



Mobile Coverage Programme Discussion Paper
Local Government Submission

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Introduction

The Local Government Association of Tasmania (LGAT, the Association) is the representative body of Local Government in Tasmania. Established in 1911, the LGAT is incorporated under the *Local Government Act 1993* with membership comprising 28 of the 29 Tasmanian councils.

The objectives of the Association are:-

- To promote the efficient administration and operation of Local Government in the State of Tasmania;
- To watch over and protect the interests, rights and privileges of municipal Councils in the State of Tasmania;
- To foster and promote relationships between Local Government in the State of Tasmania with both the Government of Tasmania and the Government of the Commonwealth of Australia;
- To represent the interests of the members of the Association generally, and in such particular matters as may be referred to the Association by its members; and
- To provide such support services to the members of the Association as the Association may by resolution in meeting determine.

General Comments

LGAT would like to thank the Department of Communications for the opportunity to comment on the proposed Mobile Coverage Programme (the Programme) discussion paper. This submission has been developed following collaboration with member councils.

LGAT welcomes the coalition's election commitment to improve mobile phone services throughout remote, regional and outer-metropolitan Australia and appreciates the effort that has been made by the Department of Communication to consult with Tasmanian Councils in relation to the discussion paper.

The lack of mobile coverage in regional Tasmania is a major concern to Tasmanian Councils. The risk associated with poor mobile coverage was highlighted in the Tasmanian Bushfire Inquiry through a key recommendation on the need to address mobile coverage in high risk bushfire locations. On a national level, the 2011-12 Regional Telecommunication Review found that the adequacy of mobile voice and broadband services was the predominant concern raised with the Committee in every regional consultation.

LGAT understands that the objective of the Programme is to improve the coverage of high quality terrestrial mobile voice and wireless broadband services to regional Australia, to enhance competition in the provision of such services and to ensure that maximum value for money is achieved.

In finalising the Programme it is important that the Government considers its role in addressing the issue of market failure and assesses whether the Programme should focus on investing in locations which are on the margin of commercial viability or those locations that are unlikely to be commercially viable without Government intervention.

Specific Comments

Programme Parameters

Selection Criteria

Tasmania faces unique challenges in relation to mobile coverage due to its topography and dispersed nature of its population. It is imperative that locations with difficult topography are not excluded from benefitting from the Programme because of the limited criteria on which bids are selected. It is recommended that the selection criteria be broadened to include the social and economic benefits of improved mobile coverage and the vulnerability of communities to emergencies. The Programme should also be mindful of the spread of the successful bids, making sure that there is equitability across States and Territories.

As with most communities, Tasmanian communities are increasingly reliant on mobile technology for information and communications during emergencies. Governments, including the Tasmanian Government, are increasingly using technology as a means of relaying warnings to communities during an emergency. This can be problematic in those communities with sporadic or no mobile coverage and was evident during the January 2013 Tasmanian fires on the Tasman and Forestier Peninsula. As a consequence of the poor mobile reception, a key recommendation to come out of the Tasmanian bushfire inquiry was that the Government should discuss options for greater phone coverage and redundancy in areas of high risk in emergency situations where there are presently telecommunications limits.

In addition to the need for greater coverage the issue of access to transportable mobile base stations during an emergency has been raised by our member councils. The availability of such infrastructure would improve communication during emergencies and could improve the safety of communities. Funding for such towers through a programme such as the Mobile Coverage Programme would be welcomed.

Programme Model

LGAT supports the inclusion of open access and co-location provisions in the Programme. Mobile network competition has been an issue in Tasmania and as such the second model (bids from multiple network operators) and the third model (bids from infrastructure providers), or a combination of the two is preferred. These options not only support competition but are likely to result in a greater spread of bids from across Australia.

Leveraging the NBN

The discussion paper highlights the opportunity to use the roll out of the NBN fixed wireless network to improve mobile phone coverage and competition in Australia. These opportunities include co-locating mobile equipment on NBN facilities LGAT would support any reasonable measure that promoted the use of NBN Co wireless tower infrastructure to improve mobile coverage in Tasmania.

Planning considerations

The issue of local planning and telecommunication towers is a matter that should not be overlooked in the design of the Programme. Over recent years, new telecommunication towers and some extension to existing towers have caused issues with local communities. For many years Local Governments have argued that telecommunications infrastructure should be subject to planning and development regulations, to ensure that the deployment of mobile base stations is sensitive to the needs of the community, minimizes visual impact and takes into account health and environmental considerations.

However, councils are aware of the balance needed between the growing demand for phone coverage and data capacity and the need for appropriate consultation with the community.

In view of these considerations it is recommended that carriers bidding for funding under this Programme undertake adequate and timely consultation with Local Government.

EOI process -\$20 million component of the program

The discussion paper proposes that the \$20M component of the Programme will occur following the \$80M Mobile Network expansion and will fund a number of base stations in locations not funded under the \$80M component of the Programme. This component of the Programme calls on co-contributions from the Carriers and other parties such as Local Councils. It is anticipated that Local Councils may provide in-kind support to the carriers by providing support such as site, road access and the like.

It is important to note that our member councils are concerned about the repercussion of providing support to carriers particularly in relation to ongoing maintenance of base stations. This was a major concern with previous Federal Government programmes such as the blackspot television tower programme which required councils to fund on-going maintenance of the towers.

It is understood that this is not the intention of the \$20M component of the Programme and as such it is recommended that this is clearly articulated in the final Programme documentation.

Summary

Mobile coverage and the lack of mobile coverage in regional Tasmania is a major concern to Tasmanian councils. There are many locations in Tasmania that have no or intermittent mobile coverage, including major transport routes to highly visited iconic Tasmanian destinations. The potential implication of such poor coverage is particularly concerning in areas of high bushfire and flood risk as well as in areas with high traffic volumes.

LGAT has consulted its member councils in relation to areas of poor coverage in Tasmania and has encouraged its member councils to submit locations directly to the Department of Communications. LGAT has also provided details directly to the Department through the recommended email address.

LGAT appreciates the opportunity to provide a submission and would be happy to provide additional information should it be required.