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The Manager
Mobile Coverage Programme
Department of Communications
GPO Box 2154
Canberra ACT 2615
mobilecoverage@communications.gov.au

Dear Madam/ Sir

Re: Mobile Coverage Programme Discussion Paper

On behalf of the Regional Development Australia Townsville and North West Queensland (RDA) Committee, I write to congratulate the Government on addressing mobile communication issues in regional Australia and provide comments on the above Discussion Paper.

Background to RDA's Interest in Communications Infrastructure and Access
Regional Development Australia is an established network of 55 Committees across Australia made up of local community leaders who are volunteers to champion the development of long-term sustainable communities. (Refer to www.rda.gov.au)

The Regional Development Australia Committee for Townsville and North West Queensland (RDA) is an incorporated not-for-profit association and has twelve ministerially appointed members. Funding is provided by the Federal Government and in-kind support is provided by the Queensland Government. The Committee's purpose is to achieve a prosperous, sustainable, cohesive and liveable region. Our region covers 15 local government areas of Boulia, Burdekin, Burke, Carpentaria, Charters Towers, Cloncurry, Doomadgee, Flinders, Hinchinbrook, McKinlay, Mornington Island, Mount Isa, Palm Island, Richmond and Townsville over 449,190 km2, accounting for approximately a quarter of Queensland's total land mass. (Refer to www.rdanwq.org.au)

RDA has developed and regularly updates a Regional Roadmap which informs the Federal and Queensland Governments of the regional priorities that need to be addressed based on the Council of Australian Governments (COAG) Regional Economic Development Framework. RDA works with partners across the region to progress priorities that support the long term vision. (Refer to http://www.rdatanwq.org.au/regional-roadmap)

Communications Infrastructure is a Transformational Priority for our region
The Townsville and North West Queensland region contributes strongly to the national economy as a very significant mining, grazing and agricultural area with the majority of product going to export markets. Tourism and services are also very important for their economic and employment contributions. However, economic and social infrastructure is lacking or in poor condition in much of the rural and remote parts of our region and Australia more broadly. This is particularly the case with communications infrastructure.

In our list of Transformational Engine Starter Priorities, Communications infrastructure is ranked highly. "Communications improvements across the region including mobile and high speed broadband access – this will provide (1) residents, in particular those in rural and remote areas, with access to health, education and other online services and (2) industry with access to productivity improvements and markets."

We recently made the following points to the ACCC regarding Domestic Transmission and they are relevant in the issue of mobile coverage.

Access to communications infrastructure and services is a right for those in rural and remote areas and is arguably even more important for economic development than in cities. We believe communications infrastructure is a powerful enabler for developing long term sustainable communities, greater equity amongst communities and individuals in the delivery and access to services, and new opportunities for employment and social connectedness. Critical to this success is the connectivity to and between rural and remote communities such as those in North West Queensland that frequently rely upon regional city hubs for health, education, transport, freight and other services. Real time interaction can only be as good as the lowest common denominator speed so equal access to fibre optic cable in as many locations as possible will enable high speed broadband to make a positive impact in areas such as health, education and government service delivery and business to business communications. High speed broadband gives all levels of government an opportunity to ensure our rural and remote areas are not severely disadvantaged.

RDA understands that the cost of communications transmission is an impediment to increasing mobile coverage in rural and remote areas. Arguments put forward to us suggest that regional consumers are denied competition and choice because the high cost of monopoly transmission (backhaul services) makes expanding mobile coverage too expensive. The price charged for backhaul/transmission has been identified as one of the most significant roadblocks to the expansion of mobile coverage and competition to regional Australia.

We asked the question, will the ACCC support the entrenchment of a communications divide between rural and remote-based residents and city-based residents or will the ACCC support each Australian in a fair and transparent way by opening up competition? Competition can be achieved through declaring pricing regimes for transmission services (or setting up an independent owner/ operator / wholesaler of transmission). The ACCC should intervene on pricing for monopoly transmission services to ensure an accurate reflection of cost. At present the price of backhaul is multiples above cost and expanding coverage is cost prohibitive.

The ACCC must develop a more effective pricing model that accurately reflects the costs of accessing existing backhaul infrastructure. This will lead to greater investment in regional coverage and increased competition that will benefit all Australians – not only those living in rural and remote areas, but all government departments, agencies, businesses and visitors who engage with residents, councils and businesses in rural and remote Australia.

Responses to Questions for which we would like to provide input

1. We would recommend that always the best and latest standards are used and applied to ensure no lag in capacity to service new and emerging technologies and growing demand.

2. Although we are not technical experts, we recommend that there be a minimum Australian standard set as the baseline acceptable level to ensure good mobile services and the reduction of the city vs country divide.

3. Ideally infrastructure is owned and operated by an independent entity to provide equitable access and pricing to retailers to encourage private sector competition.

4. Nil response

5. Yes

6. Yes, with transparency

7. Yes

8. Yes

9. Nil response

10. Yes, if there are independent contractors operating the infrastructure.

11. No, as there will be various situations that will need individual review and solutions for the best way to operate and to achieve the best outcomes.

12. Nil response

13. Yes

14. Nil response

15. In the case of tourism accommodation data, we note that in regional areas this will be unreliable as many tourists will be staying in non-standard accommodation setting such as camping grounds. This is particularly the case with large events such as the Dirt 'n' Dust in Julia Creek for which the city fills up and overflows with tourists camping at show grounds.

16. If reliable data can be used, the number of vehicle movements and vehicle accidents on a relevant road would be important criteria for assessing the value of mobile services to emergency services situations. Population served will also be important.

17. Yes, refer to local tourism organisations and Councils for data on special events that require special accommodation set ups.

18. There is an excellent opportunity for collaboration on infrastructure such as towers but this must be addressed in very early stages to achieve efficient, effective outcomes.

19. NBN Co can build and operate the infrastructure where the private sector will not invest.

20. Local roaming must be taken into consideration. As before, transparent equity of access is important.

21. They must cut down the silos and communicate with each other in early development stages.

22. Sharing of infrastructure such as towers could create efficiencies.

Improving access to mobile communications services in regional Australia is urgent and critically important from economic, social, community, servicing and equity perspectives. We appreciate your interest and drive for this programme.

I would be pleased to expand on any comments or answer any questions you may have and can be reached on 0429 468 606 or by email at Manfred@harboursat.com.au alternatively you can make contact with our Chief Executive Officer Ms Glenys Schuntner on 07 4760 1612 or at ceo@rdanwq.org.au. My RDA Committee and I look forward to further engagement in the roll out of your programme.

Yours sincerely

Paul Woodhouse
Chairman
Regional Development Australia
Townsville and North West Queensland Committee