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AMTA Submission

Australian Competition & Consumer
Commission

Infrastructure Record Keeping Rules



About AMTA

The Australian Mobile Telecommunications Association (AMTA) is the peak industry body representing Australia's mobile telecommunications industry. Its mission is to promote an environmentally, socially and economically responsible, successful and sustainable mobile telecommunications industry in Australia, with members including the mobile network operators and service providers, handset manufacturers, network equipment suppliers, retail outlets and other suppliers to the industry. For more details about AMTA, see <http://www.amta.org.au>.



Introduction

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to respond to the ACCC's consultation on infrastructure record keeping rules.

AMTA notes that the ACCC has made several changes to reporting requirements over the years and that such changes will add to the compliance costs of record-keepers. Prescriptive requirements can also have the effect of imposing a burden in terms of the creation or compiling of records that would not otherwise be made or kept except for this reporting obligation. We note that this consultation relates solely to the imposition of additional requirements, rather than any streamlining or removal of obligations around reporting.

Further, we note that the consultation paper does not explain the ACCC's purpose in requesting these changes, and would like to understand how the ACCC proposes to use the additional data being requested.

We have responded to the questions relevant to the Mobile Network Operators (MNOs) from the consultation paper below. We note that Communications Alliance will also be making a submission and will likely respond to some of the other questions that are relevant to their membership.

Responses to questions

Reporting on end-user equipment

4. Should relevant record-keepers be required to provide information on the location of the end-user's end of the CAN? Are the proposed amendments to the RKR appropriate to achieve this?

This proposed requirement does not have a compelling justification in terms of any policy rationale when it comes to services provided by MNOs, including fixed wireless access services and providing location information for these services would impose a regulatory burden without clear value or purpose.

AMTA strongly suggests that mobile services, including fixed wireless access should be excluded.

Mobile infrastructure

5. Do you have any comments on the requirement for relevant record keepers to provide a single coverage map for each mobile technology in operation?

AMTA submits that MNOs should not have to develop or create maps simply to meet the requirements of the RKR, so unless the MNOs already has single coverage maps for each mobile technology in operation they should not be required to provide single maps. A coverage map that includes coverage information for each type of mobile technology in operation should be sufficient.

6. Do you have any comments on the requirement for relevant record-keepers to report both outdoor and external-antenna mobile coverage? Are the definitions of outdoor coverage and external-antenna coverage in the draft Rules at Attachment A correct?

AMTA understands that this information is useful from a consumer perspective and the information is available as outlined below. We are not sure of the purpose of the ACCC's requirement for the information so not convinced that it should be included as a requisite for this reporting purpose.

In 2018 AMTA members and mobile network operators, Optus, Telstra and VHA (now TPG Telecom) implemented several changes to improve the comparability of coverage map information across networks for customers. The network operators agreed to use the following terminology to describe the following three levels of coverage to customers (see table below).

These three levels can be applied to various types of coverage e.g. 3G/4G/5G and this can be shown on coverage maps. Coverage maps may also indicate coverage based on the customer's device type.

This initiative was focused on ensuring consumers would be better placed to compare available information. Coverage, however, remains a key differentiator for customers when choosing a network provider and for that reason, network planning and design, along with the development of coverage maps remains commercially sensitive.

Levels of coverage	Explanation
Level 1 INDOOR	This is the type of coverage a customer can expect when using a device indoors with a quality of reception predicted for that location and factoring in typical building penetration losses of the area. Typically building penetration losses that will apply will vary depending on the urban density of the location i.e. dense urban areas have higher losses than suburban. Building penetration losses can also vary considerably based on building materials used e.g. brick, tin, timber as

	well as size and finishing of windows. Metal tinted windows, for example, will increase losses.
Level 2 OUTDOOR	This is the type of coverage and quality of reception a customer can expect when using a device outdoors with typical handheld use, based on an elevated upright standing, head height position. Factors that will impact on predicted coverage will include local environment e.g. local clutter, vegetation, topography of the area, as well as personal variables such as how the device is held relative to the head and the direction facing.
Level 3 EXTERNAL ANTENNA	This is the type of coverage expected when a device is augmented using an external antenna or other coverage extension device that utilises an external antenna. The predicted quality of coverage will be based on a typical small omni-directional external antenna that can be readily vehicle mounted, at a height consistent with top of vehicle. Note that larger higher gain antennas and increasing antenna height can increase range of coverage.

MNOs should therefore be able to report on both outdoor and external-antenna mobile coverage, however, as per our response to question 5 above, this should not be a requirement to provide separate maps for each type of coverage.

7. Should record-keepers be required to report on the assumptions they use to calculate coverage for mobile networks? If not why not?

No, AMTA does not agree that MNOs should be obligated to report on the assumptions they use to calculate coverage for mobile networks.

MNOs use proprietary models and maps to calculate coverage. This is a significant investment on the part of MNOs to ensure that they build a network that can deliver quality and performance. Networks are not all the same. MNOS may be delivering services on different radiofrequency spectrum bands and may be offering different product suites with various capacities and features implemented. Further, assumptions are not the key driver of differences in coverage, the key drivers include barriers to signal penetration i.e. topography, environment as well as both carrier and customer specific factors. The assumptions made by MNOs in calculating coverage maps will always be specific to a particular network and not easily comparable.

8. Do you have any comments on the requirement for the relevant record-keepers to report the type of cell operating at each mobile site? Is the cell-type classification proposed in the draft adequate?

AMTA notes that this information is already available from the RFNSA, however, MNOs will all vary in how they classify cell type and there is no formal, standard definition for a 'small cell'. Not all MNOs will deploy the same types of cells and classification will vary depending on choice of technology, equipment and vendor. We therefore question the utility of requesting this information and note that the real relevance is the coverage that is achieved, not the cell type. Providing cell type information amounts to an impost without any value.

Aggregation of reports and explanation of maps

9. Should record-keepers be required to provide one individual file representing the national geographic extent of their networks? Are the proposed amendments to the RKR appropriate to achieve this?

No, AMTA does not support a requirement to provide one individual file representing the national geographic extent of a network. Some MNOs may have a national network and others may have smaller, private networks across various States. It would be quite reasonable for such an operator to provide several files representing several small networks, rather than requiring them to consolidate this information. However, we understand that some MNOs are able to provide an individual file and that this may well be more convenient to the ACCC than receiving several files.

Contact:

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