

25th August 2021



The Department of Infrastructure, Transport, Regional Development and Communications
Via email: PUMP@infrastructure.gov.au

RE: Consultation PUMP draft funding guidelines

ACCAN thanks the Department for the opportunity to contribute to its consultation on the Peri-Urban Mobile program – Grant opportunity guidelines. ACCAN supports the Peri-Urban Mobile Programs objectives of delivering funding to improve mobile connectivity in bushfire prone areas on the peri-urban fringe of Australia’s major cities. Residents living in bushfire prone areas are extremely reliant on communications during an emergency, where access to information is vital.

In regard to the guidelines, ACCAN has the following suggestions to ensure that the Peri- Urban Mobile Program effectively meets its objectives:

- Section 3.4.3 should be amended so that any third party in-kind co-contribution *must* be reflected in a reduction in the amount of funding the applicant seeks for a proposed solution, if applicable. If this requirement remains optional, it may create an opportunity for the applicant to be eligible for funding, including the value of the in-kind contribution, where the applicant is able to retain the difference in value. Increasing transparency also creates accountability in the relationship between the third party and the applicant.
- Section 4.1.3 proposes that Mobile Network Infrastructure Providers (MNIPs) applications must be accompanied by written evidence of intent from at least one Mobile Network Operator (MNO) to enter into a commercially binding commitment to use the infrastructure to deliver mobile services. We consider that MNIPs should provide intent from *two* MNOs to enter into commercially binding commitments to use the infrastructure to deliver mobile services. To do so would ensure that consumers have more choice of MNO, preventing a situation where there is one monopoly provider of mobile services in the area.
- Section 6.3.1 proposes in *Criterion 3 – Community support*, that the proposed solution will provide improved handheld coverage to a location identified as a priority by an MP. Whilst it is appropriate for Federal Members of Parliament who represent an electorate that covers local government areas within an eligible location to be invited to identify locations within their electorate that may benefit from improved coverage (section 5.2.5), we do not think it is appropriate that it be included as a criterion for determining where the programs are placed. In order to maintain the program’s integrity any opportunity of pork barrelling

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should be removed. It is sufficient to have support from Emergency Services, state government, the community, landowners, and the local government.

- Under section 8.4.5, the Department will provide consideration to the degree in which competition is provided at a single solution, for example from at least two MNOs. We consider that this should be elevated further and included in the *Criterion 2 – Design, Delivery and Cost* for increased clarity.
- Lastly, given that the program is aimed at improving mobile coverage in bushfire prone areas, there needs to be consideration of the resiliency of the networks being built. Any new infrastructure built should be required to include longer lasting back up power, emergency power solutions for rapid service restoration, expanded protection zones around the telecommunications sites, redundant backhaul and any other physical hardening measures.

If you have any questions regarding these issues, please do not hesitate to contact me.

Sincerely

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