



300-304 Mair Street  
BALLARAT VIC 3350  
Phone +61 3 5327 2835  
Fax: +61 3 5327 2830

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Australian Competition & Consumer Commission  
GPO Box 3131  
Canberra ACT 2601  
E: [rmii@acc.gov.au](mailto:rmii@acc.gov.au)

Dear Sir/Madam

**Submission to the 'Regional mobile infrastructure inquiry 2022-23' by Regional Development Australia (RDA)**

Established in 2010, Regional Development Australia (RDA) is an Australian Government initiative that brings together all levels of government to enhance the development of Australia's regions. A national network of RDA committees has been established to achieve this objective.

RDA Grampians' vision is to promote the economic development of Victoria's west and position the Grampians region as the place to work, live and do business. Attracting government investment and leveraging regional effort and expertise is critical to achieving this vision.

Any effort to improve mobile telecommunications performance in regional Australia is therefore welcomed. In this submission we will initially raise our general views and will also respond specifically to certain questions in the Consultation Paper.

***General submissions***

Mobile telecommunications are essential to regional business and communities. Recent disruptions including the 2020 bushfires, the COVID-19 pandemic, and this year's floods have highlighted the importance of mobile telecommunications for both survival and recovery in extreme situations. High quality mobile coverage essential for regional economic recovery, and it is also critical in providing access for 000 calls and emergency alerts during catastrophic events.

These events have also highlighted the gap in service availability and quality between metropolitan and regional Australia. This takes place against the backdrop of growing dependence on mobile telecommunications in more settled times. A rising number of regional households rely on mobile telecommunications for day-to-day communications, and the rise of cashless payment and "cloud" based business services makes reliable fixed and mobile telecommunications essential to regional businesses.



While the formal terms of this inquiry are narrow, they touch on wider issues of significance to regional communities that are also raised in the Consultation Paper.

### ***Coverage Transparency***

It is difficult to evaluate the benefits and costs of regional mobile coverage and its absence without a clear picture of the state of that coverage. While black spots are defined, many serviced areas have 'grey' intermittent mobile coverage. Access to clear coverage information will empower regional development stakeholders including committees, councils, businesses, and industry to make strategic and informed mobile coverage decisions, which will in turn drive and optimise regional economic and social growth.

Optus, Telstra and TPG Telecom have reportedly all committed to improve the provision of mobile coverage information to consumers and businesses. They also committed to discussing with each other measures to improve comparability of coverage and quality of different networks. In addition, the Australian Mobile Telecommunications Association (AMTA) also advised the ACCC that it would work with its members to improve coverage map comparability and develop a co-building process for greenfield sites.

However, limited progress has been made since then, with the 2021 Regional Telecommunications Review recommending that the Government ensure that measures are undertaken to increase the accuracy and transparency of mobile network quality and coverage information, including network congestion. This includes measures to collect and standardise mobile network coverage information and develop a tool to empower consumers to compare network performance and service availability.

The Committee further recommended that the Government provide funding to undertake an investigation and audit to collect and report mobile coverage performance across regional Australia, including congestion. The Committee also noted the ongoing work undertaken by the United States Federal Communications Commission (FCC) to develop mapping of both fixed broadband and mobile LTE coverage under the Broadband DATA Act.<sup>52</sup> and suggested that a similar approach should be considered.

Given the lack of progress on this task, we recommend that the ACCC expedite these efforts, potentially under its telecommunications record-keeping or other information gathering powers.

### ***The Mobile Black Spot Program (MBSP)***

While the Mobile Black Spots Program (MBSP) has increased mobile coverage in regional Australia, this has predominantly been single carrier coverage. Further, in its current form the MBSP has been attracting less carrier investment over time.



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Department of Infrastructure, Transport, Regional Development and Communication's (the Department) launched a consultation on the design of Round 5A of the Mobile Black Spot Program (MBSP) in 2020, noting that only 28% of active mobile sites funded under the first 4 rounds of the MBSP were shared by MNOs.

In its submission to the Department, the ACCC supported the Government's proposal to prioritise solutions that provide coverage from more than one MNO, regardless of whether the funding recipient is an MNO or a mobile network infrastructure provider that has a service agreement with MNOs (e.g. a neutral host). In the Consultation Paper for this inquiry, the ACCC also recommends exploring other options such as neutral host models and active sharing on MBSP-funded sites.

We strongly support this approach. Telecommunication infrastructure tenders should include stronger incentives to share infrastructure and provide enough time for MNOs to identify and negotiate sharing opportunities. This will optimise investment in regional infrastructure resources with enhanced quality and coverage and supports economic and social regional development outcomes.

In addition, we argue that government-funded telecommunications infrastructure should be open access as a matter of principle, as all taxpayers have contributed to it. In the case of mobile infrastructure, this could be implemented as a mandatory roaming requirement for the relevant sites.

### ***Emergency roaming***

We are on record as supporting mandatory roaming in regional areas generally. Recognising that the terms of this inquiry are more focussed, we confine our remarks to roaming in situations of emergency.

The issue of emergency alert roaming was raised in the recent Royal Commission into Natural Disasters hearing. During the 2019/20 bushfires regional residents and visitors' ability to contact their families and access emergency apps and alerts was limited to the network range of their mobile provider. This issue has only been highlighted by this year's flooding in the eastern States. Alerts, general information, and personal messages about disasters are increasingly communicated using a mix of voice, text, and online applications that rely on mobile broadband.

The Regional Telecommunications Independent Review Committee (RTIRC) also recommended in its 2021 review that the Government undertake a feasibility study to consider the capability for mobile roaming to be deployed in emergency circumstances, which was the genesis of the current inquiry.





We strongly support the introduction of mandatory roaming in emergency situations. In many cases, individuals who are out of coverage of their MNO are nevertheless within coverage of another MNO. Emergency roaming would therefore increase their access to crucial information.

In addition, emergency roaming would increase depth and reliability of mobile communications in emergency situations by allowing individuals to roam to the strongest signal at any location. Emergency roaming deployed on a location basis in times of emergency would therefore provide significant safety benefits to regional residents and visitors.

### Responses to specific questions

In addition to these general remarks, we have responses to certain questions posed in the Consultation Paper.

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

Regional communities and households need high quality mobile coverage more than ever. Mobile communications are increasingly used to deliver a range of app-based government and commercial services and are increasingly used for app-based personal communication as well.

Fixed telecommunications are not a substitute for regional consumers, who often travel long distances for access to medical, banking, and other services. Nor do they support the wide range of mobile app services only available through the smartphone technology.

The gap between metropolitan and regional mobile infrastructure has been highlighted by recent “black swan” events such as the 2019/20 bushfires, the COVID-19 pandemic, and the recent floods.

In addition to the consumer impacts, regional mobile infrastructure gaps are a constraint on regional economic development and local businesses. Our recent regional roundtable consultations highlighted the importance of digital access in driving economic regional recovery from COVID-19. This dependence on digital access, including mobile access, is increasing with the rise of cashless transactions that require “always-on” connectivity (including for mobile businesses) and the delivery of business-related services (e.g. accounting service inputs) through mobile apps.

To the extent that indigenous communities are more isolated and outside of existing mobile coverage, these considerations apply even more strongly.

22. What are the benefits to the general public from the provision of temporary mobile roaming during emergencies? Are there any potential detriments?
23. What are the benefits to emergency service personnel and organisations from the provision of temporary mobile roaming during emergencies?

As noted above, the main benefits to the general public arise from the provision of temporary mobile roaming during emergencies are the improved extent and depth of coverage in areas where emergency roaming has been implemented. This supports improved access to voice, text and data that support crucial personal and official communications in times of disaster.

In the case of emergency personnel, these benefits are increased by the additional dangers they face in entering disaster areas. Emergency service personnel commonly use public mobile communications to complement specialised communications devices, so improving the extent and quality of coverage will also improve their awareness of emerging threats that can help them protect residents, visitors in the area, and themselves.

We do not anticipate any detriments to the general public or for emergency service personnel from the availability of roaming in emergency situations.

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?

In our view, emergency roaming across all three mobile networks would improve service coverage, depth, and quality as devices would be able to roam to the strongest network in any given location in emergency situations.

To maximise the benefits, emergency roaming arrangements should therefore cover voice, SMS, and data without exclusions, as both official and inter-personal communications are now delivered on a mix of these (including, for example, WhatsApp and State emergency alert apps). Excluding any one of these would reduce the number of official and personal channels for the conveyance of warnings



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and other information and would therefore increase the risks faced by both the general public and emergency workers in emergency situations.

Kind regards



Stuart Benjamin  
Chair