18 June 2020

Mobile Black Spot Program – Round 5A Discussion Paper
Department of Department of Infrastructure, Transport, Regional Development and Communications
Via email: MBSPRound5@communications.gov.au

ALGA submission to the Mobile Black Spot Program – Round 5A - Discussion Paper

The Australian Local Government Association (ALGA) welcomes the opportunity to make comments on the Department of Communications and the Arts' Discussion Paper on the design of the next round of the Mobile Black Spots Program – Round 5A.

ALGA is the voice of local government in Australia, representing around 537 councils across the nation. In structure, ALGA is a federation of state and territory local government associations. This submission has been prepared in consultation with ALGA's member associations and should be read in conjunction with any separate submissions received from state and territory associations as well as councils.

ALGA welcomes the Government's commitment to improving mobile coverage and competition across Australia and the Mobile Black Spot Program's intention to improve mobile telecommunications in regional and remote Australia.

ALGA also welcomes the Government's understanding that there are further mobile black spots which are more marginal economically and which, without assistance, would struggle to rectify their lack of mobile communications.

In preparing this submission ALGA has contacted its State and Territory Associations to canvass their views on the Discussion Paper. Associations have provided feedback in support of the principles and directions of the Round 5A paper, which are included below.

General Comments

ALGA supports the three priority areas addressed in the Round 5A Discussion Paper, namely:
•   High priority natural disaster prone areas including those affected or prone to bushfire;
•   New technology solutions in areas where low population densities have discouraged applications under earlier rounds; and
•   Major regional and remote transport corridors.

ALGA's position over many years has been that people in rural and remote locations should have access to the same level of communications as their urban counterparts. For those remote areas currently without coverage, high entry costs have made it unviable to date for carriers to invest. In providing greater mobile coverage it remains important that fibre backhaul is provided in towns, which would facilitate the capacity for mobile services to be provided equitably to all Australians, particularly in rural and remote areas. ALGA welcomes the intent of Round 5A to target those less economically viable areas, which under previous rounds of the Mobile Black Spot Program would not have been eligible for funding.

ALGA appreciates the Government's ongoing commitment to improve mobile coverage in regional and remote areas through the past 5 Rounds of the Mobile Black Spots program.

Round 5A recognizes the disadvantage of those less economically viable locations. In preparing this submission ALGA has contacted its State and Territory Associations to canvass their views on the Discussion Paper. Associations have provided feedback in support of the principles and directions of the Round 5A paper (see below).

ALGA has previously raised the issue of mobile black spots during natural disasters. The Australian population is increasingly reliant on mobile services to advise of warnings and alerts via SMS messaging. This was particularly important during the recent 2019-20 bushfires and was a critical factor in reducing lives lost in the catastrophic fires. However, mobile phone blackspots continue to exist in regional and remote areas of Australia and services cannot be relied on in some areas or do not exist in some areas. Identifying "high priority disaster prone areas" as one of three priorities in the Round 5A discussion paper is welcomed by local government. While recognizing that Australia's vast landmass makes it difficult to achieve 100% coverage in the foreseeable future, improving mobile coverage will increase the safety of all Australians, particularly those in disaster prone areas.

ALGA supports the design principle that some base stations may also benefit from having redundant backhaul during disaster events, specifically auxiliary backup power and extended backup power resilience. The need for this was exemplified during the recent bushfires.

ALGA also supports the principle that co-contribution will not be mandatory for a proposal to be successful. This is particularly important for low population areas which are in remote areas and which are increasingly marginal in terms of commercial viability. Councils in these areas are already financially challenged and would struggle to make a co-contribution. The suggestion that "additional funding per solution could be made available for solutions in very remote areas" is particularly welcomed.

Comments from State and Territory Associations

Local Government New South Wales (LGNSW) particularly supported the "high priority natural disaster-prone areas" and noted there were many communications failures during the recent 2019-20 bushfires, which highlighted the need for improved and more resilient mobile phone infrastructure. LGNSW has recommended that resilience/betterment funding should be coupled with this priority.

Similarly, the Western Australian Local Government Association (WALGA) supported the "high priority natural disaster-prone areas". WALGA particularly supported the proposal that all funded solutions should provide at least 12 hours auxiliary backup power in the event of the loss of mains power. It further recommended that those stations which do not have the 12 hour backup power under earlier rounds of the program should be retrofitted under the Mobile Black Spots Program to provide extended backup power resilience during power outages in extreme events.

The Municipal Association of Victoria (MAV) also supported the three priority areas and echoed the observations of LGNSW in relation to high priority natural disaster-prone areas. MAV would welcome the opportunity to contribute a priority list of black spot locations observed during last season's bushfires, but also areas under future threat of natural disaster, including areas with high tourism numbers during high-risk periods.

The Local Government Association of the Northern Territory (LGANT) supported all three priorities, saying that Round 5A would suit the Northern Territory's unique characteristics, including very remote locations, cyclone/storm susceptibility, low population density and marginal commercial viability of many black spot locations. According to the Australian Bureau of Statistics Census of Population and Housing: Socio-Economic Indexes for Areas (SEIFA), Australia, 2016, the Northern Territory has 7 of the 21 most disadvantaged local government areas in Australia. Telecommunications are vitally important to these disadvantaged and small communities to ensure they are not left further behind. Addressing these blackspots is vital to provide equity of opportunity for residents to start businesses, support education and health outcomes as well as for communication with friends and family.

One council in the Northern Territory council provided feedback to suggest that in the event of a natural disaster, access to the infrastructure for 'general connectivity' could be reduced (even eliminated) to support the requirements for the disaster response. This scenario would be similar to the response provided by NBN during COVID-19.

Local Government Tasmania (LGAT) supported the design principles and the three priority areas specified in round 5A.

The Local Government Association of South Australia (LGASA) recognised the three priority areas addressed in the Round 5A Discussion Paper and noted that access to reliable mobile phone and internet connectivity was extremely important to individuals and communities in terms of every-day liveability and emergency services, and also for business operability, viability and sustainability. Improved telecommunications coverage in regional and remote areas is fundamental to their development and growth, particularly as communities seek to respond and recover from the COVID-19 pandemic.

The MAV stressed the need for equity of access for (often ageing) low population communities in Victoria, saying it was increasingly important for social and economic and connectedness in the COVID-19 environment and beyond. Many of the local government community services that have transitioned to on-line delivery during the crisis are unlikely to revert to previous delivery methods, making equity of online access more critical for communities than ever before. As a result of the COVID-19 emergency, rural and regional communities may have an opportunity to retain more of their working populations in their communities, assisting economic recovery and growth in our regional areas while also reducing some of the population pressure on our major cities, transport corridors and infrastructure. These opportunities can only be realised with affordable and reliable mobile coverage.

WALGA suggested that in addition to using data from Roads of Strategic Importance and the National Land Transport Network to identify mobile black spots along major regional and remote transport corridors, there may be other sources of data which could also be used to identify mobile black spot needs. Heavy (and light) vehicle traffic data is likely to be available from the State and Territory road agencies to help identify those parts of the road network that are most exposed as a result of absence of mobile phone coverage.

WALGA has also proposed that mobile black spots in National Parks and reserves would benefit from inclusion in further Mobile Black Spot funding rounds. Bushwalkers, hikers, school groups and campers are without communication in the event of natural emergencies. LGAT also supports the inclusion of National Parks in further Mobile Black Spot funding rounds.

State and Territory Associations would welcome the opportunity to contribute to a priority list of mobile black spot locations.

If you require any further information in relation to this issue please contact Monica Telesny, Senior Policy Adviser, on 02 61229433 or monica.telesny@alga.asn.au.

Adrian Beresford-Wylie
Chief Executive
ALGA
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