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Mobiles, Transmission and Consumer Branch
Australian Competition and Consumer Commission
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Dear Mr O'Leary

Thank you for the opportunity to provide a submission to the ACCC *Regional Mobile Infrastructure Inquiry* on behalf of the people living, working and visiting my large electorate of Indi in Victoria's Northeast.

Australia's rural and regional mobile infrastructure does not deliver universal access to reliable communication. Geography matters. We know that in rural and remote settings, the cost of providing telecommunications infrastructure increases and the commercial returns for private sector telecommunications operators reduce as population densities decline. This limits the scope for universal coverage by commercially focused private sector operators, without government intervention.

In Indi, many communities are missing out on the communication capabilities and access that could encourage economic growth including tourism, decentralized business operations and the maintenance of a safe and resilient population. Residents and visitors alike frequently report to me their exasperation with the varying degrees of mobile telecommunication accessibility and the quality of service. This is particularly so in the alpine areas and in the southern parts of the electorate around Strathbogie. When visitation to our electorate is high during weekends and peak summer tourism periods there are frustrating issues with telecommunication congestion impacting local population and visitor experiences and business operations. The problems experienced in the busy summer holiday period dangerously coincides with bush fire emergency season. There is an expectation across Australia that adequate and modern telecommunications services be available for all but the experiences of people in remote, rural and regional Australia consistently fall short of the experience of urban Australians.

About the Electorate of Indi

The electorate of Indi covers 29,000 square km comprising the nine local government areas (LGA) of Alpine Shire Council, Benalla Rural City Council, Indigo Shire Council, Mansfield Shire Council, Murrindindi Shire Council, Strathbogie Shire Council, Towong Shire, Rural City of Wangaratta Shire Council and City of Wodonga. The electorate of Indi also includes the Alpine resorts of Falls Creek, Mt Hotham, Dinner Plain, Mt Buller and Lake Mountain. Each LGA is characterised by its own unique and diverse topography, land use, populations, and economic activity. Tourism, agriculture, forestry, viticulture, timber production and processing, manufacturing, health and social services and countless small businesses make up the lifeblood of Indi's communities and economy. These varying communities which include regional cities as well as remote mountains and valleys have myriad telecommunication needs and experience an array of telecommunication challenges when undertaking business, agriculture, travel, health care, education, and emergency management endeavours.

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Indi Telecommunications Advisory Group (ITAG)

As a means of representing these LGAs, a consultative committee comprising the electorate's local governments, community members and regional stakeholders was established in 2013 with the purpose of developing community-led responses to telecommunication challenges experienced in our electorate.

The Indi Telecommunications Advisory Group (ITAG) is steered by me as the Independent Federal Member for Indi and since its establishment my electorate has secured 51 new mobile towers.

ITAG would like to see the ACCC recommend guaranteed connectivity solutions which would recognise the potential for growing and innovating in our businesses, meeting the needs and opportunities for online learning, capitalising health service expectations and to recognise our most vulnerable and remote communities' safety demands.

Current situation

While we are proud of our achievements in securing these towers, there is still much to be done. There are many more areas in Indi that suffer poor to non-existent services, despite some of these townships, such as Toolangi in the Murrindindi Shire for example, being located less than 100 km from Melbourne. Some of these areas are susceptible to extreme fire danger. The 2009 Black Saturday bush fires occurred in this region and tragically 173 people lost their lives in the Kinglake area alone. Another 414 people were injured. More than 450,000 hectares burned and 3,500 buildings including more than 2,000 houses were destroyed. In the 2019/20 Black Summer bushfires 29% of the Alpine shire was burnt, while in the Towong shire 600 properties were impacted with 38 primary residences destroyed, thousands of kilometres of fencing destroyed, and more than 6,000 livestock killed or missing. The bushfires ultimately destroyed more than 225,000 hectares of land in the Upper Murray alone. Reliable telecommunications are without exaggeration a matter of life and death in much of my electorate.

In this submission I have attempted to respond to the inquiry questions relating to the impacts to regional towns that a lack of access to mobile coverage causes to residents, businesses, and visitors. I have made suggestions on where improvements could be made. I have also responded to the question of mobile roaming during natural disasters and other emergencies all in relation to the current state of telecommunications experienced across Indi. The following examples are sourced from representatives of each of Indi's nine LGAs and show a consistent story of service failure or partial failure.

Impacts to regional towns that a lack of access to mobile coverage causes to residents, businesses, and visitors.

Alpine

The township of Bright is a much-loved Victorian tourist destination with four season visitation peaking in the winter snow season and over summer. Outdoor adventure tourism is a key attraction. As more visitors arrive, and stay for longer, the current infrastructure cannot cope with the increased user traffic. During weekends and holiday periods the local population of 2,640 people grows to 5,000 on weekends and swells to 25,000 during holidays and peak season. The town is serviced by two mobile towers which cannot cope with the growth in visitation. This is having detrimental effects on local business, residents, tourists and health and emergency services. Reliable telecommunications is a priority for the Alpine Shire Council, the residents and business community. The Chamber of Commerce is so exasperated by the state of local telecommunications that they are exploring other options independently of the more conventional avenues, including locally developed and funded proof of concept public Wi-Fi equipment sitting on a brewery roof, which can provide service to the Bright riverside area, including the market and community events. The reality is though, that they need better investment in the system as a whole.

Benalla

Regardless of community feedback there is reported frustrations from individual community members and businesses that mobile network operators do not register poor connectivity thus inhibiting the likelihood of government investment to boost mobile towers or construct new ones. Requiring regional businesses to bear the costs of poor infrastructure and connection hampers economic prosperity and small business viability. Even with a co-investment offer from private business, there is no guarantee of Government co-funding if the mobile network operators deem the local as not suffering from connectivity issues. There appears to be a reluctance for mobile network operators to acknowledge service deficits.

Indigo

Beechworth's economy is heavily reliant on tourism and its population swells threefold in peak visitation periods. The digital connectivity capacity is so limited in Beechworth that EFTPOS and ATM facilities fail, even during medium visitation periods, prohibiting trade and negatively impacting visitor experiences and consequently Beechworth's long term destination brand credentials. In line with other towns there is a real fear that with bushfire season coinciding with the period of peak visitation, the consequences of Beechworth's inadequate connectivity for thousands more people could be catastrophic.

Beyond Beechworth, the towns of Yackandandah, Chiltern, Rutherglen and the smaller villages like Kiewa, Tangambalanga, Barnawartha, are digitally disadvantaged and disconnected, which at the very least inhibits their social and economic optimisation and at worst, may jeopardise their safety and sustainability.

Mansfield

Every year emergencies within Victoria and interstate highlight the broken links "*on the ground*" that are represented "*on paper*" as successful coverage areas on a variety of service provider indicative maps. The user experience shortfalls were further highlighted during the pandemic where many people regionally in otherwise "*covered*" areas, had little or no coverage whatsoever. And without fail, the school holiday period brings an influx of tourism that causes congestion on the already overloaded system, creating anxiety and frustration for residents, visitors, business owners and emergency services.

Murrindindi

Dissatisfaction is acute in the Murrindindi Shire with some areas facing a lack of both mobile phone connection and nbn services. In regional Australia where we are often faced with an either-or option, not having any option is not only unacceptable it is inconceivable that it is still the case. As noted earlier some of the non-serviced areas of this shire are less than 100 km from the Melbourne CBD.

Strathbogie

As well as the many gaps across the shire there are problems in serviced areas of overload during periods of high demand such as holidays with over 300,000 tourist visitations each year. The Violet Town Community Market is one of our region's premier country markets, attracting visitors from all over Victoria. Unfortunately, it is regularly plagued with connection dropouts and poor reception, making it a frustrating experience for stall holders and visitors alike. These concerns regarding capacity and resilience are exacerbated by the unreliability of the municipality's power supply (end of the grid) which hampers mobile cash withdrawal machines among other services. This region too is highly exposed to bushfires and floods.

Towong

The lack of access through poor mobile and Internet connectivity conveys huge risk to both Towong Shire resident and visitors. The community of Bellbridge have been in regular contact with my office lamenting the severe shortfalls of the mobile network. There are stories of no coverage within homes, causing anxiety for one resident who lives alone and feels the isolation further impacted by this lack of mobile phone access. Lake Hume is also a popular tourist destination. A lack of reliable and robust mobile phone reception is not only undesirable but dangerous. Towong Shire businesses were recently asked about their plans for the short and medium term and would their current Internet and mobile service support their business plans. Most businesses answered a firm *No*. There are multiple complaints to my office about the delays to constructing and switching on mobile base stations after they have been funded.

Wangaratta

The Rural City of Wangaratta encompasses the city itself plus outlying rural areas. The outlying areas frequently report outages or slow or non-responsive services. Local government tell me that the amount of government funding available for new mobile towers needs increasing from \$500,000 to \$1 million to allow for construction in difficult to access rural areas.

Wodonga

Frequent complaints to my office regarding poor NBN services or limited alternative communication options, calls for good mobile coverage as a first option for calls and for data. I have frequent complaints from constituents who say that while the telecommunication company mapping indicates a geographical location is covered by a particular tower, the actual signal strength is so low that they cannot access data. Locals refer to this problem not as black spots but as grey spots. This is problematic particularly for residents who have not connected to NBN for a variety of reasons of which availability is one, cost or lack of reliable housing is another.

Temporary roaming in disasters

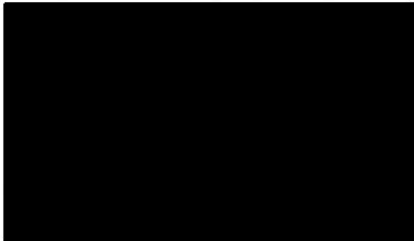
The problems of accessing reliable telecommunication in times of disaster is compounded by a lack of roaming. People in my electorate and visitors alike are frustrated when they cannot access their own provider for everyday communication in parts of the local area, but this is especially problematic and dangerous during natural disasters. During emergencies communication can literally be a matter of life and death. A guaranteed obligation to provide roaming would provide certainty to affected communities that communications will not be lost during fires, floods or storms.

Recommendations:

1. The Federal and State governments have a responsibility to recognise and provide funding solutions to areas that do not meet the commercial viability for a mobile phone tower including the consideration of safety in an emergency and the future resilience of our rural, remote and regional towns. Individuals or local governments must not be forced to find funding to provide what should be universal access to telecommunication.
2. In ensuring that there is universal access to reliable telecommunications, government must look to funding place-based solutions for rural and regional Australians which match infrastructure to their needs including isolated residents in challenging terrain and businesses in high visitation tourist destinations. Funding assistance should include repeaters, public wifi, small cells, new technology as it emerges in addition to mobile base stations.
3. Signal strength as an indicator of service adequacy must be defined clearly on service maps to give an accurate picture of actual real time service delivery.
4. The need for reliable communication in times of emergency is paramount – there should be an obligation to enable roaming in emergency situations.

I wish the ACCC success with its consultation.

Yours faithfully



Helen Haines MP