

4 November 2020

Department of Infrastructure, Transport, Regional Development and Communications  
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**RE: Mobile Black Spot Program Round 5A Draft Guidelines**

ACCAN thanks the Department of Infrastructure, Transport, Regional Development and Communications for the opportunity to respond to the Mobile Black Spot Program Round 5A Draft Guidelines.

We welcome the changes the Draft Guidelines have introduced which target areas prone to natural disasters, promote competition outcomes in previously under-served regions and encourage active infrastructure sharing between Mobile Network Operator (MNO) or a Mobile Network Infrastructure Provider (MNIP).

However, there are a number of recommendations ACCAN made in relation to the MBSP Draft Round 5A Guidelines which have not been included which warrant further consideration.

**High priority natural disaster-prone areas including those affected or prone to bushfire**

The mandated use of new technologies not currently used in Australia to provide commercial mobile services (5.1.6) is welcomed as a method of providing mobile coverage solutions to high priority natural disaster-prone areas (5.1.3). However, ACCAN recommends the expansion of these provisions to include specific funding for existing technology such as boosters, repeaters and other equipment that can be used to extend cover and support connections in at risk areas.

The coverage of additional expenses, under Asset Capital Costs, for increased auxiliary back-up power, redundant backhaul and other measures to increase the level of resilience in natural disaster-prone areas (5.2.3) is welcomed. However, this provision could be strengthened by allowing for specific funding to increase the resilience of crucial emergency disaster coordination and evacuation and assembly points to ensure connectivity for those in crisis.

**New technology solutions in areas where low population densities have discouraged applications under earlier rounds**

ACCAN welcomes the indicative \$8 million funding available for applications to trial new technology solutions or service delivery models (2.2.2) as a new means of delivering coverage to low population density areas that currently do not receive coverage. While ACCAN agrees that all funded Trial Solutions must deliver innovative solutions to users of mobile services (4.2.7) we encourage the program to also make funding available to support expansion of pilot projects that have already commenced with early success. Options known to ACCAN are as follows:

- the Remote High Speed Wireless Technology Pilot rolled out by the Northern Regional Development Australia (RDA) Alliance. This pioneering microwave backhaul project has successfully connected two remote Indigenous communities to Nextgen fibre via long-distance point-to-point microwave technology. The success of the pilot program demonstrates the potential of low-cost, small scale

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Australia's peak body representing communications consumers*

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telecommunication solutions to reach communities in remote regions.<sup>1</sup> ACCAN understands that microwave spectrum is readily available and could be more broadly used to extend existing fibre networks to reach Indigenous and non-Indigenous communities in remote and very remote regions which do not yet have coverage.

- the Centre for Applied Technology<sup>2</sup> mobile hotspots which have been funded by the Northern Territory government along main roads in emergency sites and tourist areas which are a couple of hundred kilometres away from a mobile tower. This supplementary service could be used more widely to extend the footprint of mobile coverage at an affordable price.
- Satellite backhaul is a third solution already in use in Australia to reach low population and remote regions, however new low earth orbit (LEO) satellite technology offers even greater potential to reach these communities. If Australian governments and telecommunications providers were to invest in this technology it could provide low population communities in remote and very remote regions with WiFi hotspots and support significantly higher connectivity. As LEO satellites do not require a fixed antenna, they could enable increased mobile connectivity and have the potential to support an affordable communications network linked to the 5G network which would provide seamless network coverage.
- In New Zealand, a multi-operator radio access network (MoRAN) on the 4G and 5G network delivers high bandwidth for video calling, streaming and downloads nationwide. Implementing a similar infrastructure sharing agreement in rural, remote and low population areas in Australia could deliver similar benefits, and significantly support greater coverage.<sup>3</sup>

### **Major regional and remote transport corridors**

ACCAN welcomes the provision of incentives to encourage investment in trial mobile coverage solutions for designated major regional and remote transport corridors (5.1.5). We have some concerns, however, that the Value for Money assessment criteria in the guidelines (section 6) will mean some transport corridors and roads that need mobile coverage may be assessed as ineligible and will therefore not receive the financial incentive of a 33% reduction to the assessed cost per km<sup>2</sup>.

In areas where the value for money of a proposed solution is limited, but the solution is needed by the community, the MPBS program should allow enough flexibility to increase funding.

### **Types of proposals eligible for funding, including required coverage outcomes**

As suggested previously by ACCAN, consideration should be given to extending MBSP funding to subsidise expensive mobile antennae repairs to enable consistent connectivity across long distances, such as the Telstra T-Go car mounted repeater. These devices are expensive but facilitate much greater connectivity for those who can afford them.

### **Design options that could be considered to provide multi-provider outcomes**

ACCAN recommends that the MBSP program give preference to mobile telecommunications networks that grant full network access to Mobile Virtual Networks Operators (MVNOs) in remote areas. Opening up the

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<sup>1</sup> <https://www.rdant.com.au/remote-high-speed-wireless-technology-pilot>

<sup>2</sup> <https://digitalterritory.nt.gov.au/action-plan/remote-mobile-phone-hotspots>

<sup>3</sup> <https://itbrief.co.nz/story/2degrees-unveils-new-infrastructure-sharing-agreement-passes-1b-milestone>

program to MVNOs would give consumers in remote areas a wider of range mobile providers to choose from, often at a cheaper price.

**Ways the program could assist potential state government and third-party co-contributors**

Although the Department has offered to provide government contact details to organisations registered as a eligible applicants under Round 5A, ACCAN continues to advocate for the MBSP to provide specific funding for a facilitator to assist with brokering industry and government partnerships on behalf of small organisations in remote areas to deliver effective outcomes at minimal cost.

We reiterate the concern that making applicants “solely responsible for forming relationships and negotiating contributions with any relevant third parties, and for testing and/or verifying any advice received from these parties” (3.3.4) will mean remote and very remote communities with few connections are at a competitive disadvantage, which will prevent some of the areas most in need of better mobile coverage from reaping the benefits of the MBSP program.

**Requirement for at least 12 hours of auxiliary backup power for small cells**

Although the draft guidelines require Macrocell Base Stations to provide a minimum of 12 hours back up power in the event of the loss of external power to a site (4.2.5), all other base stations are only required to provide a minimum of 3 hours backup power “unless it is not feasible to do so” (4.2.6). ACCAN’s view that a minimum of three hours back up power will not be adequate, particularly in high risk areas.

A minimum 12 hours auxiliary backup power, and preferably 24 hours in remote and isolated areas where outages last longer, is necessary to provide adequate coverage in areas prone to natural disasters such as bushfires. The Round 5A guidelines should specify the same minimum backup period of 12 hours for both Macrocells and Small Cells. Provision needs to be made in the guidelines for the use of renewable energy sources such as solar and wind to provide sustainable forms of fuel for back-up batteries in these regions.

Should our comments need further clarification, please contact Stephanie Whitelock, Policy Officer by email [Stephanie.Whitelock@accan.org.au](mailto:Stephanie.Whitelock@accan.org.au)