

Reference: KS:EB
3 August 2022

Mr Grahame O'Leary
Director- Regional Mobile Infrastructure Inquiry
Mobiles, Transmission and Consumer Branch
Australian Competition and Consumer Commission

Dear Mr O'Leary,

Alpine Shire Council- Submission to the Regional Mobile Infrastructure Inquiry

The Alpine Shire is located in the Hume Region of North East Victoria. It has experienced many bushfire events, including the Black Summer bushfire event of 2020.

Our Local Government Area (LGA) has a 'usual resident' population of 13,251 people (2021, ABS) however our enumerated population expands rapidly over peak holiday periods. Quantitative research to date, derived from the National Visitors Survey, indicates our region receives an estimated 516,000 domestic overnight visitors annually. Our short stay accommodation bed base is 25,000. This excludes the Alpine Resorts of Mount Hotham and Falls Creek. Essentially, on any given day, during busy holiday periods, our overnight population can exceed 38,000 people. This figure paired with the day visitor market (estimated to be 141,000 visitors per annum) and our increasing reliance on telecommunications technology has led to a service that is grossly inadequate to support our escalating needs. The population of each of our townships grew throughout the COVID19 pandemic as many city people made the "tree change". The 'Victoria in Future' population and household projections that underpins many government decisions relating to forecast demands, whilst adequate for urban and peri-urban localities with clear growth corridors and strong strategic planning policy, underestimates the resident population of our region and fails to contextualise the pressures on our community. Our region is in need of services that are suitable considering the actual population growth, for the visitor to the area and to support business. As a result of the pandemic and added to the number of people who have moved to the area and can do their job from home, a number of businesses have adapted their business to be online.

Mobile Black Spot Program

Over the years Council has put forward locations of priority for the *Mobile Black Spots Program*. As each funding program is announced, Council nominates locations that fall within the criteria and are in the best interest of public safety. Locations include remote popular camp grounds, heavily visited tourist attractions including river locations, areas that have come under emergency event threat, through to townships isolated by inadequate reception. We acknowledge the success of the program and its capacity to deliver the physical infrastructure.

However, we are perplexed when it comes to successful tenderers and the lack of consistency with providers which leads to further fragmented and dysfunctional service removed from what should be improved services and outcomes for stakeholders. A service not fit for purpose and not meeting the expectations of recipients. Your discussion paper identified the model of a 'neutral host', with reference to the geographic distribution of mobile sites, which the Alpine Shire Council would like to acknowledge and support. We see this as applicable to all rural and regional locations and welcome the dexterity of infrastructure. Further to the neutral host adoption we would also like to highlight the lack of engagement successful tenderers currently have with community and encourage the inclusion of engagement with local stakeholders as a metric in delivery plans. This would enable rural and regional localities to influence and tailor infrastructure fit for purpose providing a clearly identifying needs.

Many blackspots remain across the Shire. Council has recently engaged Gravel Road to provide a piece of work to identify where blackspots remain and prioritise locations against the set of criteria.

We believe decision makers need to be informed and be provided with crucial local information for positive outcomes. Beyond accessing a public generic coverage map for infrastructure stakeholders are not garnered with adequate information for make informed decisions including the size of the tower and estimated coverage. These decisions rest with the tenderer and omit local knowledge. An example of a missed opportunity was the addition of a telecommunications tower in Nug Nug. This tower needed to service the nearby water body, Lake Buffalo, enabling recreational users to make contact in the case of an emergency without having to leave the area for reception. The addition of the tower did not achieve the desired outcome. Furthermore, due to the Shires mountainous surrounds, valley location and tree canopy coverage is hard to predict but key to ensure the desired outcomes.

The township of Bright is renown as a popular holiday destination. There are 15,000 of the total 25,000 holiday beds located in and immediately around Bright. Current Telstra infrastructure does not have capacity to cope with demand over the busy periods. Council (and others) have raised this issue with Telstra over many years and on many occasions. There has been no resolution to this issue. No access to telecommunications, due to lack of capacity in the event of a natural disaster and emergency is significant.

Payment Gateway

Further to the key issues identified in the inquiry, Council would like to explicitly highlight the impact of poor telecommunications and the affects this has on local business. For our local businesses who increasingly rely on technology for the payment of goods and services a reliable and available service is critical. Unfortunately, the provisions in our region, particularly the township of Bright have proven time and time again they are erratic and unreliable. It is not a matter if they will fail it's a matter of when.

Thank you for inviting submissions to the inquiry. Reliable telecommunications is identified as a priority for Council and by our business and resident community. I am more than happy to provide any further detail that may be required or to be part of a discussion.

Yours sincerely,



Elaine Burridge

Director Assets (Acting)