

Mobile Coverage Programme Discussion Paper

Submission Cover Sheet

Submission Information

This cover sheet should be attached to submissions made to the Department of Communications in relation to the Mobile Coverage Programme Discussion Paper.

Contact Details

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Date: 19th December 2013

Confidentiality and privacy

All submissions and comments, or parts thereof, will be treated as non-confidential information unless specifically requested, and acceptable reasons should accompany each request. Email disclaimers will not be considered sufficient confidentiality requests.

Respondents lodging a submission should be aware that submissions (excluding any information agreed to be treated as confidential information) will be made publicly available, including on the Department of Communications' website. Submissions and comments will be subject to freedom of information provisions. Despite a submission being identified as confidential or sensitive, submissions may be disclosed where authorised or required by law, or for the purpose of parliamentary processes.

Do you want all or parts of the submission to be treated as confidential? **Yes** **No**

If yes, identify below which parts of the submission are to be treated as confidential (and provide a reason):

If the submission contains personal information of any third party individual, indicate on this Submission Cover Sheet if that third party individual has not consented to the publication of his or her personal information:

Submission Instructions

Submissions are to be made by **5:00pm (AEST) Friday 28 February 2014**.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text-based formats via the email address mobilecoverage@communications.gov.au

Alternatively, submissions can be sent to the postal address below (to arrive by the due date):

The Manager
Mobile Coverage Programme
Department of Communications
GPO Box 2154
CANBERRA ACT 2615

All submissions lodged will be acknowledged by the Department of Communications by email (or by letter if no email is provided). Respondents lodging a submission who do not receive acknowledgement of their submission should contact the Department. Submissions which are not acknowledged by the Department as being received may not be considered. Respondents should be aware that emails greater than 10Mb may not be successfully delivered.

1. Would an appropriate minimum quality standard be that base stations must provide high-speed 4G LTE mobile broadband data communication services and also high quality 3G mobile voice and broadband data services? If this is not an appropriate minimum quality standard, what is? **Yes**
2. What are the most appropriate indicators that could be used to specify the minimum quality standards that should apply to the mobile services being provided through the programme? For instance, should it be a minimum received service signal indication (RSSI) in decibel-milliwatts (dBm)? A similar approach was adopted recently in the UK where a comparable programme specified a minimum RSSI for 3G voice and basic data service of -85dBm on roads and -75dBm in community areas (outside premises). **This seems appropriate**
3. Does delivery option 2 for the \$80 million Mobile Network Expansion component raise any additional issues that need to be considered? **No**
4. Could options 3(a) or 3(b) for the \$80 million Mobile Network Expansion Project be delivered in conjunction with options 1 or 2 to enable network infrastructure providers to compete with MNOs? **What would be the pro's and con's?**
5. Should bidders be able to propose to incorporate the use of base stations owned by NBN Co as part of their bid? **Yes if this could achieve better economy in the project**
6. Should a joint bid (between a specialist network infrastructure provider and a MNO) be permitted? Should it be encouraged? **Yes**
7. Is it realistic to expect specialist network infrastructure providers to provide backhaul (recognising that they would presumably need to contract with a third party to provide this)? **Yes**
8. Is option 3(b) suitable for Australia's regional mobile market? **Yes**
9. What are the appropriate specifications for a base station to be able to accommodate at least two other MNOs? **Not sure**
10. Will the proposed open access provisions be sufficient to encourage other MNOs to use the base stations to provide mobile services? **Not sure**
11. Should MNOs be required to pre-commit to/co-invest in the base stations for which they wish to share infrastructure? **Yes**
12. What is the estimated additional cost of requiring all new base stations to meet the open access requirements? **Not Sure**
13. Should the proposed open access provisions be applicable to base stations funded under the \$20 million component, or should there be scope to exclude some base stations from these requirements? **Should be open to all**
14. What are the most appropriate models/benchmarks for establishing access and backhaul pricing, and for reflecting in that pricing the value of the public funding received by the owner of the facilities (such that access seekers receive an appropriate discount from the market price for access to the facility)? **Not Sure**
15. Do the proposed assessment criteria achieve the right balance to deliver the best value for money outcomes? **No, it should not just be based on number of residences, we have a number of people who work on our property at any one time and we have no mobile coverage. This needs to consider the businesses (a lot of small business particularly farms) in our area where coverage would greatly assist operations. All of this is currently satellite broadband or we rely on landline. I also work in the neighbouring council and required to go out of mobile range and without mobile coverage there is a big issue with loan workers as most duress devices rely on a GSM network.**
16. Should the proposed assessment criteria be weighted, and if so, how? **Yes it should really be highly weighted on coverage of area that are thoroughfares to population ie road networks (State roads) and regional roads that provide transport through non**

mobile regions and to consider the number of emergencies/accidents that have occurred outside the GSM range.

17. **Is there a more effective means of assessing seasonal demand than proposed in criterion 3(c)? This also needs to consider events in regional areas where there is limited accommodation. For example in Boorowa there are more than 15,000 people that attend a one day event and accommodation would only allow for 500 people (within township that has coverage) yet there are B&B's located around the region which are not within the GSM coverage.**
18. **To what extent would the use of the NBN fixed wireless network result in improved mobile coverage outcomes in regional Australia? Provide more coverage to regional Australia by using the NBN network and making more areas available to coverage.**
19. **How best can a greater role for NBN Co improve competition and choice for consumers in regional Australia? Because of the existing network you are limited in choice of provider by coverage.**
20. **In addition to base station location, design and backhaul access, what other considerations would NBN Co need to take into account if it were to also support mobile coverage and competition benefits as part of its mandate? Not Sure**
21. **How can early engagement between NBN Co and MNOs be facilitated in the design of each base station? Is there a role here for the Australian Mobile Telecommunications Association (AMTA)? I would think so, not really sure**
22. **How can the Mobile Coverage Programme best complement any role that the NBN fixed wireless service plays in improving mobile coverage and competition? Not Sure**

The primary concern is the development of an extended coverage network that firstly will allow Emergency calls to be made, currently this is limited to existence of a GSM network. Secondly, without network coverage we are not able to operate a business as efficiently. We do not have mobile phones that work on the farm so any business always has to be done at the house and not practical. This can be crucial when need to be contacted about market opportunities and in the past 1 hour has made a big difference when not being able to be contacted.