

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	
Name of respondent:	[REDACTED]
Name of organisation:	DEANS MARSH COMMUNITY
Phone:	[REDACTED]
Email:	[REDACTED]
Website (if applicable):	
Date:	27 FEB 2014
Confidentiality and privacy	
<p>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.</p> <p>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.</p> <p>Do you want all or parts of the submission to be treated as confidential? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p><i>If yes, identify below which parts of the submission are to be treated as confidential (and provide a reason):</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
<p>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:</p> <p>Submission Instructions</p> <p>Submissions are to be made by 5:00pm (AEST) Friday 28 February 2014.</p> <p>Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text-based formats via the email address mobilecoverage@communications.gov.au</p> <p>Alternatively, submissions can be sent to the postal address below (to arrive by the due date):</p> <p style="padding-left: 40px;">The Manager Mobile Coverage Programme Department of Communications GPO Box 2154 CANBERRA ACT 2615</p> <p>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.</p>	

MOBILE COVERAGE PROGRAMME

Discussion Paper

Submission from Residents of Deans Marsh Victoria

24th February 2014

Introduction

Basis for this submission

This is a community based submission from Deans Marsh, Victoria. In Deans Marsh mobile coverage is provided a Telstra Tower 1.3 kms SE of the township and was provided only after the residents of the area petitioned Telstra. Telstra admit (see attached letters to and from Mr Thodey) that in some areas served by the tower reception is poor due to local topography, obstructions such as trees, distance from the base station and building materials. Some residents have aerials to enable them to get coverage for internet but many do not have reasonable or any mobile phone coverage, even with "blue tick" phones.

We would also like to emphasise that the Otway Region of Victoria is a high fire risk area and good mobile coverage is essential to the safety of many residents during the summer months (see attached letter to the Emergency Services Commissioner and his response.)

The Department has committed \$20 million of the total to improve mobile coverage in locations with **unique** coverage problems, such as areas with high demand for services during seasonal holiday periods. Deans Marsh suffers specific coverage problems during holiday periods due to an increased influx of tourists; Deans Marsh also experiences problems because of its unique topography.

We would also like to remind the Department of the findings of the 2011-2012 Regional Telecommunications Review that "identified a lack of adequate mobile voice and broadband coverage as the issue of greatest concern to regional communities". This is indeed the feeling in the Deans Marsh area. \$100 million does not seem to us an adequate sum to deal with this major regional priority.

\$80 million Mobile Network Expansion Project

Delivery Option 1

Any bid from private MNO's will be based on purely commercial factors. Although the Commonwealth will be preparing a list of locations that are reported to have poor or no mobile coverage, we believe the welfare of the MNO's shareholders will be more important than the welfare of the residents of regional Australia and therefore MNO's will be targeting those areas of greatest return not those areas of greatest need. (See attached letter from Mr Thodey.) Bidding for a share of \$80 million is unlikely to be of significant interest to MNO's compared to their yearly profits.

We would be concerned about any option that provided money to a single MNO as we doubt that this would in any way improve competition and allow regional residents to choose providers and therefore have parity with their urban counterparts.

We suggest that an appropriate minimum standard of quality of service be parity with urban areas in Australia so that regional Australia is not disadvantaged by location.

Option 2

This option proposes an even more “lottery like” solution for the delivery of services to regional Australia. We believe most of the \$80 million would be spent on paperwork and administration costs and still it does not address the need for users to have a choice of provider, nor does it address the fact that market forces cannot solve the issues of inequality of services to small markets. The least profitable areas will be left out.

Option 3

We believe this option may provide the best outcomes for regional Australia. We believe that networks of small base stations at closer intervals would provide better coverage to areas with topographical problems in particular. This would create networks like those in countries such as Vietnam where there is excellent mobile coverage throughout the country. However we do not believe that \$80 million is enough to fund this option nor would the private NMO’s see this option as being profitable enough to contribute considering the population numbers.

We are also concerned at the proposal to use part of the NBN Co’s infrastructure and in particular back haul as we believe this would seriously affect the capacity of the NBN infrastructure to deliver high quality broadband to regional areas and regional areas need high quality broadband service if they are to prosper. We believe that the future proofing of the NBN would be compromised by sharing backhaul with MNO’s.

\$20 million Black Spots Project

We understand this money is for areas that have unique issues such as seasonal influx of users. The Deans Marsh area certainly qualifies on the basis of this example; the area also suffers from unique problems such as topography, trees and distance from base stations.

However we believe that to request contributions from stakeholders will further disadvantage the disadvantaged. Rural communities are the least likely to be rich in resources. We already pay for the privilege of unsatisfactory coverage from MNO’s; it is unclear why communities such as ours should be asked to contribute more. It also seems that seasonal influx of tourists is the only “unique” criteria that will be considered when assessing submissions; [see Extent of Coverage Benefit Item c page 12.]

Open Access and Co-location Provisions.

We believe that this is an important part of any proposal for mobile coverage in regional Australia as it would address the important need to increase competition and provide regional residents with choice of carrier. We wonder however if the amount of money the government is proposing to contribute will be sufficient to encourage both co-location and open access to private companies for whom profit is the main motivator.

Proposed Assessment Criteria

We hope the external assessment committee will include community representatives. We trust that rural communities particularly those in areas prone to natural disasters, will have preference over national highways and arterial roads.

Utilizing the NBN Fixed Wireless Network

The utilization of the NBN Co network seems a reasonable proposal, but it should not be done at the expense of the broadband service being provided by the NBN; if the network was to be used, the fibre should be upgraded so that this does not happen.

We cannot properly assess this solution as we do not have detailed knowledge of those areas to be covered by the NBN; the maps showing the time line for the planned roll out have been removed from their web site.

The Case for Deans Marsh

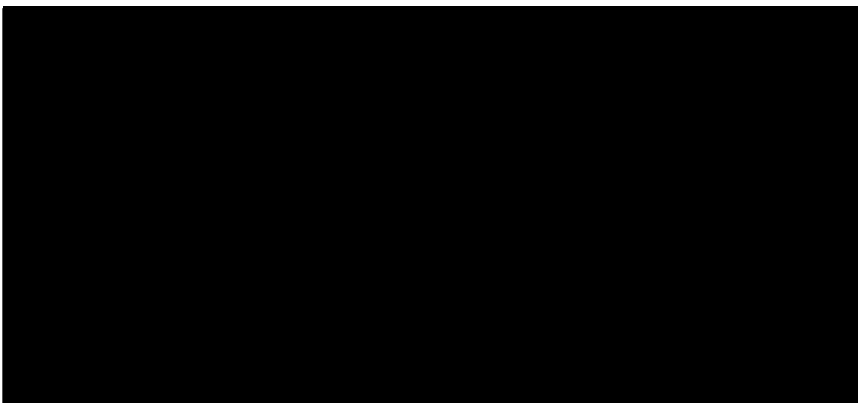
Deans Marsh has been declared one of the towns in Victoria most in danger from bush fire attack. Although parts of the village have reasonable mobile coverage many of the surrounding areas including Parkers Road, Bambra Cemetery Road, Pennyroyal, Boonah, Murroon and Bambra have little or no coverage mainly because of topographical issues and distance from the base station. Although in these areas an antenna can assist to some extent, with internet access problems, it does not improve mobile phone coverage. The response Telstra provided only makes us realise there will be no commitment from them to improve access until it is commercially viable for them to do so.

The Deans Marsh area also suffers from a reduction in the efficiency of the service during seasonal influxes of tourists. Therefore, when we need good coverage the most – during the summer at the height of the bush fire season – access to coverage is hampered by increased usage by tourists. We do not believe however that coverage should be dependent on cash contributions from the residents of the area.

The case for a national mobile strategy.

We believe Deans Marsh is exactly the kind of rural community that this investment is intended to help. However, we also know that there are communities facing similar problems across the country, and that this particular fund is inadequate for the national task. We find it objectionable that we may have to enter into a lottery with other areas and communities, knowing that if one community is successful another misses out. Mobile coverage is a matter of life and death for many rural residents.

Universal mobile coverage throughout Australia is a goal towards which any progressive and self-respecting government should be striving. In rural and regional Australia there is a very strong feeling that our taxes should be spent on infrastructure projects that benefit all Australians, such as universal mobile coverage and the NBN.



Attachments:

Letter to David Thodey CEO Telstra

Response from David Thodey CEO Telstra

Letter to Craig Lapsley Fire Services Commissioner Victoria

Response from Craig Lapsley Fire Services Commissioner Victoria

Letter to Sarah Henderson MP Federal Member for Corangamite

CC:

Sarah Henderson MP Federal Member for Corangamite

Craig Lapsley Fire Services Commissioner Victoria



Dear Mr Thodey

Re: Mobile Coverage and Internet Access in Deans Marsh

We are writing to you to seek your intervention to improve the mobile phone coverage and internet access for residents in Deans Marsh, Victoria (3235).

The mobile phone coverage via the 3G network in Deans Marsh is poor and unreliable which has been recognised by Sarah Henderson, the Federal Member for Corangamite who has stated that:

During the election campaign I advocated for better mobile phone coverage across Corangamite and I am continuing that push as the Member for Corangamite." I am prepared to stand up and fight for communities across Corangamite that currently have inadequate mobile phone coverage" (26 November 2013):

Ms Henderson has also accurately identified the possible consequences of such poor coverage:

Inadequate mobile phone coverage is a significant concern for regional communities. Lives can depend on accessing mobile phone networks in emergencies, so expanding mobile phone coverage has clear benefits to public safety – as well as to the productive capacity of regional communities" (16 December 2013)

On the matter of internet access, we rely on mobile coverage for wireless internet via the 3G network. In line with our poor mobile coverage, internet access is inadequate due to unreliability of connection, slow speeds and frequent dropping out. Members of our community rely on Internet access for their occupations, in addition to the obvious health and safety issues in our fire prone area.

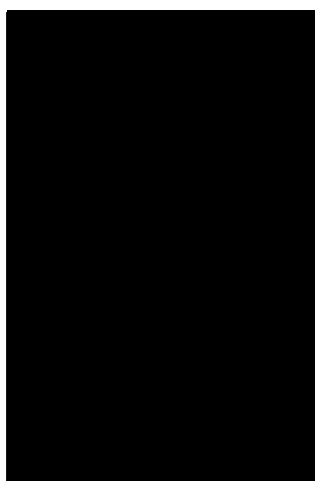
As you would be aware, reliable mobile coverage and reliable internet access are essential services in the world in which we now live. Businesses in our community include wineries, berry farms, holiday accommodation and the like and it is impossible to run these without reliable internet access and web site access for the public at large. Mobile coverage and internet access cannot be done without and for those living in a country community where access to health services is not at hand and information about bushfires is essential,

both of which can have life and death consequences. Here the need is greatest.

We have been interested to hear about temporary mobile network 'boosters' installed at Gellibrand for the recent Great Victorian Bike Ride. While those temporary towers were functioning, mobile reception and internet reliability were greatly improved, until the towers were removed at the end of the event. It is a good indication that the technology for better coverage can be readily provided.

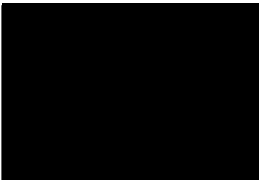
Accordingly, we are seeking advice from you as to what specific actions will be taken to address the problems for Deans Marsh residents outlined above and the timeline for their completion.

Yours sincerely



.....
.....
.....
.....
.....

Residents of Deans Marsh




27th January 2014

The Emergency Services Commissioner



Attention: Craig Lapsley

Dear Sir

We have attached correspondence between ourselves, Sarah Henderson the Liberal MP for our area, Ms Henderson's assistant,  and Mr Michael Thodey the CEO of Telstra.

Over the days of extreme weather conditions from Tuesday 14th January to Friday 17th January it was difficult for us to access the internet and the emergency services website. The poor levels of internet and mobile phone service have been an issue for some time and have prompted our letters to Ms. Henderson and Mr. Thodey and previous email correspondence to Ms. Henderson. Last week we emailed Ms. Henderson with a desperate plea to intervene as internet access is vital to our safety here in the Otways during the fire season. She responded by requesting details of our internet account and the enclosed email dated 20th January was our response to her. As yet we have had no reply.

Our situation is not an isolated one in this area as many people in Deans Marsh have poor internet and mobile phone coverage. We have spoken to representatives of Telstra at the Colac office and have been told that any decision to upgrade the service would be a commercial one and therefore unlikely because of the low number of residents in the area.

We consider it is important that the emergency services are aware of the poor internet and mobile phone coverage throughout Deans Marsh and the Otways, particularly at this time of the year. It is likely that timely emergency warnings and advice will not be received by all residents in the area and that their lives may be threatened as a consequence of this.

We understand that during the Great Victorian Bike Ride, Telstra were able to boost mobile phone and wireless internet connections at both Gellibrand and Forrest for the duration of the ride. Are the emergency services able to exert any influence to have the telecommunications services in the Otways upgraded or boosted at least during the fire season?

Yours sincerely,



[REDACTED]

3 January, 2014

Sarah Henderson MP
Federal Member for Corangamite

[REDACTED]

Dear Ms Henderson,

Re: Mobile Coverage and Internet Access in Deans Marsh

We are writing to you as our Federal Member to seek your intervention to improve the mobile phone coverage and internet access for residents in Deans Marsh.

From your pre-election advertising and post-election statements and actions, you seem to be acutely aware of the unreliability of the mobile phone coverage in our area and the possible serious consequences:

“During the election campaign I advocated for better mobile phone coverage across Corangamite and I am continuing that push as the Member for Corangamite.” I am prepared to stand up and fight for communities across Corangamite that currently have inadequate mobile phone coverage” (26 November 2013); and

Inadequate mobile phone coverage is a significant concern for regional communities. Lives can depend on accessing mobile phone networks in emergencies, so expanding mobile phone coverage has clear benefits to public safety – as well as to the productive capacity of regional communities” (16 December 2013)

On the matter of internet access, we rely on mobile coverage for wireless internet via the 3G network. In line with our poor mobile coverage, internet access is inadequate due to unreliability of connection, slow speeds and frequent dropping out. Members of our community rely on Internet access for their occupations, in addition to the obvious health and safety issues in our fire prone area.

Once again, the Coalition has promised to fix the problem as stated in the “Coalition’s Plan for fast Broadband and an Affordable NBN (April 2013):

“The Coalition will deliver fast, affordable and reliable broadband to **ALL** (our emphasis) Australians”; and

Suburbs, regions, towns and districts with the poorest services and greatest need for upgrades will receive first priority.” (Deans Marsh falls into the category of *poorest services* and *greatest need*).

Our request for your intervention and action is based on the assumption that the pre-election promises and post- election statements made by yourself and the Coalition and referred to above, were made in good faith and in the knowledge that something would actually be done to solve the problems with mobile coverage and internet access in a timely manner.

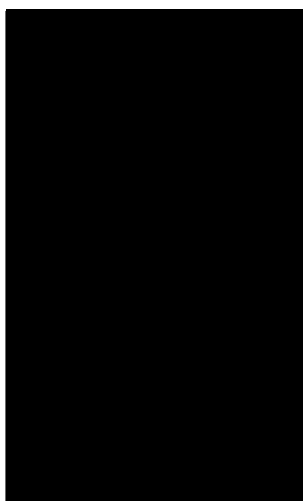
As you and the Coalition seem to be aware, reliable mobile coverage and reliable internet access are essential services in the world in which we now live. Businesses in our community include wineries, berry farms, holiday accommodation and the like and it is impossible to run these without reliable internet access and web site access for the public at large. Mobile coverage and internet access cannot be done without and for those living in a country community where access to health services is not at hand and information about bushfires is essential, both of which can have life and death consequences. Here the need is greatest.

We have been interested to hear about temporary mobile network 'boosters' installed at Gellibrand for the recent Great Victorian Bike Ride. While those temporary towers were functioning, mobile reception and internet reliability were greatly improved, until the towers were removed at the end of the event. It is a good indication that the technology for better coverage is more easily provided than the political will.

Accordingly, we are seeking advice from you as to what specific actions (not further promises of action or inquiries or budget considerations) will be taken to address the problems for Deans Marsh residents outlined above and the timeline for their completion.

We will be making an appointment with your office to meet with you in person to hear your responses.

Yours sincerely



.....
.....
.....
.....
.....

Residents of Deans Marsh