



Telecommunications
Industry
Ombudsman

TIO submission on design options
for Round 5A of the Mobile Black
Spot Program
June 2020

Introduction from Ombudsman, Judi Jones

Thank you for inviting me to comment on the discussion paper for Round 5A of the Mobile Black Spot Program (MBS Program).

I support the priority areas for this round of the MBS Program and welcome the Department's continued focus on improving communications services for regional and remote consumers.

My office receives complaints about mobile black spots. Between April 2019 and March 2020, 26% of complaints received about *Poor mobile coverage*¹ were from consumers in regional and remote areas.²

While my office does not have jurisdiction to consider complaints about the existence of a mobile black spot, we can handle complaints where a mobile black spot may be part of a broader dispute. For instance, a consumer may complain about experiencing coverage issues with their mobile service at their home or work premises after the provider had confirmed there was adequate coverage at that address.

Our submission broadly responds to the following consultation questions:

- Are there any comments on the coverage areas proposed to be targeted?
- Are there any comments on the types of proposals that would be eligible for funding, including the required coverage outcomes?
- What other design options could be considered that provide multi-provider outcomes?

1. Our complaints show mobile coverage is important for regional and remote consumers

Our complaints show mobile coverage is important for consumers living in regional and remote areas. When there is no coverage, the impact for these consumers can be greater compared to consumers living in major cities. This is partly because these consumers often have access to a limited number of telecommunication services.

Some consumers who rely on one service type describe feeling vulnerable and isolated when they have limited or no mobile coverage at their home. We see recurring themes, such as consumers who:

- live in an area at risk of being impacted by natural disasters such as bushfire, flood, or drought
- are elderly and live alone
- rely on their service to access basic services such as health, education, and banking, or
- have medical issues that may require prompt response.

¹ Figure represents TIO matters with the keyword, *Poor mobile coverage* with area classified by postcode. Matters where we do not have a postcode recorded are not represented in this figure.

² This method classifies Hobart and Darwin as outer regional as they have no significant population nearby. Conversely, towns several hours from major metropolitan areas may be classified as inner regional. A map prepared by the Australian Bureau of Statistics (ABS) is available at [Remoteness Structure](#).

Case study A – No service for elderly consumer on remote property

*Agnes lives alone on a property outside a remote town in NSW. She has no neighbours nearby and uses a landline to connect with family and friends.

When Agnes' landline stopped working, her son Jeffrey contacted her provider to report a fault and ask for a temporary service Agnes could use until the landline was fixed.

Jeffrey said Agnes has a mobile service, but no mobile coverage at her property. He also said Agnes was self-isolating due to COVID-19 and this was increasing her sense of isolation.

Agnes had no access to a telecommunications service until the landline fault was repaired several weeks later. Jeffrey said the time without a phone service was particularly stressful for his mother.

*Name of individuals, organisations and companies have been changed

1.1 When natural disasters occur, mobile services can provide a vital connection

We receive complaints about mobile coverage issues around natural disasters. These show during a natural disaster, a mobile service can provide a vital link for consumers to access safety information and contact family, emergency services, and relief organisations.

When a natural disaster occurs, consumers tell us they need a working mobile service to:

- receive SMS alerts or evacuation information when they are working outside to protect property in preparation for the disaster
- know when, where and how to evacuate safely
- contact emergency services, and
- access relief organisations and stay in touch with important contacts following evacuation.

When a consumer's fixed service has been impacted by a natural disaster such as flood or bushfire, a mobile service may be their only service option until their fixed service is restored. Consumers living at properties with only one way in and out are particularly vulnerable without mobile reception.

The bushfires during summer of 2019/20 presented a challenge for mobile network operators with increased demand for mobile services in areas where local infrastructure was impacted by fire.

Case Study B – After bushfire affects landline, consumer drives to town for mobile coverage

*Nikhil and Rashi are a retired couple who live on a property out from a small town in rural NSW.

They use a landline service and have a mobile service, but no reception at their home. Rashi has a serious medical condition that may need a prompt response.

In February, their property was impacted by bushfire and the landline stopped working.

It took around two months for the service to be restored. During this time, if Nikhil or Rashi needed to make a phone call, they would have to drive to the nearest town for mobile signal.

*Name of individuals, organisations and companies have been changed

1.2 Consumers living in remote communities need telecommunications services to access basic services

We receive complaints from consumers in small regional and remote communities who experience poor or no mobile coverage in their local area. These consumers tend to rely on fewer telecommunications services to do more things, including accessing basic services such as internet banking, education and tele-health.

Case Study C – Poor mobile reception affects consumer in remote indigenous community

*Kirra relied on a mobile service with data to operate her business. When she moved to a remote indigenous community in north Queensland, she began experiencing slow speeds and frequent dropouts on her mobile service.

Kirra said she could not use her mobile service to access services such as internet banking, even though her provider's coverage map showed 3G coverage where she lived and worked.

When Kirra complained to her provider, it said it could not guarantee coverage and recommended she buy an antenna to boost the existing signal. She did this but found the antenna did not improve her service.

*Name of individuals, organisations and companies have been changed

1.3 Consumers living in areas with no mobile coverage have fewer options for interim services

When consumers living in areas with no mobile coverage experience a fault on their communications service, their provider might only have limited types of interim service to offer.

In areas with limited mobile coverage, providers sometimes suggest installing an antenna or booster may improve a consumer's service. While consumers are usually prepared to have equipment installed, they may not agree they should be responsible for the costs, which can be more than \$1,500. These additional costs can disadvantage consumers who cannot afford to pay them.

In locations with no mobile coverage, the only interim option may be a satellite service. During a disaster, demand for services may exceed the number of devices a provider has available to supply.

Case Study D – No interim service option available for rural consumer

*Juan lives in rural NSW and has access to one communication service at his bushland property. In December 2019, bushfire impacted Juan's property and his service stopped working. When Juan contacted his provider, it offered to divert calls to his mobile service until it was able to restore his service. Juan said there was no mobile coverage at his property and requested a satellite phone.

Juan's provider said there were no satellite phones available and the phone would be restored in around a month. A month later the phone service was still not restored. In March 2020, a technician installed a mobile booster at the property but with no mobile reception, this did not work.

The technician said once the provider had assessed the damage, it would take several more months to fix the service.

*Name of individuals, organisations and companies have been changed

2. Tailoring design options to meet areas of need

We see value in considering design options that address the following areas of need:

2.1 Delivering mobile services during a natural disaster

During or following a natural disaster it is crucial that actions taken to deliver mobile coverage are effective.

To minimise the likelihood of mobile service disruption and to maximise the effectiveness of response during natural disasters, we suggest:

- **Protecting infrastructure** – consider mobile installation designs that have more than one access road and sufficient clearance around the mobile facility
- **Meeting community need** – ensure temporary mobile cell towers have sufficient capacity to meet the increased needs of the local community and relief and emergency services, and
- **Sharing temporary mobile cell towers** – consider designs for temporary mobile cell towers that allow for customers of multiple providers to access mobile services.

2.2 Access to telecommunication services for vulnerable communities

To ensure solutions are effective and meet the needs of consumers living in more remote areas, we recommend designs that are:

- **Affordable and user-friendly** – if users need new equipment to access new solutions, the equipment design must accommodate the socioeconomic footprint and level of technical knowledge of the communities who will use them.
- **Robust and relevant** – small remote communities often rely on mobile devices for basic services such as tele-health, education, and banking. Solutions for consumers in remote areas must be reliable and designed around the specific needs of these communities

It is important to continue to provide services using 3G until consumers currently using these services have access to affordable alternate solutions.

2.3 An awareness campaign to educate travellers about mobile coverage

An awareness campaign could educate consumers about the limitations of mobile coverage in regional and remote Australia and ways to maximise in-vehicle coverage.

In the wake of COVID-19, it is anticipated there will be an increase in domestic tourism. It is a timely opportunity to provide a resource so travellers can:

- plan and be better prepared for the reality of travelling in regional and remote areas
- enjoy increased security and safety while on the road, and
- access information about local services and landmarks while travelling, which may boost tourism income in regional and remote areas.

3. Adapting the program design

In its discussion paper, the Department observes the 'economics of new base stations' are moving 'into more commercially marginal markets'. As the program extends into increasingly remote areas, there may be increasingly less economic incentive for mobile network operators to roll-out and maintain mobile coverage in those areas.

Our complaints show consumers living in more remote areas tend to demonstrate a greater reliance on fewer services. While it is critical that these consumers have access to communications services, these areas may be overlooked within the program's current framework.

To incentivise the delivery of mobile service in these areas, there may be value in reviewing the existing framework for the MBS Program. This could include consideration of providing additional grant money, linked to the amount allocated to the project from the mobile network operator's Corporate Social Responsibility fund.