
Submission

28 November 2022

Director – Mobile Black Spot Planning and Development
Regional Communications Branch
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
Canberra ACT 2601

Re: Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines

The Australian Communications Consumer Action Network (ACCAN) thanks the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) for the opportunity to comment on the draft Mobile Black Spot Program (MBSP) Improving Mobile Coverage Round (IMCR) Grant Opportunity Guidelines (the Guidelines).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

Telecommunications connectivity provides considerable socio-economic benefits for consumers and is a crucial part of the Government's 2022 *Better Connectivity Plan for Regional and Rural Australia*.¹ The Guidelines for the MBSP are integral to expanding Australia's telecommunications infrastructure, which supports mobile connectivity and resilience for communities and businesses in regional, rural, and remote areas.

In response to the IMCR grant opportunity guidelines for the MBSP, ACCAN provides four recommendations:

- Expand the Guidelines to subsidise mobile coverage extension equipment.
- Promote access to 24-hours of auxiliary back-up power in isolated areas.
- Make publicly available the decision-making process for selecting the 54 Target Locations.
- Provide additional support for local communities to broker partnerships through facilitators and resources.

Support for multi-Mobile Network Operators (MNOs) solutions and mobile coverage extension equipment

ACCAN is very supportive of the draft Guidelines emphasis on the development of multi-MNO solutions (as per clause 4.2.8.), in addition to the requirement that an explanation must be provided if co-location is not possible (as per clause 4.2.10.). Furthermore, ACCAN supports the draft Guidelines position that the grantee must offer Backhaul access to Co-locating MNOs (as per clause

¹ Australian Government, 2022, *Better Connectivity Plan for Regional and Rural Australia*. Available at: <https://www.infrastructure.gov.au/media-communications-arts/better-connectivity-plan-regional-and-rural-australia>.

4.2.16.) at a price that is more favourable than those set by the Australian Competition and Consumer Commission (ACCC) under the Domestic Transmission Capacity Service Final Access Determination (DTCS FAD) (as per clause 4.2.18.).

Additionally, we urge the Department to further expand the draft Guidelines to subsidise mobile coverage extension equipment. This recommendation reflects ACCAN's 2021 submission to the *Regional Telecommunications Review*, which highlighted the importance of expanding the MBSP to include repeaters, boosters, and other types of equipment that extend coverage to maximise investment and support connections in areas of high-risk of natural disasters.²

Access to 24-hours of auxiliary back-up power in isolated areas

We are pleased that the Guidelines now requires a minimum of 12-hours auxiliary back-up power for Macrocell base stations (as per clause 4.2.6.), and all other base stations in the event of a loss of external power to a site unless the Department is satisfied it is unfeasible to do so.³ However, ACCAN recommends that communities in remote and isolated areas prone to natural disasters have access to 24-hours auxiliary back-up power supply available.

During an emergency, energy services may require longer than 12-hours to access an isolated site, which is why ACCAN suggests that 24-hours of auxiliary back-up power should be available for high-risk areas. This recommendation reflects ACCAN stakeholders' views in rural and remote areas that emphasise the importance of mobile coverage for contacting emergency services, especially in medical circumstances and after a natural disaster.⁴

ACCAN furthermore considers the draft Guidelines should offer provisions for the use of Stand Alone Power Systems in remote and very remote locations. This reflects ACCAN's previous submission to the *MBSP Round 5A Draft Guidelines*, which argued:

*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.*⁵

Make publicly available how the Department selected Target Locations

ACCAN supports the Department's use of Target Locations to assist areas that have previously struggled to participate in MBSP grant opportunities. According to the draft Guidelines, the Department has identified 54 Target Locations eligible for this round of the MBSP. Of these Target Locations, 27 are in New South Wales, followed by Tasmania (9), Western Australia (6), Queensland (4), South Australia (4), Victoria (3), and the Australian Capital Territory (1).⁶

ACCAN recommends that the Department further clarifies its decision-making process for the inclusion of each Target Location in the IMCR. This recommendation provides the opportunity to

² ACCAN, 2021, *ACCAN submission to Regional Telecommunications Review 2021*. Regional Telecommunications Independent Review Committee. Available at: <https://accan.org.au/accans-work/submissions/1921-2021-regional-telecommunications-review>. Page 19.

³ Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2022, *Draft Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines*, Clause 4.2.7.

⁴ ACCAN, 2021, *ACCAN submission to Regional Telecommunications Review 2021*. Regional Telecommunications Independent Review Committee. Available at: <https://accan.org.au/accans-work/submissions/1921-2021-regional-telecommunications-review>.

⁵ ACCAN, 2020, *ACCAN submission to Mobile Black Spot Program Round 5A Draft Guidelines*. Available at: <https://accan.org.au/accans-work/submissions/1768-mobile-black-spot-program-round-5a>. Page 3.

⁶ Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2022, *Draft Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines*, Appendix A. Target Locations and Issue Descriptions.

further strengthen public confidence in the MBSP through the *Commonwealth Grant Rules and Guidelines*' key principles of transparency and accountability.

The Guidelines should also support avenues for communities that are not situated in a Target Location, but would greatly benefit from the MBSP, to participate in the initiative. Participation should be supported with appropriate educational resources, for example ACCAN's *Mobile Black Spot Community Guide*.⁷ This is especially important for communities who may be disappointed to find out that they are not situated in a Target Location.

Providing written reasons for the selection or rejection of sites is integral for supporting communities in making informed decisions about whether advocating to be a Target Location in future IMCRs is of value for them. For instance, communities not located in a Target Location need to understand whether they were unsuccessful in gaining access to the initiative because the Department ranked their location as a low priority for the MBSP.

Communities that the Department ranks low priority may therefore choose to redirect their efforts and limited resources towards alternative options, such as the Regional Connectivity Program (RCP), instead of re-submitting funding applications. Alternatively, communities who just missed out or failed to be considered a Target Location due to technical reasons may see value in advocating for their community to be included in future IMCRs.

Support for local communities to navigate the MBSP

ACCAN acknowledges and supports the Department's offer to provide the contact details of State, Territory, and local government to organisations that are deemed eligible for funding under the MBSP (as per clause 3.3.4.). However, we propose that throughout the MBSP local communities should have access to a facilitator to support them with participating in the initiative. ACCAN suggests that specific funding should be available for a facilitator to assist local communities with navigating their engagement with government and industry as part of the initiative.⁸

We thank the Department for the opportunity to comment on the Guidelines. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at amelia.radke@accan.org.au.

Yours sincerely,

Dr Amelia Radke
Senior Policy Adviser

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers.

⁷ ACCAN, n.d., *Mobile Blackspots - Community Consultation Guide. 2nd Edition*, accessed 18 November 2022. Available at: <https://accan.org.au/consumer-information/consumer-resources/mobile-blackspots-community-consultation-guide>.

⁸ ACCAN, 2021, *ACCAN submission to Regional Telecommunications Review 2021*. Regional Telecommunications Independent Review Committee. Available at: <https://accan.org.au/accans-work/submissions/1921-2021-regional-telecommunications-review>. Page 20.