

4 November 2020

Attn: Mobile Black Spot Program

CONSULTATION ON GRANT OPPORTUNITY DRAFT GUIDELINES FOR ROUND 5A MOBILE BLACK SPOT PROGRAM

Infrastructure Logic Pty Ltd (trading as OneWiFi and Infrastructure) is a Telecommunications Carrier (Licence no 360) and Mobile Network Infrastructure Provider (MNIP) focusing on the provision of shared high data throughput mobile network infrastructure to enable Smart Communities to support applications requiring ubiquitous data communications on equitable basis for all. Our Neutral Host service should be of broad interest to communities being targeted by the Mobile Black Spot Program (MBSP) and accordingly we believe that our technology offers new ways to improve mobile coverage and competition in less populated and higher-cost to serve regional and remote areas. This is not without its challenges which could be addressed in a suitable trial.

We note that the issues around infrastructure sharing are addressed in several responses to the consultation on Round 5A of the MBSP and have been used to inform the Draft Guidelines. We wish to make further comment in the context of enabling the trial we envisage for demonstrating our solution.

Eligibility Criteria

OneWiFi welcomes the opportunity for a Neutral Host provider, such as us and others alike, to participate in the MBSP Round 5A as a MNIP. We further welcome a separate Trial Solution stream with a simplified application process (e.g. a letter of intent is sufficient) and greater flexibility in operational period. We believe this lowers the barrier to entry for MNIP participants, allowing for untapped innovative solutions to be trialled in-field at scale that may deliver immense benefits for consumers, businesses and regional/rural communities in the near future.

However, we believe eligibility for MBSP Trial Solutions can be further enhanced by:

- Facilitating greater incentives for Mobile Network Operators (MNOs) to work with MNIPs by making it mandatory for MNOs to participate in a number of Trial Solutions, in order to receive funding for Mobile Coverage Solutions.
- Facilitating greater incentives for more than one MNO to work collaboratively with MNIP by making it mandatory for MNOs to jointly participate in a number of Trial Solutions, in order to receive funding for Mobile Coverage Solutions.

We believe the proposed conditions above for MNOs to participate in Trial Solutions will ensure a wide range innovative solutions and delivery models are proposed, assessed, and piloted under MBSP.

Funding Requirements

We note the MBSP expects substantial cash co-contribution for the Trial Solution stream, as per the requirements for Mobile Coverage Solutions. We believe this will potentially stifle the desired outcomes of innovation for the following reasons:

- It creates a financial barrier to entry for innovative MNIP participants
- It reduces the incentives for the MNOs to participate in the Trial Solutions if substantial cash contribution is sought
- The Trial Solution may fall outside existing State and Local Government Connectivity Program funding mandate and may require significant effort to negotiate by all parties to seek substantial funding.
- The future use of the Trial Solution is likely on a national basis rather than local, hence there may not be sufficient incentive for State and Local Government to seed such innovation.

Hence, we propose the MBSP to fund all or a significant portion of the Asset Capital Costs and Operating Costs to foster innovation and align stakeholder incentives. However, MBSP should expect sizable in-kind contribution from the MNIP, MNOs, and State and Local Government as beneficiaries of the Trial Solutions. As a Neutral Host, OneWiFi has already heavily invested in proving out the business model and technology, having built a mobile core and demonstration site.

Assessment Criteria

We note that the Assessment Criteria of the Trial Solution broadly align with the objectives of the MBSP. However, we believe Assessment Criteria 2 – Trial Design and Delivery require some consideration to enhance incentive to innovate and innovators to participate:

- *“The maturity of the proposed solution and technology being adopted, including case studies of where the same or a similar solution has been implemented”* criteria is discouraging the Australian telecommunications industry from coming up with truly innovative solutions that may be nationally and globally scalable, but rather take a follower approach to what others have done around the world that may not be applicable. This ‘play it safe’ criteria will stifle innovative solutions and service delivery models from being put forward. We believe many MNIPs like ourselves can propose and deliver true innovation that is applicable to Australia’s unique geographical, competition, and digital inclusion challenges if given the freedom to do so. In doing it will serve to maximise outcomes for all stakeholders
- *“The applicant’s (and partners’) track record delivering similar solutions and access to personnel and/or partners with the right skills and experience.”* Also reflects a ‘play it safe’ approach that will only allow larger and cumbersome solutions provider to participate in the Trial Solution.

OneWiFi propose for the MBSP Trial Solution to either remove the two criteria or reduce the weighting in the assessment for MNIPs.

Furthermore, we believe Trial Solutions should be assessed on the potential of the solution to service multiple MNOs in sharing common active or passive infrastructure. Points should be given for proposals that include the participation by more than one MNO. However, this proposed change to the Assessment Criteria needs to be considered in conjunction with our recommended changes to the Eligibility Criteria for MNOs to incentives multiple MNOs to work collaboratively with MNIPs.

The existing Assessment Criteria also do not consider the in-kind contribution made by MNIP, and the various State/Local Government partners who are putting forward valuable time, resources, and infrastructure to enable innovation at a national scale.

Spectrum Availability

Access to appropriate spectrum is an essential prerequisite for conducting mobile trials. It must be explicit that collaborating MNOs will make their spectrum available. However, to pilot the next evolution of infrastructure sharing (e.g. RAN sharing) the use of additional spectrum may be required in the absence of more than one MNO participating. This may require the ACMA to make appropriate licence in suitable spectrum available on a trial basis.

Yours sincerely

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