

5 September 2022

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Director  
Regional Mobile Infrastructure Inquiry  
Mobiles, Transmission and Consumer Branch  
Australian Competition and Consumer Commission  
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Dear Mr O'Leary

**ACCC Regional Mobile Infrastructure Inquiry 2022-23**  
**- Access to towers and associated infrastructure**

In response to the public Regional Mobile Infrastructure Inquiry, please find below a submission from Roper Gulf Regional Council:

*3. What costs are involved in accessing land required for the establishment and operation of telecommunications tower infrastructure? Do these fees differ depending on the owner of the land (for example, public v private ownership)?*

In Aboriginal Communities the land tenure resides with the respective land councils who grant section 19 leases to organisations to operate on Aboriginal Land.

*14. Are there additional costs specific to rural, regional, remote or peri-urban areas?*

Primarily, the additional cost when working remote will be the **transportation of material to site**, and **transportation/accommodation of workers and specialists**. High freight costs are due to the lack of supported routes and organisations that provide freight to rural areas. In some cases trucks are not continually going out to a certain community, as such, an organisation will need to be contacted to make a trip solely for one customer, which will likely incur a heavy cost. Staff accommodation in rural areas can also be costly, with **limited amount of accommodation** at many communities, depending on the size of the work crew and length of the project, **portable 'dongas' may need to be transported and setup**. Workers are also entitled to **travel allowance** when working away from home, which again depending on the size of the crew and length of the works, may incur a high cost. Unseen costs when working remote must also be mentioned, with rural areas affected by bush fires, riots and flooding, which can put a halt to works or damage equipment, both causing additional cost.

18. *What kinds of measures would promote improved mobile coverage?*

Having **Telstra conduct multiple maintenance checks on their Telstra towers** quarterly, and an **avenue of communication directly between consumers and Telstra** to advise if outages have occurred or reception has dropped. Possibly having contingencies for Telstra tower outages, such as low orbit satellite internet (such as Starlink) or a muster point with guaranteed satellite connection.

19. *To what extent will the matters raised in the consultation paper impact, or be impacted by, the extension of 5G coverage?*

As mentioned in the consultation paper, a lack of mobile coverage is a constant issue being highlighted in rural areas. With the extension of 5G coverage will come an **increase in telecommunication within the area**, and also open avenues of Internet of Things (IOT) that were previously unfeasible. With coverage being extended, this also increases the ease of service deliver for all current organisations and business' in the area.

20. *How are consumers impacted by a lack of mobile coverage? What are the impacts for indigenous people in regional and remote areas?*

With the lack of mobile reception in many rural areas many consumers are **forced to either invest in pricey 4G boosters, or travel to an area that provides reception**, which not only is inconvenient but at times unviable in emergency situations without. Only current solution is to have a satellite phone on hand, however for consumers a satellite phone can cost **upwards of \$2000**, with monthly satellite subscription also being \$45.

21. *In what geographical areas could mobile coverage be improved?*

In the Roper region there are 4 communities and townships that are the most impacted by lack of mobile coverage, those being:

**Borroloola**

Borroloola is heavily impacted, with it being the largest of the above areas. Reception is only available in the middle of town, and with Roper Gulf's Council Office being on the edge of town, it makes it difficult to make any kind of mobile calls. With multiple camps also surrounding Borroloola, many are unable to get reception, unless they drive or walk into town.

**Urapunga**

Urapunga has no reception at all, only access to phone is through landline, and internet is through Satellite. For any reception a 20km drive will need to be made to Ngukurr.

**Jilkminggan**

Only available reception is with a 4G booster, and even then is extremely limited, with any movement from a certain location likely to cause phone to lose reception and call to drop out. There is currently a Small Cell Telstra station on site that is meant to be providing 4G, however this station is faulty and delivers seemingly no service, this issue has been reported to Telstra with little response.

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Only available reception is with a 4G booster, currently installed at the Roper Gulf Regional Council Office, however has a small range limited to the Council Office alone.

### Mobile roaming during natural disasters and other emergencies

22. *What are the benefits to the general public from the provision of temporary mobile roaming during emergencies? Are there any potential detriments?*

With mobile roaming being enabled during emergencies it **allows for general consumers to make calls and messages out** to both emergency services and close family or friends to advise if they are okay. This also goes both ways, with the mobile roaming allowing for external calls to be made in, possibly over data.

Detriments to this is the inevitability of mobile roaming being utilised for matters not relating to the emergency itself, and the high cost of having an entire area making calls, using data and sending messages during an undefined period.

25. *Are there limitations (eg. capacity) to current technology and business processes that would impact the ability for MNOs to provide mobile roaming during natural disasters and emergencies?*

**Yes, as many communities and regions currently lacking sufficient coverage** across a populated area. Even if mobile roaming was enabled, only a portion of a community would be capable of using the service.

26. *Are there any likely impacts on quality of service if mobile roaming during emergency situations was enabled? What level of service should be enabled – voice, sms, data?*

**Yes**, with everyone likely to utilise the mobile roaming at the same time, **lines are likely to get blocked** with the influx of calls along with **data being slowed** with the increase of phones likely to be used.

For emergency situations, at the **bare minimum voice and SMS** should be enabled, however, in this current environment many people utilise messaging formats that require data, such as Facebook messenger.

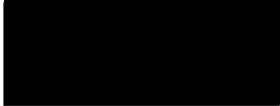
27. *What are the protocols for declaring a natural disaster or emergency? How is this communicated and co-ordinated with mobile network operators?*

In natural disasters and emergencies in Aboriginal Communities the **responsibilities fall to the Local Emergency response committee** and are stipulated in each community's local emergency management plan. These **are co-ordinated with the Regional commander (NT Police)** who is responsible for their implementation and liaises directly with Telstra. However in many of our remote communities in the Roper Gulf region, mobile coverage is so poor that local radio stations are the most reliable means of transmission. This is obviously a poor option as it presupposes that the radio is staffed, the equipment is undamaged and that people are able to listen to the radio in the absence of electricity

28. *What alternative solutions (other than temporary mobile roaming) could be considered to improve network resilience during or after a natural disaster or other emergency?*

With **low orbit satellite high speed internet** (such as Starlink) soon to be available Australia wide, this would be the most practical alternative solution. Otherwise, possible having a **permanent Satellite phone being station at all rural black spots** that can be used by the public, and is only activated during emergency situations.

Yours Sincerely



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