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ALGA Submission to the inquiry by Australian Competition and Consumer Commission into Regional Mobile Infrastructure

Thank you for the opportunity to make a submission to the Australian Competition and Consumer Commission's inquiry into Regional Mobile Infrastructure.

The Australian Local Government Association (ALGA) is the national voice of local government in Australia, representing 537 councils across the country. In structure, ALGA is a federation of State and Territory Local Government Associations. This submission should be read in conjunction with any separate submissions received from State and Territory Associations as well as individual councils.

Key points

ALGA encourages the activation of mobile roaming during disasters. Providing increased connectivity during emergencies will increase the resilience and recovery of communities and save lives.

ALGA supports a trial of mobile roaming in emergencies, which could be used to inform a national model. ALGA and Associations would be pleased to assist in identifying trial sites and encourage the development of a robust, transparent and evidence-based methodology for determining sites.

There are additional connectivity challenges faced by rural, regional and remote communities in emergencies due to limited telecommunications infrastructure and limited options for their mobile service provider. Mobile roaming is not a solution in areas where there is only one provider and consideration of alternate solutions, as well as further investment in these regions, is essential to improve their connectivity and preparedness for disasters.

ALGA also supports further investigation of the neutral host colocation model.

Introduction

There is no doubt that access to reliable communication systems during disasters can save lives and perform a critical role before, during and after a disaster.

Mobile roaming, where other available cell networks are available, would be worthwhile even if it assists a small percentage of the population and prevents one death. Any level of communication is preferable to no communication in a disaster

The problems caused by communications outages during and after disasters has been an ongoing problem (eg. cyclones) but was frequently raised as an issue by councils during the 2019-20 bushfires and 2022 floods. The need for reliable communications during disasters has also been raised by several inquiries, royal commissions and the Regional Telecommunications Independent Review Committee.

A lack of reliable communications infrastructure affects community's safety, access to emergency services, access to safety and evacuation information, communications between State Emergency Services personnel, access news about road closures, as well as resulting in the complete isolation of communities during disasters.

The previous ACCC inquiry into mobile roaming decided not to declare a mobile roaming service as it is not satisfied that declaration would promote the long-term interests of end-users and would result in less investment in infrastructure, particularly in unviable regional areas. However, the competitive market has not developed in the intervening years since the ruling. Communities in regional and remote Australia remain disadvantaged.

Local government supports a trial of mobile roaming to inform how roaming could be utilized in the event of an emergency. The Local Government Association of Queensland has indicated in its submission that it would be pleased to assist in identifying appropriate local government areas in Queensland. Similarly, other Associations would be willing to assist in providing appropriate sites.

Local government also supports further investigation of the neutral host colocation model.

Mobile roaming during disasters

The benefits of mobile roaming during disasters are clear. Access to communications before, during and after disasters assists first responders, State Emergency Services personnel, volunteers, the community and the families of people affected.

Without digital connectivity during prolonged disasters the local economy simply ceases to function. Isolated communities cannot use ATMs, shops, petrol bowsers or access government services until the repairs take place.

Allowing roaming would serve to fill in the gaps in connectivity that may be caused by towers of any carrier being destroyed or de-powered in the event of a disaster or system outage. It would

increase connectivity for SES and other emergency services who may not be with one specific carrier, as well as providing a more expansive system of redundancies which uses all local towers working.

Any level of increased connectivity in the event of an emergency is a desirable outcome. If only the barest minimum of service could be accommodated, for example only SMS rather than voice, roaming could increase connectivity and save lives.

In regional, rural and remote areas, where lack of telecommunications infrastructure already limits access to reliable communications, the problem is amplified. People have limited options for their mobile service provider, often having only one network provider, so there is no market competition or redundancy, and no commercial pressure to provide better services. Consideration of alternate solutions (eg. NBN satellite wifi mesh) and additional investment is required.

For example, in the Northern Territory, Telstra is the primary provider and there is little telecommunications competition outside the main towns. Where telecommunications infrastructure fails following a disaster, the Northern Territory Government deploys mobile satellite systems for first responder use only. Telstra and NBN are engaged to provide mobile small cell and/or satellite solutions for community communications. There are obvious limitations to these solutions in the case of disasters such as severe cyclones.

Significant additional investment is required in these areas, particularly to address remaining mobile black spots. ALGA welcomes programs such as the Mobile Black Spots Program, the Connecting Regional Australia Initiative, including the Regional Connectivity Program.

Disasters such as the Black Summer Bushfires, the recent flooding events in 2022, and cyclones, have resulted in communications being cut for days and sometimes weeks. For example, Lockhart River in Far North Queensland is regularly cut off for over a week at a time, when emergency services are most needed.

The importance of keeping residents connected during the bushfire season has been stressed by many councils after the bushfires. There were many communications failures during the recent 2019-20 bushfires, highlighting the need for improved and more resilient mobile phone infrastructure.

For example, in Kangaroo Valley communications were hampered due to numerous mobile black spots. Neither mobile phone nor emergency radio were accessible. Council has called for more telecommunications infrastructure to be deployed in the Kangaroo Island rebuild.

Similarly in Snowy Valley Council power and telecommunications failures isolated entire townships and villages, impeding vital communication about the fire status to those communities. Some isolated communities had no warning of approaching bushfires and became trapped behind the fire front with no communications.

Local Government New South Wales has suggested that resilience/betterment funding should be able to be used to build improved infrastructure.

Flooding along the eastern seaboard in 2022, led to widespread power and telecommunications outages in impacted areas. Northern Rivers Region councils said telecommunications issues hampered flood rescues and recovery efforts, due to mobile internet coverage being almost nonexistent across large areas, with internet outages and patchy reception the biggest issue for locals. These issues are common in regional and remote parts of Australia where little, or no redundancy means extended loss of communications following emergencies.

Several inquiries post-disasters have recommended the need to improve communications in and following disasters and to build in backup. The development of an effective national Public Safety Mobile Broadband capability, due to be released in October 2022, is a welcome development.

Making telecommunications more resilient to withstand weather events and ensure adequate and reliable battery backup is equally important (noting limitations in areas subject to disasters such as severe cyclones). While battery backup is by its nature limited to a certain timeframe (ideally 12 hours), maintaining services in an existing location is likely to be more useful than deploying temporary telecommunications infrastructure, which often cannot be mobilized in time during a disaster event, due to access to suitable sites (eg. damaged airstrips, damaged roads and widespread flooding).

Building infrastructure resilience through adequate battery backup life in towers, resilient electricity connections and satellite communications is needed, as well as base stations having redundant backhaul during disaster events.

The Regional Telecommunications Independent Review Committee recommended that the Government undertake a feasibility study to consider the capacity for mobile roaming to be deployed in emergency circumstances. The Government's response committed to also commissioning independent audits of mobile coverage during 2022-23 and 2023-24.

Local government supports a trial of mobile roaming to inform how roaming could be utilized in the event of an emergency. The Local Government Association of Queensland has indicated in its submission that it would be pleased to assist in identifying appropriate local government areas in Queensland. Similarly, other Associations would be willing to assist in providing appropriate sites.

Associations would also be willing to discuss alternate solutions where roaming is not an option due to only one provider being present.

Colocation and co-use

Local Government supports co-locating telecommunications equipment on public infrastructure and co-use of equipment by carriers. Co-use should be pursued in the first instance.

ALGA's position on colocation has been to support colocation wherever possible. We have supported open access and colocation on greenfield sites, so that they are designed and built to be capable of supporting at least two further network operators.

Colocation reduces unnecessary duplication of infrastructure and proliferation of telecommunications facilities.

Co-use encourages competition and provides redundancy, but it is not being well utilised in some regional and remote parts of the country (such as the Northern Territory). Further investigation to understand why this is the case would be useful in order to develop solutions. It is possible that the cost of 'leasing' the space from the host provider outweighs the return for other providers.

The Local Government Association of Queensland advises that colocation on towers is actively sought as a solution to telecommunications issues by Queensland councils.

The ACCC discussion paper indicates it is examining other models to co-location and co-use such as the neutral host model. The Government's response to the Regional Telecommunications Independent Review Committee undertook to provide funding for neutral host models which deliver better mobile coverage in regional, rural and remote areas

Local government would support further investigation of the potential for local councils to appoint a neutral host to manage telecoms infrastructure, across some or all of an LGA, serving all carriers in a coordinated manner without unnecessary duplication of infrastructure.

ALGA would be pleased to assist in further investigating a neutral host model.

Conclusion

ALGA supports the activation of mobile roaming in disasters and emergencies. Any increase in connectivity during emergencies will increase the resilience and recovery of communities.

Rural, regional and remote communities are particularly disadvantaged during and after emergencies due to limited telecommunications infrastructure and limited options for their mobile service provider. Mobile roaming is not a solution in areas where there is only one provider and consideration of alternate solutions (eg. NBN satellite wifi mesh) and further investment in these regions is essential to improve their connectivity and preparedness for disasters.

ALGA supports a trial of mobile roaming in emergencies, but also encourages the consideration of alternate solutions where roaming is not an option. ALGA and Associations would be pleased to assist in identifying trial sites and encourage the development of a robust, transparent and evidence-based methodology for determining sites.

ALGA supports further investigation of neutral host colocation model.

Please contact Monica Telesny, Director Policy, by email at monica.telesny@alga.asn.au or phone 02 61229433 if you require further information.

Yours sincerely



ALGA President