

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:	Greater Shepparton City Council
Phone:	[REDACTED]
Email:	[REDACTED]
Website (if applicable):	[REDACTED]
Date:	28 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>	
Submission Instructions	
<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="margin-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>	

It is with great appreciation that the Federal Government is implementing measures to ensure that the circumstances surrounding inadequate mobile phone coverage in regional areas across Australia are rectified.

As highlighted within the Mobile Coverage Programme Discussion Paper, mobile phone coverage remains a significant issue for Australians living, working and travelling in regional areas of the country and these concerns are very much relevant to the Greater Shepparton region.

The programme highlights that the Australian Government's approach will be via a funding program which consists of two streams:

\$80 million Mobile Network Expansion Project: to improve mobile coverage along major transport routes, in small communities and in areas that are prone to experiencing natural disasters.

\$20 million Mobile Black Spots Project: to improve mobile coverage in locations with unique coverage problems, such as areas with high demand for services during seasonal holiday periods.

The Greater Shepparton region consists of several small communities who experience limited or no mobile coverage and Greater Shepparton City Council is in full support of the outlined initiative.

In response to the questions that are highlighted within the Discussion Paper:

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?

Whilst within Shepparton we have 4G LTE capability, Council would be aiming to obtain 3G capability as a minimum in the regions blackspot locations.

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).

Council does not have any specific requirement within the RSSI measures other than providing a reliable service to the premise of our citizens.

Does delivery option 2 for the \$80 million Mobile Network Expansion component raise any additional issues that need to be considered?

No specific point of view on this issue.

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?

If the infrastructure is in place there is potential for a greater spread of capacity and capability, as the user base grows you would expect MNO's to utilise the infrastructure to provide a service. If the

MNO's do not see the investment as being viable, one would assume the user base does not exist. However this assumption would depend on the overall cost for a MNO to establish itself.

Should bidders be able to propose to incorporate the use of base stations owned by NBN Co as part of their bid?

Yes, as long as all bids that could utilise this ability are informed as part of the process.

Should a joint bid (between a specialist network infrastructure provider and a MNO) be permitted? Should it be encouraged?

If the aim is to improve services for the greater benefit of Australian Citizens and savings can be found to allow for a larger area of benefit all avenues should be explored. As part of the evaluation process joint bids should be encouraged.

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)?

Council believes that this is a realistic expectation, however the overall cost of the backhaul should be at least partly funded.

Is option 3(b) suitable for Australia's regional mobile market?

Council has concerns regarding this approach. Is this essentially handing infrastructure to the likes of a Telstra to then provide out as a wholesaler?

What are the appropriate specifications for a base station to be able to accommodate at least two other MNOs?

Not in Council's area of expertise.

Will the proposed open access provisions be sufficient to encourage other MNOs to use the base stations to provide mobile services?

Not in Council's area of expertise.

Should MNOs be required to pre-commit to/co-invest in the base stations for which they wish to share infrastructure?

It is the belief of Council that MNO's should play some part in the funding if the solution is basically a turnkey solution, however if it is only the supporting infrastructure the answer to this question would be 'no'.

What is the estimated additional cost of requiring all new base stations to meet the open access requirements?

Not in Council's area of expertise.

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?

Not in Council's area of expertise.

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)?

The proposed backhaul access and pricing sounds reasonable. Access seekers should be awarded an appropriate discount.

Do the proposed assessment criteria achieve the right balance to deliver the best value for money outcomes?

Although there is limited knowledge of this subject within Council, it is Council's understanding that the proposed assessment criteria does achieve the right balance.

Should the proposed assessment criteria be weighted, and if so, how?

An appropriate evaluation criteria should be applied to ensure the areas that require the most attention are still rated highly to ensure it is not just the wealthier or high growth areas that are priorities over those who really need the connectivity.

Is there a more effective means of assessing seasonal demand than proposed in criterion 3(c)?

It is possibly the only measureable item that can be used, however for regional areas that have a high concentration of recreational campers, boating and other such activities it is Council's belief that this approach may not capture that requirement.

To what extent would the use of the NBN fixed wireless network result in improved mobile coverage outcomes in regional Australia?

The NBN has to be taken into account, especially where NBN may be able to provide support for this implementation but also for the areas where the NBN may not provide any benefit.

How best can a greater role for NBN Co improve competition and choice for consumers in regional Australia?

Improved data services will introduce less reliance on traditional forms of communication and provide improved VOIP and internet data use, hopefully adding more competition and lowering the costs of data.

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 in Council's area of expertise.

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)?

A consistent process needs to be in place.

How can the Mobile Coverage Programme best complement any role that the NBN fixed wireless service plays in improving mobile coverage and competition?

Utilisation of infrastructure and backhaul seems to be the obvious roles for NBN and mobile coverage.