

Isolated Children's Parents' Association of Australia Inc.

"Access to Education"



Submission

to the

Australian Competition and Consumer Commission
Regional Mobile Infrastructure Inquiry

from the

**Federal Council
of the
Isolated Children's Parents' Association of Australia Inc.
ICPA (Aust)**

August 2022

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The Isolated Children's Parents' Association of Australia, ICPA (Aust), welcomes the opportunity to contribute to the *Australian Competition and Consumer Commission Regional Mobile Infrastructure Inquiry* providing feedback related specifically to communications needs of rural and remote education and geographically isolated students.

ICPA (Aust) is a voluntary, apolitical, national parent organisation, which advocates on behalf of our members for equity of access to an appropriate education for all geographically isolated children and students, from early childhood through to tertiary. The majority of member families of the Association reside in geographically isolated areas of Australia, and all share a common goal of achieving equitable access to education for their children and the provision of services required to achieve this. Students whose family home is in rural and remote Australia, often live great distances from their nearest education institution and from services required to support the education of these students.

ICPA (Aust) emphasises that accessibility and availability of high quality, reliable and affordable communications services is critical in rural and remote Australia. Therefore, any proposal or potential to ensure that communications can be maintained or improved at any given time and in particular during natural disasters and other emergencies is welcomed.

ICPA (Aust) appreciates the ACCC undertaking this inquiry which actions Recommendation 9 from the Regional Telecommunications Review 2021. The suggestion of mobile telecommunications and other radiocommunications services in regional areas, and the feasibility of providing mobile roaming during natural disasters or other emergencies is one that has been recurrent in recent times. ICPA (Aust) notes that mobile roaming through limited and well-defined circumstances, such as during a natural disaster or an emergency, could provide an important safety measure to people in these areas without impact on the overall competitive dynamics in the telecommunications market. Mobile roaming during emergencies/natural disasters could assist people to contact emergency or rescue services, or each other, if they are in an area where their own mobile provider does not have coverage. While mobile phones in Australia can access emergency numbers (e.g. 000) via other providers' networks, having the ability for other numbers to be accessed via a mobile phone operating on another carrier's network in times of natural disaster or emergency allows for the relay of important messages such as notifying of welfare, alerts to area conditions and other important information at critical times.

For our members who reside in a remote location where mobile roaming may be possible, this would be a welcome development to ensure that in times of natural disaster and emergency these families would be able to remain in contact with others and to particularly access support/assistance that may be available to those closer to a more urban location. Often these people would have to 'help themselves' in these situations as they would not be able to contact anyone to assist them if their communications are out. To best assist customers in regional areas during times of natural disaster or emergencies, roaming options should include text, voice and data services. The availability of roaming may also assist rural and remote students continue to access their schooling in times of lengthy communications outages resulting from natural disasters by providing them with an alternative means for connection.

Another benefit of mobile roaming in times of natural disaster in regional areas with multiple service providers would be if the tower of one service provider was damaged or destroyed and towers of other providers in the area or further out may be accessible to keep communications open. A question raised in our discussions with members regarding the possibility of roaming during emergencies is congestion on the towers if roaming were allowed. It is imperative that the availability of mobile roaming during these times should not worsen any already existing capacity on towers. Member feedback on this topic has raised the following concern:

“If roaming was available, would we also see a reduced capacity in the 'data' available from the tower as more people are using it? It is bad enough in our area during the tourist season when we have a lot of traffic on the road, the towers don't seem to cope and residents note that service capabilities are affected.” (NSW)

Schools

In many situations small rural schools are standalone locations, which function as community meeting points particularly during emergencies and natural disasters, such as bushfires. There has been a concerted effort to improve mobile coverage in these locations and steps to ensure this service could be continued during natural disasters would be welcomed. Mobile coverage along regional and rural routes used by school buses would also benefit from extended coverage and roaming in times of emergency or natural disaster so that information and messages could be transmitted to students or bus drivers about road conditions and developments during disasters. ICPA (Aust) members have raised the following:

“Where we live now has suffered from extensive bushfire damage in the past and I know that there was a huge issue with communications at the time, lives and many assets lost. There are at least three different school buses that go through our area and small towns with rural schools were evacuated at different times. Emergency service volunteers from across Australia with different providers also caused issues as we only have Telstra towers in the area.” (SA)

“On the topic of education.... As a teacher at a school, it is vital we have communication channels in times of disasters. School buses drive on remote roads and also need coverage.” (WA)

Limited Mobile Coverage

Despite ICPA (Aust) seeing merit in mobile roaming during times of emergency and natural disasters where this is possible, we reiterate that many of the families represented by ICPA (Aust) currently have limited to no mobile coverage at any time. While we welcome the move to improve communications during challenging times, focus must be placed on expanding general mobile coverage to those locations where it is not available at all and this should not be forgotten in lieu of a concentration on providing roaming. While 99% of Australia's population is said to have mobile coverage, in reality, only 27% of Australia's landmass is within the mobile footprint, leaving vast areas without any coverage.¹

In many cases, mobile roaming could not be considered by many geographically isolated families because of where they live. Often people living in rural and remote Australia can struggle to maintain just a working landline and can be many kilometres away from the closest mobile reception. This point is reiterated by the following comments from members:

“We actually need better coverage of mobile signal full stop as any day can be a disaster and we need communication right there and then, as well as in times of disaster.” (NSW)

“Our friends from the city come to visit us and get very little coverage in places we have some on our highways (we have no mobile coverage in our area and sketchy Telstra coverage (on two highways) 80 and 120km from home) so I feel these visitors and travellers would benefit more from any mobile roaming than the actual residents. Even during a natural disaster, the benefit will reach travellers and visitors more than actual residents.” (QLD)

In areas where there is mobile coverage in rural and remote locations, there is often only one provider even in regular times, with people local to the area using this provider. In these situations, mobile roaming coming into effect during emergencies would most likely benefit non-residents in the area

more than they would assist local community as these people would already be customers of the provider in the area. Of course, it is of benefit for emergency service workers and others assisting to be able to use mobile service, as long as it does not compromise the service of the local community at such a critical time due to congestion on the service or other interference.

Power Backup

For several years, ICPA (Aust) members have debated, voted on and passed motions at our annual federal conference regarding improvement of back-up power on communications towers. If power is not available to towers during times of emergency/natural disaster, then mobile roaming will not be of any use. It is essential that provision of backup power is also considered along with the possibility of mobile roaming in these instances. Members have commented:

“Our area and when there are flooding and fires, roaming doesn’t help, electricity is more our need as we at our houses are all on self-purchased boosters that require power. More often than not the general power goes out too and whilst we have a generator the Telstra tower doesn’t so roaming or our boosters are redundant.” (QLD)

“I think battery back up the main issue in our area during adverse weather, if we lose power we can have many residents, without nbn, with no communication for weeks, as most of our landlines also run off the mobile towers.” (NSW)

“My comment would be that when a cyclone went through our region last year, we had no communication and no way of letting anyone know we were ok or if we weren't, and no way of calling someone for help. When help did arrive, many were on different services from all providers and had travelled from all over Australia as part of the SES (state emergency service) we had all sorts of assistance workers lost as they tried to navigate their way around our district with no communications. (They had radios, but these are distance and power limited). This wasn't an effective use of such an important service. In the case of natural disasters- fire/cyclone in our area then the infrastructure could be damaged.....” (WA)

Conclusion

For those living in regional, rural and remote areas where mobile service is available, having mobile roaming available during times of natural disaster and emergency would be beneficial, even if this benefit mainly assisted those from outside the area such as stranded travellers, emergency services workers and other support groups, as long as this can be done without detriment to any existing service. In order to increase effectiveness, backup power and the expansion of mobile services should be considered in conjunction with providing mobile roaming in defined circumstances.

Once again ICPA (Aust) appreciates the opportunity to contribute to this Inquiry.

ⁱ <https://www.clientsat.com.au/mobile-phone-coverage-in-australia/#:~:text=Mobile%20phone%20services%20are%20available,cent%20of%20the%20Australian%20landmass.>