



Australian Competition and Consumer Commission

By email: rmii@acc.gov.au

15 March 2023

To the Australian Competition and Consumer Commission

RE: Regional mobile infrastructure inquiry 2022-23

The Central Land Council (CLC) welcomes the opportunity to provide input to the Australian Competition and Consumer Commission's Regional mobile infrastructure inquiry 2022-23. Our submission focuses on 'the factors that are important to industry in deciding whether to invest in towers and provide mobile phone coverage'¹ by describing the importance of mobile infrastructure and the barriers to securing mobile and internet coverage for Aboriginal people who live in very remote parts of Australia.

About the CLC

The CLC is a Commonwealth corporate entity established under the *Aboriginal Land Rights (Northern Territory) Act 1976* (Cth), with statutory responsibilities for Aboriginal land acquisition and land management in the southern half of the Northern Territory. The CLC is also a Native Title Representative Body established under the *Native Title Act 1993* (Cth). Through our elected representative Council of 90 Aboriginal community delegates, the CLC represents the interests and aspirations of approximately 20,000 traditional landowners and other Aboriginal people resident in its region, which covers approximately 780,000 km² of land. The CLC has a history of advocating for improved telecommunication infrastructure in remote communities.

The importance of mobile infrastructure in the CLC region

Many CLC constituents live in dispersed, small, very remote communities, homelands or outstations which have no mobile infrastructure. Access to reliable and accessible telecommunications services and facilities are essential for these communities' lives, including in everyday activities (interacting with government, service providers, contacting friends and families), as well as for health, employment, business, education, and in emergencies. A lack of mobile infrastructure is often a barrier to people living permanently on their homelands.

Alongside reliable and appropriate mobile and fixed telephone services, internet is critical in remote communities. Digital technology in particular is of paramount importance, given the often isolated nature of remote communities, where people also face issues of access and affordability, compounded by marginalisation that arises from intergenerational trauma, poverty, disability, racism, lack of education and old age.

In 2021, the CLC made two submissions which describe the digital disadvantage many CLC constituents face and make recommendations to increase digital and telecommunication inclusion:

1. To the 2021 Regional Telecommunications Review, September 2021; and
2. To the Indigenous Digital Inclusion Discussion Paper November 2021.

Both of these submissions are enclosed.

Barriers to mobile infrastructure

The CLC's community development team advocates for constituents who want mobile and other internet and telecommunications infrastructure installed and maintained in their community. The following case studies from constituents in our region provide clear examples of where a lack of connectivity hampers communities' economic aspirations, ability to practice culture and safety while living on homelands. Some examples relate to mobile infrastructure, while others relate to phone boxes and internet infrastructure. We have chosen to include all case studies to show how vital any infrastructure that increases connectivity is for people living in very remote parts of the CLC region.

Spotted Tiger Outstation

Barbara Petrick lives on Spotted Tiger Outstation, about 200km north-east of Alice Springs, on the Plenty Highway, on Akekawrrwenteme Ureyengeal Land Trust. Mrs Petrick's family has lived there for six generations. She and her partner have established a campground on the property to host tourists, school groups and people attending the annual Harts Range Races. There is no mobile reception at Spotted Tiger or the campground. About 10-15 years ago, NBN funded an 'activ8me' phone, which is meant to provide free wifi and calls to landlines, and calls to mobiles via a phone card which can be purchased at the Atitjere shop 8km away. Mrs Petrick said this phone is very unreliable, and the wifi barely works. A technician has only come 2-3 times in the years since it was installed.

A lack of reliable infrastructure limits Mrs Petrick's ability to fulfil her economic aspirations for the campground, which has mistakenly been marked as free on various websites. A reliable internet connection would give Mrs Petrick and her family more control and determination over the management, accessibility and unique vision of their campground business. Critically, they would be able to ensure all visitors pay for their campsite and usage of facilities, as the site isn't always monitored because their residence is away from the campsites.

Mobile infrastructure would also increase safety. There are many hills and waterholes around the outstation, and Mrs Petrick and other Traditional Owners have consistently expressed concerns about the lack of mobile service and the risk to their families and tourists if there is an emergency. Mrs Petrick also says it makes it less appealing for her nieces to spend time on country, and limits visits by elderly people who want to spend time on country.

Imangara Community Living Area

Imangara is about 200km south-east of Tennant Creek, with a population of around 80 people. It doesn't have mobile reception, but there is a wifi hotspot supplied by Central Australian Youth Link-Up Service (CAYLUS) and a public phone. Community members have to stand next to the CAYLUS hotspot to access the internet.

At a community meeting in October 2022, Imangara residents told CLC community development staff that better reception is vital for:

- Emergencies, as the nearest health clinic is around 30km away in Alekarenge.
- When people are sick or passing away, and they need to get in contact with 000.
- When the public phone does not work (for example when it is raining).
- Talking to CLC and other organisations about meetings.
- Talking to families not living in the community.
- Checking on families who are travelling to make sure they are safe.
- Services and families who want to contact residents.
- Residents who want to contact their bank, Centrelink, the police and other services.
- Accessing entertainment.

Telstra has confirmed there are no plans to extend mobile service coverage to Imangara, and the community is unable to fund it themselves.

Mt Eaglebeak Outstation

Mt Eaglebeak Outstation is about 250km north-east of Alice Springs, 40km from Atitjere/Harts Range with nine dwellings which are clustered into two areas – north and south, which are about 600m apart. People live in all dwellings across the north and southern areas. The outstation grows over summer with visitors from Queensland and Alice Springs, including senior elders with health conditions and mobility restrictions. It has no reception. A Telstra payphone was initially installed in the southern cluster, and then moved to the northern cluster. The phone only works intermittently, and Telstra has not actioned requests for maintenance. Residents want a second phone installed in the southern cluster, as there are concerns elderly residents couldn't walk the 600m to the phone in the northern cluster.

The CLC recently contacted Telstra to put forward the community's request for a second phone and to add wifi. In response, Telstra said their data 'suggest[s] the site has a negative, Net Social benefit' which would sometimes prompt Telstra to remove the phone, but they wouldn't remove the phone in this instance. It is unclear to the CLC how Telstra assesses net social benefit; for residents, a second phone and mobile reception would ensure residents have a way to call for help in emergencies and has many other social benefits. Community development staff were also told by NIAA that new mobile infrastructure for Mt Eaglebeak would likely be delivered through the NT Government's small cell program in 2023. CLC has since found out that Mt Eaglebeak was not selected for the small cell program.

Uluperte Homeland

Uluperte Homeland is about 220km east of Alice Springs, and belongs to the Williams family. It is a significant cultural site and has three houses. It has permanent water and a solar power system, but no mobile reception, with the nearest phone 40km away. The lack of mobile service is regularly cited as a hurdle to the Traditional Owners going to spend time on the homeland. Without phone service people feel worried for their safety. For some family members with permanent health conditions, the risk is too great to knowingly go bush without being able to call for help if it's needed.

In 2019, Traditional Owners decided to spend their own money on a Telstra Small Cell. CLC, on behalf of Traditional Owners, liaised with Telstra on the project, but there were significant hurdles due to Telstra's regulatory obligations and the reality of installing infrastructure out bush. Unfortunately, CLC and Telstra were not able to come to agreement and the project didn't go ahead.

Recommendation

We recommend that industry consider the remoteness, demographics of the community and likely positive cultural, health, economic and social impacts of mobile phone coverage when deciding to invest in mobile infrastructure in very remote parts of Australia. Industry should also consider the substantial risks and disadvantages to community members if they do not have access to mobile infrastructure.

If you have any queries about the above submission, please contact Senior Policy Officer Nicola Flook

[REDACTED]

Yours faithfully,

[REDACTED]

Les Turner

Chief Executive Officer

ⁱ ACCC, Scope of the Inquiry ([weblink](#)).