and affordability of the mobile telecommunications network. This includes the co-location of services on towers, as well as the review of backhaul and transmission infrastructure to maximise competition.

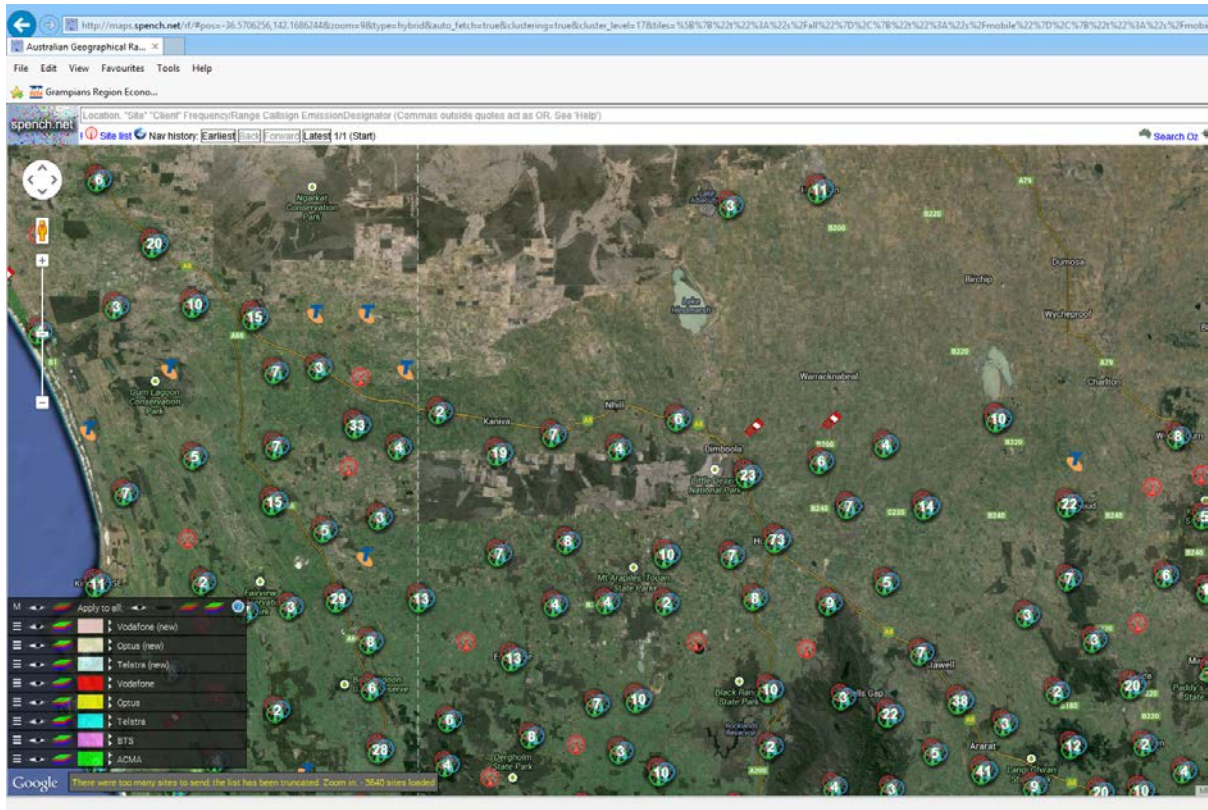
Equitable access to mobile telephone and data services is critical to the development of regional communities. Reliance on mobile telephone services to access information, maintain contact and transfer data is increasing, resulting in a growing ‘divide’ between communities that have mobile telephone/data services and those that do not.

Variability in access and signal strength is a growing issue as data use increases. The capacity of existing mobile infrastructure to service this growth is questioned, as well as the investment required to maintain the current service levels, aside from increasing services in regional areas.

Co-location of service providers and shared infrastructure is technically feasible, but commercially unattractive. This would provide a partial solution in regional areas to maximize the investment and coverage of mobile services.

The map below demonstrates the opportunity – multiple services with equivalent infrastructure in adjacent locations, due to the commercial barriers to shared infrastructure. If this investment was dispersed to provide extended coverage and access in regional Australia, with shared infrastructure, it would address some of the disadvantage

experienced by regional businesses and communities. To continue the current arrangements through the Mobile Coverage Programme is not acceptable.



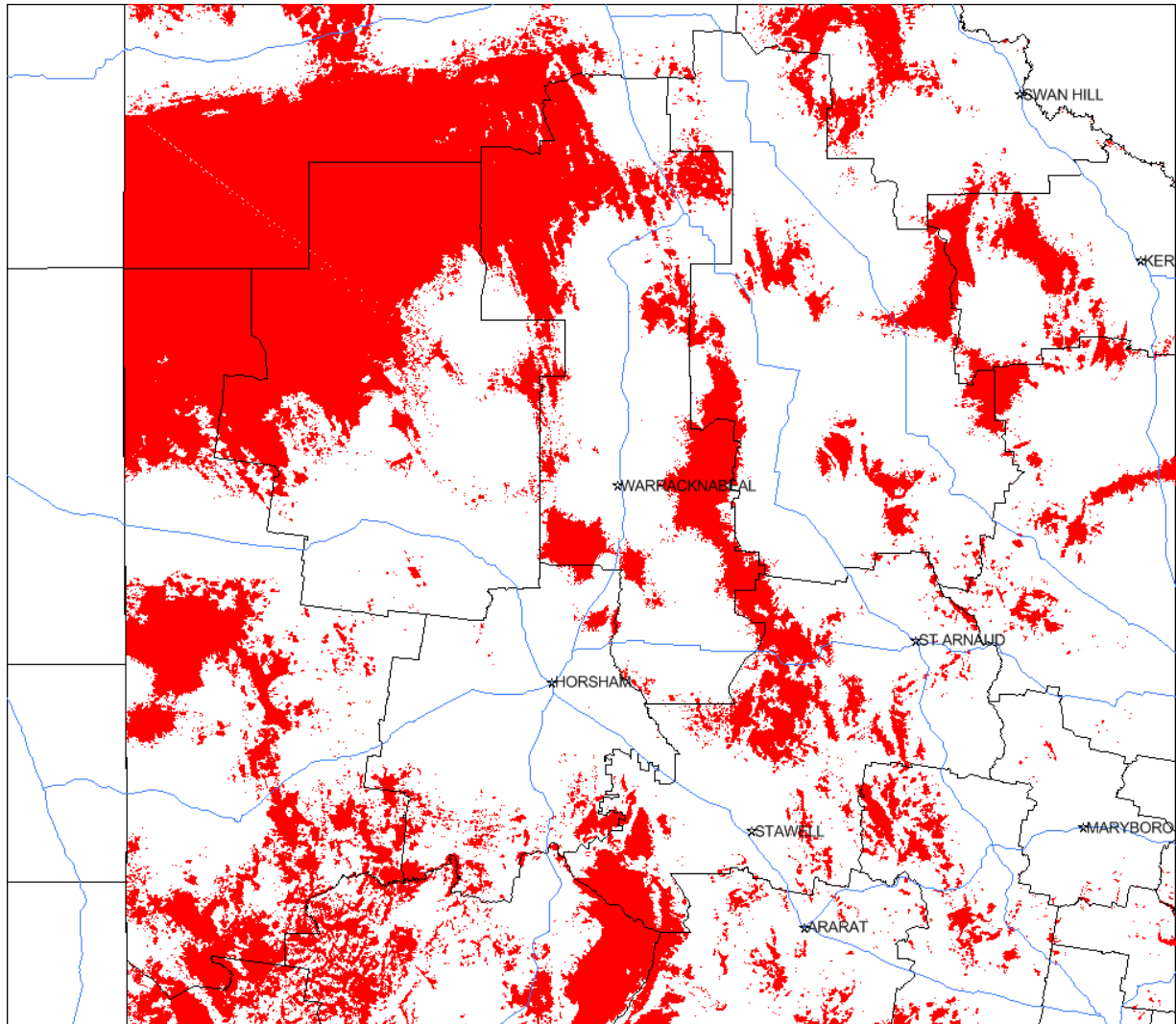
Telecommunications infrastructure – co-location

The provision of services to regional and rural areas of Australia is critical to the future economic sustainability of our communities. Increasing reliance on telecommunications in agriculture, tourism, emergency management and our daily business and household transactions puts regional Australia at a competitive disadvantage due to poor access and lack of competition in the provision of the necessary telecommunications services.

The long term interests of end-users can only be enhanced through increased competition, supported by more effective access and regulation of the full suite of telecommunication infrastructure.

The regional impact of poor mobile phone coverage has again been demonstrated in the Wimmera Southern Mallee during the current fire season. Despite recommendations to royal commissions and government inquiries, our communities have again suffered significant additional risk and emergency services continue to highlight the need for improved communications. Please review the appendix of this submission to gain an appreciation of the frustration, range and complexity of responses to the lack of communications services in key areas.

The map below provides a snapshot of the mobile phone coverage for the Wimmera Southern Mallee region. It does not however indicate the growing issues related to shrinking coverage due to high data loads, or the quality of the service in relation to the needs of the regional community and its businesses.



Black spot areas in the Wimmera Southern Mallee

Regional List of Communities seeking Mobile Access

Local Government and communities have identified a number of key regional communities seeking access to mobile phone services. Drivers for access include emergency services and management, economic benefit to agriculture and tourism.

Yarriambiack Shire - Yaapeet/Nypo, Lubeck, Patchewollock

West Wimmera Shire – Dergholm, Chetwyn, Telopia Downs, Pidgeon Ponds , Wombelano, Minimay, Harrow, Charam

Hindmarsh Shire – Lorquon/Netherby, Yanac/Broughton

Northern Grampians - Halls Gap/ Mt Difficult, Marnoo, Landsborough/Navarre

Horsham Rural City – Laharum, Wartook, Telangatuk, Nurrabiel, Kalkee

Responses to the Mobile Coverage Programme Discussion Paper

Please note that Wimmera Development Association does not have the expertise to provide comment on all questions posed in the discussion paper.

- 1. Would an appropriate minimum quality standard be that base stations must provide high-speed 4G LTE mobile broadband data communication services and also high quality 3G mobile voice and broadband data services? If this is not an appropriate minimum quality standard, what is?**
- 2. What are the most appropriate indicators that could be used to specify the minimum quality standards that should apply to the mobile services being provided through the programme? For instance, should it be a minimum received service signal indication (RSSI) in decibel-milliwatts (dBm)? A similar approach was adopted recently in the UK where a comparable programme specified a minimum RSSI for 3G voice and basic data service of -85dBm on roads and -75dBm in community areas (outside premises).**

From a regional development perspective minimum technical service standards, should be equivalent to the standard applied throughout the nation. For equity of access and service, regional Australian businesses and communities require the ability to compete (nationally and internationally) in the use of technology. We have experienced disadvantage to businesses through poor access and variable services, with demand and expectation growing exponentially. This programme offers a unique opportunity for regional Australia to receive a significant injection of technology – it should be built for the future and not compromised.

All contract arrangements and government policy should include capability to be upgraded as technology advances, to ensure that the technological ‘divide’ between population centres and regional Australia is not exacerbated.

- 5. Should bidders be able to propose to incorporate the use of base stations owned by NBN Co as part of their bid?**
- 6. Should a joint bid (between a specialist network infrastructure provider and a MNO) be permitted? Should it be encouraged?**
- 7. Is it realistic to expect specialist network infrastructure providers to provide backhaul (recognising that they would presumably need to contract with a third party to provide this)?**

Investment in NBN provides an outstanding opportunity to build on the outcomes of both programmes. Very rarely does the timeframes for planning and implementing major infrastructure upgrades coincide, and to have parallel development of these two information technology programmes should provide regional Australia with additional benefit. WDA supports the integration of the programmes at the tender, regulatory and policy review phases, to maximise the accessibility and coverage of the services.

- 15. Do the proposed assessment criteria achieve the right balance to deliver the best value for money outcomes?**
- 16. Should the proposed assessment criteria be weighted, and if so, how?**
- 17. Is there a more effective means of assessing seasonal demand than proposed in criterion 3(c)?**

The proposed assessment criteria should include some consideration of the economic value (contribution to the national economy) of proposed new coverage areas ie return on investment at a national scale. For example agriculture is the prime economic driver of regional Australia. Increasing use of technology in agriculture is driven by productivity and efficiency objectives. Data use in animal management, machinery, farm planning, chemical and nutrient management is growing exponentially. The benefits of improving access to mobile data services in agriculture, through increased productivity, is unrelated to populations centres and the traditional commercial imperatives for mobile telephone investment by the service providers. It should be a consideration in directing government investment, given the National Food Plan and food production targets, export and trade opportunities and the growth in technology use in the sector.

Weighting between the proposed criteria should be based on ensuring ongoing collaboration between providers to extend the benefit of the government investment in new infrastructure into regional areas.

- 18. To what extent would the use of the NBN fixed wireless network result in improved mobile coverage outcomes in regional Australia?**
- 19. How best can a greater role for NBN Co improve competition and choice for consumers in regional Australia?**
- 20. In addition to base station location, design and backhaul access, what other considerations would NBN Co need to take into account if it were to also support mobile coverage and competition benefits as part of its mandate?**
- 21. How can early engagement between NBN Co and MNOs be facilitated in the design of each base station? Is there a role here for the Australian Mobile Telecommunications Association (AMTA)?**
- 22. How can the Mobile Coverage Programme best complement any role that the NBN fixed wireless service plays in improving mobile coverage and competition?**

Whilst it is recognised that the two systems (NBN and mobile) provide separate and discrete technologies, for the consumer the application of the technology has actually merged. There is an expectation that access to broadband and data services is constant and consistent – moving from mobile to business/residence seamlessly. Business, domestic and recreation applications - the whole gamut of information technology uses has actually moved ahead of the differentiation of the infrastructure in its use by consumers.

Government policy, including pricing structures, competition regulation, historic investment models and the balance between public and private investment is restricting the opportunity for regional Australia to participate effectively in this significant technological change.

In particular, the lack of a national vision for telecommunications is impacting on improving service provision, compromising the opportunities in regional Australia. Whilst there have been a number of reviews and investigations into different aspects of telecommunications policy and infrastructure investment, these have been owned and directed by government and commercial interests. The focus has been on the immediate issues, within the existing framework of the industry.

The strategic vision has been missed, including the merging of the application of technology by consumers.

Whilst there has been some collaboration between NBN Co and MNOs in the early planning phase, this has been restricted to consideration of shared local infrastructure. It seems to have been opportunistic and piecemeal, based on the location and configuration of existing tower sites.

Investment in the fixed wireless network has the potential to provide significant boost in telecommunications infrastructure in regional areas with poor mobile service. NBN Co base station location, improvements to local exchanges and access to backhaul services could all contribute to improved mobile services, and should be included in the criteria for allocating the funds through the Mobile Coverage Programme.