
Submission

22 May 2023

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

Re: Mobile Network Hardening Program Round 2 Grant Opportunity Draft 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 Mobile Network Hardening Program Round 2 Draft Grant Opportunity Guidelines (**the program**).

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.

ACCAN supports the program as a vital measure to mitigate the impact of natural disasters by strengthening the resilience of telecommunications facilities throughout Australia. To strengthen the program ACCAN recommends the Department should:

- Amend the optional requirement to recognise third party funding co-contributions as part of clause 3.3.
- Provide further support to broker meaningful and ongoing partnerships with First Nations communities.
- Promote a data-driven approach to site selection through service reliability.
- Publish the program's outcomes, including information on successful locations, types of resilience upgrades, and how communities directly benefit from the program.

Third Party Funding Co-Contributions

ACCAN recommends that the guidelines be amended to remove the optional requirement that third party in-kind co-contributions "can be reflected in a reduction in the amount of funding the applicant seeks for a proposed Resilience Upgrade".¹ As previously noted in ACCAN's submission to the Peri-Urban Mobile Programs draft guidelines:

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.²

¹ Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Mobile Network Hardening Program – Round 2 Grant Opportunity Draft Guidelines', cl. 3.3. (Australian Government, 2023). 8.

² ACCAN, 'Consultation on the Peri-Urban Mobile Program – Grant Opportunity Guidelines'. (Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2021). 1.

Making this requirement mandatory will increase transparency and creates accountability in the relationship between the applicant and the third party.

Support for First Nations communities to broker meaningful and ongoing partnerships

ACCAN supports the program's emphasis on applicants proposing Resilience Upgrades for First Nations communities needing to demonstrate benefits for the local community.³ To further support the Department in brokering meaningful and ongoing partnerships with First Nations communities, ACCAN recommends that the program provide specific funding for a facilitator to work with the local community to ensure they benefit from the proposed Resilience Upgrades (as per clause 6.1.b).

Regarding applicants providing evidence of support from the relevant First Nations community, ACCAN recommends the Department provide guidance as to what form this should take. For instance, demonstrating support from the local First Nations community may encompass a one-page document that states the First Nations community's support for the Resilience Upgrade. Providing clear guidance on the type of evidence the Department requires further supports resource-constrained communities engage with the program. Clarifying what constitutes evidence of support will also help applicants understand what is expected of them and reduce confusion or misunderstanding for the local First Nations community.

Promote a data-driven approach to site selection through service reliability

ACCAN recommends the Department examine opportunities to use a data-driven approach to better support the selection of sites for Upgrade Resilience as part of the program. We suggest that the Department investigate whether service reliability data can be provided by applicants to inform an assessment of the relative merits of individual projects. We note that reliability data embedded in frameworks like the System Average Interruption Frequency Index (**SAIFI**) and the System Average Interruption Duration Index (**SAIDI**) used in the Energy sector may be an example of a system wide approach to assessing reliability.⁴ This data-driven approach would support transparency in how the Department builds the economic and core resiliency of Australia's telecommunications infrastructure in areas of high risk of natural disasters.

Make the program's outcomes publicly available

To further align the program with the *Commonwealth Grant Rules and Guidelines'* key principles of transparency and accountability, ACCAN recommends that the Department make the program's outcomes publicly available.⁵ The Department should publish a summary report of the program's outcomes, including information on successful locations, types of resilience upgrades, and how communities directly benefit from the program. To improve resilience in First Nations communities, the summary should report the number of First Nations communities that have supported applications and their success rates.

Publishing the program's success rate will help to strengthen public confidence in the Department. ACCAN further suggests the Department provide written responses to all unsuccessful applicants to

³ See clause 3.1 of the program.

⁴ SAIDI and SAIFI framework provides service reliability data on a "customers' average performance, assisting with identifying the areas of the network that need improvement, resulting in better customer type performance in clear customer segmentation." See, Energy Networks Association (ENA), 'ENA Service Standard Regulatory Policy and National Reliability Reporting Framework'. (ENA, 2006). 7.

⁵ See ACCAN, 'ACCAN submission Mobile Black Spot Program Improving Mobile Coverage Round Grant Opportunity Guidelines'. (Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 2022) 2-3.

further support transparency as to why their proposed Resilience Upgrade was not funded by the program.⁶

We thank the Department for the opportunity to comment on the program. 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.

⁶ Ibid 3.