



National Regional Roads Australia Mobile Program

Department of Infrastructure, Transport,
Regional Development, Communications, Sports
and the Arts

6 June 2025

Recommendations

This Submission recommends the Department:

1. Ensure proposals prioritising active sharing across all three national Mobile Network Operators (**MNOs**) receive higher funding allocations and merit-based assessment weighting, reinforced by enforceable service delivery commitments.
2. Introduce funding specifically for free, public Wi-Fi hotspots strategically located to enhance connectivity where mobile coverage is limited or affordability is a barrier.
3. Establish a Project Noticeboard enabling communities, local governments, and First Nations communities to nominate priority major roads and highways for coverage improvements.
4. Allow applicants to propose roads and highways not officially listed as eligible, provided proposals are supported by robust data or compelling community evidence, such as findings from the National Mobile Coverage Audit.
5. Consider actively supporting domestic mobile roaming arrangements to improve utilisation of existing infrastructure, especially in areas unlikely to attract competitive investment.
6. Mandate a minimum of 12 hours backup power at all funded sites, encourage the deployment of Stand Alone Power Systems (**SAPS**) for continuity during emergencies, and provide incentives for extending backup power to 24 hours.
7. Provide dedicated funding for essential ongoing operational costs such as infrastructure maintenance, community consultation, monitoring, and evaluation to sustain long-term consumer benefits.
8. Offer support for 50% of operational costs over five years for shared infrastructure, contingent upon transparent service-level agreements and regular public reporting on outcomes.
9. Introduce a public register listing all funded sites, clearly indicating the MNOs providing service, and embed enforceable performance milestones and penalties within grant agreements.
10. Include proposals leveraging the existing Optus-TPG MOCN arrangement, provided they clearly enhance service availability and consumer outcomes.
11. Implement ongoing monitoring of internet and mobile service affordability to assure that RRR consumers genuinely benefit from the National RRAMP initiative.

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ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services.

About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts (**the Department**) on the consultation on design features of the National Regional Roads Australia Mobile Program (**National RRAMP**).

ACCAN's submission outlines key recommendations to ensure the National RRAMP delivers reliable, equitable, and future-focused mobile coverage across regional, rural, and remote (**RRR**) Australia. We urge the Department to prioritise consumer outcomes through strong accountability measures and active infrastructure sharing.

Introduction

ACCAN welcomes the opportunity to provide feedback on the design of the National RRAMP. We support the National RRAMP's goal of providing new and improved multi-carrier mobile coverage on RRR highways and major roads in Australia. ACCAN also views multi-carrier mobile coverage on RRR roads as an important complement to the proposed Universal Outdoor Mobile Obligation (**UOMO**).

Reliable mobile connectivity is a fundamental service for people living, working, and travelling in RRR Australia. It supports public safety, access to government and emergency services, economic participation, and social connection. However, commercial investment has often been inadequate due to the high costs and limited returns from investment in these regions. Accordingly, for many communities in RRR Australia, mobile coverage remains inconsistent and unreliable, particularly along highways and major roads.¹

ACCAN supports the dual focus of the National RRAMP of addressing existing mobile coverage gaps and improving the capacity, service quality, and resilience of terrestrial mobile networks along major roads and highways.²

With robust program design and effective oversight, the National RRAMP has the potential to significantly enhance public safety, improve access to essential services, and promote digital inclusion for all Australians.

¹ Regional Telecommunications Independent Review Committee (RTIRC), *2024 Regional Telecommunications Review: Connecting communities, reaching every region* (Report, 2024) 58.

² RTIRC, *2024 Regional Telecommunications Review: Connecting communities, reaching every region* (Report, 2024) 7.

Responses to consultation questions

Design features of the National RRAMP

What is the need for terrestrial mobile coverage on regional and remote highways and major roads in the medium- and long-term?

ACCAN is pleased to see that our recommendation to the 2024 Regional Telecommunications Review to expand funding to support mobile coverage along RRR highways and major roads has been reflected in the announcement of the National RRAMP.³ Targeted investment in these critical road corridors is essential to improving safety, connectivity, and service access for people living in or travelling through RRR Australia. We encourage the Department to continue prioritising these transport routes in future rounds of mobile infrastructure funding, with a strong focus on enabling infrastructure sharing and ensuring long-term sustainability.

ACCAN stakeholders have consistently highlighted the ongoing importance of reliable terrestrial mobile coverage in RRR areas.⁴ In the medium- and long-term, coverage on RRR highways and major roads is critical for supporting access to Triple Zero (000), along with navigation, freight operations, tourism, and social connectivity. To maximise the benefit of this investment, ACCAN recommends that funding be directed toward projects that facilitate neutral hosting, enabling multiple mobile providers to share the same infrastructure.⁵ This approach directly responds to concerns raised by ACCAN stakeholders about being limited to a single provider in their area, which restricts choice and can impact service quality and access.

To what extent will Low-Earth-Orbit Satellites (LEOSats) and direct-to-device (D2D) technology meet this need over the medium- and long-term?

As noted in ACCAN's submission to the 2024 Regional Telecommunications Review, future mobile infrastructure funding must be flexible and responsive to the specific needs of local communities, as well as adaptable to emerging technologies.⁶ For example, advancements such as Low Earth Orbit satellites (**LEOSats**) and direct-to-device (**D2D**) mobile capabilities hold significant potential to enhance coverage in remote and hard-to-reach areas. While these technologies are still evolving, funding programs should be designed with the capacity to integrate innovative solutions as they become viable, ensuring long-term connectivity outcomes for RRR Australians.⁷

³ ACCAN, *2024 Regional Telecommunications Review* (Submission, RTIRC, 30 August 2024) 25.

⁴ RTIRC, *2024 Regional Telecommunications Review: Connecting communities, reaching every region* (Report, 2024) 58.

⁵ ACCAN, *2024 Regional Telecommunications Review* (Submission, RTIRC, 30 August 2024) 25.

⁶ ACCAN, *2024 Regional Telecommunications Review* (Submission, RTIRC, 30 August 2024).

⁷ ACCAN, *2024 Regional Telecommunications Review* (Submission, RTIRC, 30 August 2024) 25.

In the medium- to long-term, ACCAN considers LEOsats and D2D technologies to hold promise as complementary solutions that can address coverage gaps in RRR areas. However, these technologies are not yet widely available, affordable, or integrated into standard consumer devices, particularly for people on lower incomes. As such, ACCAN does not consider LEOsats or D2D to be standalone or replacement solutions in the foreseeable future. Instead, we recommend they be viewed as supplementary tools alongside continued and targeted investment in terrestrial mobile networks.

Furthermore, ACCAN considers domestic mobile roaming as an important mechanism to improve the utilisation of existing terrestrial mobile infrastructure in areas where infrastructure competition is unlikely to emerge. ACCAN believes that it may be timely to reconsider the role of domestic mobile roaming, particularly in light of emerging D2D technologies, and to explore how domestic mobile roaming could enhance competition and improve mobile connectivity outcomes.

To what extent will coverage at locations proposed under the National RRAMP support existing customers, or attract new customers, for MNOs?

ACCAN recommends that the broader public value of improved safety, better access to services, and increased competition should be the primary consideration of the National RRAMP. Therefore, ACCAN supports a model that focuses on public good and service equity over commercial return.

Is there merit in the National RRAMP also funding Wi-Fi hotspots at strategic locations along highways and major roads (as per Recommendation 2 of the 2024 Regional Telecommunications Review Report)?

ACCAN supports the inclusion of strategically located, public Wi-Fi hotspots as a high-impact solution to support connectivity for travellers, tourists, freight workers, and those unable to afford mobile data. These hotspots should be free, resilient, and prioritised in areas with no or low coverage. They can also serve as important points of access during emergencies. In line with Recommendation 2 of the 2024 Regional Telecommunications Review, public Wi-Fi infrastructure should be considered a complementary tool to improve coverage outcomes under the National RRAMP.

How can the Government best preference and prioritise active sharing through the design of the National RRAMP?

ACCAN supports the Department's prioritisation of active sharing as a core principle underpinning the National RRAMP. To effectively incentivise and sustain active sharing outcomes, ACCAN recommends that the Department provide higher levels of capital and operational funding for proposals that demonstrate genuine active sharing arrangements involving multiple MNOs.

Additionally, the Department should implement a clear and transparent merit-based assessment framework, with explicit weighting criteria that reward proposals demonstrating active sharing commitments and collaboration among all national MNOs.

To promote transparency and ensure the effectiveness of publicly funded infrastructure, ACCAN advocates for robust public reporting requirements. Information regarding network performance and reliability at funded sites should be regularly disclosed to enhance accountability and consumer trust.

Finally, binding service delivery commitments should be embedded within grant agreements, clearly stipulating multi-carrier service delivery expectations, coverage obligations, and enforceable milestones. These commitments should be complemented by penalties for non-delivery to ensure compliance and genuine multi-carrier outcomes for RRR consumers.

Upgrades or installations

The Government is considering funding upgrades to mobile coverage infrastructure, including radio equipment, installation costs, strengthening towers, increasing power capacity, or integration projects associated with active sharing. Would these upgrades provide sufficient incentive for national MNOs to share existing infrastructure?

ACCAN considers funding proposed upgrades to mobile coverage infrastructure, including radio equipment, installation costs, strengthening towers, increasing power capacity, and integration projects associated with active sharing as an important step toward encouraging infrastructure sharing. However, ACCAN notes that commercial disincentives for MNOs to allow competitors access remain significant, particularly in areas where return on investment is low or where a provider already holds a coverage advantage.⁸

To ensure these upgrades lead to genuine multi-carrier outcomes, incentives must be tied to enforceable service commitments, not just infrastructure readiness. Further, the funding model should provide additional weighting or funding uplift for active sharing, which delivers the greatest consumer benefit and aligns with the National RRAMP policy intent.

ACCAN recognises that multi-carrier investment models and active sharing arrangements involve complex considerations for MNOs. Although the National RRAMP can be structured to provide significant financial incentives for active sharing, ACCAN notes there are additional technical and operational factors influencing MNOs' investment decisions that also need careful consideration.

For instance, previous reviews of multi-carrier investment have demonstrated the importance of site location for ensuring effective infrastructure coverage.⁹ The economic feasibility of investing in any specific site can be influenced by factors such as the site's proximity to existing network infrastructure, its relevance to an MNO's customer base, and the suitability of available spectrum for

⁸ ACCAN, *Effectiveness of telecommunications facilities and tower access regulations* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 12 April 2024).

⁹ Parliamentary Inquiry, *Connecting the country: Mission critical, Inquiry into co-investment in multi-carrier regional mobile infrastructure* (House of Representatives, Standing Committee of Communications and the Arts, 2003).

service delivery.¹⁰ Therefore, it is essential that the Department clearly identifies these factors and evaluates how the National RRAMP might practically address or mitigate them.

Additionally, ACCAN recommends that the Department examines strategies employed internationally to resolve RRR mobile coverage challenges through active and shared investment approaches. Examples such as New Zealand's Rural Broadband Initiative could offer valuable insights and potential lessons applicable to Australia's context, enabling more effective program design and improved outcomes.¹¹

What other kinds of activities, infrastructure and costs support active sharing, and may be considered for funding?

ACCAN recommends expanding the scope of eligible costs to include:

- Ongoing maintenance arrangements required to sustain shared infrastructure over time.
- Community consultation and engagement, particularly where there are First Nations communities or areas with historically poor coverage.

These costs should be considered to improve public value from funded sites.

Should proposals for new infrastructure providing services from Optus and TPG, that leverage Optus and TPG's MOCN deal, be considered eligible?

ACCAN supports proposals for new infrastructure that leverage the existing MOCN arrangement between Optus and TPG being considered eligible under the National RRAMP. Such proposals can efficiently expand coverage and offer consumers increased service availability in RRR areas. However, ACCAN strongly recommends that these proposals should aim to prioritise inclusive, multi-carrier solutions involving all national MNOs to ensure genuine consumer choice and robust service resilience.

¹⁰ Parliamentary Inquiry, *Connecting the country: Mission critical, Inquiry into co-investment in multi-carrier regional mobile infrastructure* (House of Representatives, Standing Committee of Communications and the Arts, 2003) 28 [2.74].

¹¹ Government of New Zealand, *Rural Broadband Initiative: New Zealand Government and industry collaboration* (Report, 2012).

Are there market or technical issues that may impact the construction of new mobile coverage infrastructure, or infrastructure upgrades, on highways and major roads in regional and remote areas? If so, what are the impacts?

ACCAN recognises a number of barriers that may impact delivery in RRR areas, including:

- Site acquisition and construction costs.
- Delays in permitting or approvals.
- Backhaul availability.
- Uncertainty about future network models, such as the role of LEOsats.

To address these issues, the National RRAMP should include flexibility in funding scope, strong coordination with local authorities and First Nations communities, and additional support for backhaul upgrades where needed.

Multi-carrier coverage

How can the Government best facilitate cooperation between national MNOs during the application stage to ensure multi-carrier outcomes are proposed and delivered?

What alternatives are there for applicants to demonstrate, to Government, that multi-carrier outcomes will be delivered (as an alternative to sharing commercial agreements)? Any alternative would need to be robust and demonstrate intent.

ACCAN has no further comments.

Eligible roads

The National RRAMP aims to provide multi-carrier mobile coverage where currently there is no coverage, or coverage from only one provider. With this in mind: are there any particular roads the Government should consider for eligibility; are there any roads that are not considered viable for investment?

ACCAN recommends the National RRAMP should prioritise roads with known safety risks, key freight or tourism routes, those regularly used by First Nations communities, and roads frequently identified by RRR communities as mobile black spots. While not all roads will be viable for investment due to technical or environmental constraints, ACCAN suggests the Department consider alternative solutions, such as satellite-supported services, to ensure RRR communities are not left without connectivity.

Should applicants be permitted to propose solutions on roads that are not on the list of eligible roads, provided a good case can be made (for example, using published data from the National Audit of Mobile Coverage)?

ACCAN supports flexibility for applicants to propose solutions on roads not included on the list of eligible roads, provided a strong evidence-based case can be demonstrated. This is particularly important to ensure the National RRAMP remains responsive to community-identified coverage gaps that may not be captured through top-down selection processes. The use of objective data sources, such as the National Audit of Mobile Coverage and local government or community submissions, should be encouraged to support these proposals. This approach will help ensure the National RRAMP delivers the most significant public benefit by addressing mobile coverage needs that may otherwise be overlooked in the official list of eligible roads.

To further support equitable and transparent identification of need, ACCAN recommends the Department consider establishing a Project Noticeboard, similar to the approach used in the First Nations Community Wi-Fi Program.¹² This Noticeboard could allow community representatives, local governments, and state and territory authorities to propose priority locations for consideration. Community members should also be encouraged to engage with their local representatives to advocate for known coverage of mobile black spots during the application window. To align with the National RRAMP timeline, the Project Noticeboard could close approximately two weeks after the National RRAMP opens for applications, allowing applicants time to incorporate suggestions into their proposals.¹³

Strategic locations

In addition to the types of locations listed above, are there any other Strategic Locations which could be considered?

ACCAN supports the inclusion of strategic locations as a requirement for eligible projects under the National RRAMP and welcomes the broad definition provided, such as rest areas, truck stops, campgrounds, service centres, EV charging stations, tourist sites, and other points of interest. These are locations where people are likely to stop and use their mobile devices, and where connectivity can directly improve safety, access to services, and travel experience.

¹² Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Project Noticeboard open for the upcoming First Nations Community Wi-Fi program' News (Web Page, 4 December 2024) <<https://www.infrastructure.gov.au/departments/media/news/project-noticeboard-open-upcoming-first-nations-community-wi-fi-program>>.

¹³ See, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 'Project Noticeboard open for the upcoming First Nations Community Wi-Fi program' News (Web Page, 4 December 2024) <<https://www.infrastructure.gov.au/departments/media/news/project-noticeboard-open-upcoming-first-nations-community-wi-fi-program>>.

To strengthen the accountability and impact of the National RRAMP, ACCAN recommends greater transparency in how strategic locations are identified and selected. Publishing the methodology and criteria behind the Department's database of strategic locations would help build trust in the process and ensure that it reflects consumer needs.

Are there any other indicators which can be used to identify a Strategic Location, noting the policy intent of the National RRAMP (for example, distance from a population centre, tourism data, or correspondence from local residents / institutions)?

ACCAN recommends that additional indicators that should be used to identify strategic locations include:

- Distance from the nearest population centre (to reflect isolation risk).
- Tourism and travel data.
- Frequency of public use.
- Community input, such as feedback or correspondence from local governments, First Nations communities and organisations, along with RRR service providers and community members.

Other conditions for grant funding

We are interested in your thoughts on the potential funding models:

- To what extent will they incentivise multi-carrier solutions?
- To what extent will they deliver the policy intent of the National RRAMP?
- Are there any further costs which should be eligible for funding?
- Would a grant of 50% of eligible operational expenses for five years incentivise national MNOs to allow other national MNOs onto their infrastructure?
- Does the market incentivise use of MNIP's infrastructure?
- Are there any risks or potential unintended outcomes associated with the proposed grant funding structures?

ACCAN supports a grant funding model that incentivises multi-carrier participation, ensures long-term service delivery, and maximises public benefit, especially in areas where there is little to no commercial incentive to invest.

Of the proposed models, ACCAN strongly supports funding arrangements that prioritise active sharing among all three national MNOs, as this aligns best with the policy intent of the National RRAMP. The goal is to increase mobile coverage, consumer choice, and network resilience in RRR areas. Providing full capital cost coverage for projects that facilitate active sharing among all MNOs is an effective approach to overcoming commercial barriers and is likely to yield the greatest benefits for consumers in underserved regions.

The tiered funding model also serves as a practical means to encourage cooperation between carriers. ACCAN supports including third party co-contributions where appropriate, as long as this does not transfer the funding burden onto local governments or communities that may already face resource constraints.

ACCAN supports the proposed operational expenditure incentive of covering 50% of eligible operational costs for shared infrastructure over five years as this could encourage ongoing collaboration between MNOs. However, ACCAN recommends that such incentives be contingent upon transparent service-level agreements and public reporting on service delivery to ensure that shared infrastructure provides tangible benefits to end users. Additional guidance may also be necessary to prevent this funding from unintentionally entrenching market dominance or limiting future competition.

Regarding Mobile Network Infrastructure Providers (**MNIPs**), ACCAN notes that while MNIPs can help facilitate shared infrastructure, the ACCC has found they may prioritise maximising returns from anchor tenants over promoting broader competition.¹⁴ This dynamic can undermine incentives for multi-operator access, particularly in areas with limited competition. To address this, ACCAN recommends that all government-funded infrastructure be subject to minimum consumer safeguards and transparency requirements, to ensure equitable access and maximise public benefit. ACCAN recommends that grant funding also be made available to support essential enabling costs, such as:

- Community consultation and engagement activities, particular in First Nations and remote communities.
- Power resilience infrastructure that includes a 12-hour minimum backup power mandate, incentives for 24-hour capacity, and support for SAPS to ensure continuity during emergencies.
- Monitoring and evaluation systems to assess consumer impact and the performance of funded sites over time.

Potential risks and unintended consequences of the proposed funding structures include:

- Prioritisation of commercially viable sites over high-need locations unless clear eligibility criteria and assessment weighting are established.
- Inconsistent service delivery if MNOs exit agreements or shift priorities during the National RRAMP.
- Limited benefit to consumers if funding supports infrastructure without ensuring actual multi-carrier retail service availability.

To mitigate these risks, ACCAN recommends incorporating strong accountability measures into grant

¹⁴ ACCC, *Regional mobile infrastructure inquiry* (Final Report, July 2023) 64.

agreements, including enforceable commitments to multi-carrier operations, performance reporting, and penalties for non-delivery.

Operating requirements

What should the minimum resilience requirements be for mobile infrastructure under the RRAMP?

ACCAN supports the proposed 10-year operating requirement for funded infrastructure and believes that all MNOs involved in a successful application should be contractually obligated to provide services for the entire duration of this period. This long-term commitment is crucial for ensuring that public investment in mobile infrastructure delivers sustained benefits to RRR consumers.

Given the increasing frequency and severity of natural disasters and extreme weather events, network resilience must be a core requirement for any funded infrastructure. ACCAN strongly endorses the inclusion of a minimum of 12 hours of backup power for macro cell base stations. We recommend that this standard be extended across all infrastructure types where technically feasible, including small cells and upgrades. If a full 12-hour backup is not practical, applicants should provide clear justifications and alternative resilience measures to ensure that reliability is not compromised.

Building on ACCAN's recommendations made in the 2024 Regional Telecommunications Review, we encourage the Department to explore the use of SAPS as part of the National RRAMP-funded infrastructure.¹⁵ Ensuring 24-hour backup power through SAPS would significantly enhance the resilience and reliability of mobile networks in RRR areas during extended power outages.

Are there additional operating requirements that should be considered?

To further strengthen the long-term reliability and consumer benefit of National RRAMP-funded infrastructure, ACCAN recommends the inclusion of the following additional operating requirements:

- Regular network testing and maintenance obligations, with transparent public reporting.
- Clear escalation protocols for service outages, including timeframes for restoration.
- Reliability testing for Triple Zero (000) services to ensure public safety access is maintained at all times.
- Data on service availability and uptime should be made publicly available to promote accountability and transparency.

Additionally, in scenarios where no providers initially express interest in sharing infrastructure, ACCAN recommends the Department mandate open access conditions. This will require the funded infrastructure to be accessible to other MNOs if they decide to service the area in the future, maximising the public value derived from government investments.

¹⁵ ACCAN, *2024 Regional Telecommunications Review* (Submission, RTIRC, 30 August 2024) 38.

A high standard of operational reliability is essential for consumer safety and connectivity, as well as for maintaining public trust in government-led RRR telecommunications initiatives. Furthermore, ACCAN supports a minimum legislated broadband speed of 100 Mbps for communications consumers, with effective passthrough mechanisms to ensure consumers can take advantage of the more reliable connection that high-speed broadband enables.¹⁶ This reflects current usage patterns, supports multiple devices, and aligns with recent improvements in fixed wireless performance.

Conclusion

The National RRAMP provides a vital opportunity to improve mobile connectivity across RRR Australia. To deliver genuine public benefit, the National RRAMP must prioritise active sharing between all three national MNO, with clear service delivery commitments and strong accountability.

Terrestrial mobile coverage remains essential for safety, access to services, and participation in daily life, particularly along key transport routes. While emerging technologies like LEOsats may offer future support, they are not yet a substitute. By centring equity and reliability, the National RRAMP can help close the connectivity gap and deliver lasting benefits to underserved communities.

We thank the Department for the opportunity to comment on the National RRAMP. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact Dr Amelia Radke, Senior Policy Adviser, at amelia.radke@accan.org.au.

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. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.

¹⁶ ACCAN, *Statutory infrastructure provider regulated broadband speeds* (Submission, Department of Infrastructure, Transport, Regional Development, Communications and the Arts, 28 May 2025).



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