

Monday 3 April 2023

Email: rmii@accc.gov.au

Dear Australian Competition and Consumer Commission (ACCC)

**Re: Regional Mobile Telecommunications Infrastructure Inquiry
Consumer Survey and Feedback**

Firstly, we would like to thank the team at ACCC for facilitating an online session with five Mayor's, an Elected Member and CEO's of Murraylands and Riverland region on Wednesday 22 March 2023.

We appreciate the ACCC team taking time to hear direct feedback, as we believe it's important to hear the voices from those who live and work in region and can provide experience based feedback.

Mobile service is an important regional issue impacting thousands of people and businesses and we support strong advocacy to see immediate solutions and improvement towards this essential service.

Below outlines the items discussed during the meeting and points that the signing constituent councils wish to submit as "consumer feedback" to the inquiry:

- **What is deemed 'Satisfactory'**
 - Without an agreed service technical statement between 'provider' and 'regional customers' the gap for misrepresentation of the quality of a service will remain.
 - Many areas receive 1 bar / 1 day. Is this considered satisfactory?
 - When asked what is defined as good / acceptable service, we are informed there is no technical definition(s) we can refer too. This results in mis-communication. An example is when a provider says the coverage is acceptable, but a customer has 0-1 bar. This creates mis-trust in the telecommunications industry rather than transparency.
 - Quality of service must be defined and the definition must be developed in consultation with regional customers. In the Murraylands and Riverland we have over 77,000 people and 6500 business who all deserve an agreed standard of service to live, grow and prosper.

- **Coverage / Maps**
 - It is unanimously supported by all that coverage maps are not accurate and do not reflect 'real-life' on ground experience.
 - If a coverage map has only been developed by desk-top assessment and assumptions, these should be deemed void.
 - The gap between coverage maps and 'real-life' has reached a degree of inconsistency that continues to weaken the relationship between provider and regional customer. The mis-trust has deepened as the years have progressed and now extends to the sector, including Government's effectiveness to facilitate better standards, outputs and outcomes.

- Telstra Officers have visited regional towns in the past. However its response is that there is coverage, which we observe can be achieved using several antennas mounted on a vehicle.
 - How do we know if the Government is getting the right information if the coverage maps are not accurate/reliable?
- **Removal of 3G**
 - Regions face 'Digital Poverty' if we lose 3G.
 - Technical specialists are confirming concern for the removal of 3G and that it will impact agricultural and horticulture sectors, including the use of equipment and sensors if 3G closes down. This concern is not being acknowledged by the service providers and there is a gap in qualifying the issue.
 - Technical specialists have advised that the removal of 3G will impact economy and liveability. Including security systems shutting down because they are not compatible with 3G.
 - It is strongly advocated for that 3G is not turned off before there is a viable / proven, guaranteed and confirmed service. More of the regions reliance on 3G is provided below.
 - 3G did not hold out on Highways during the recent flood emergency and this is a serious concern that the Government and consumer services should be factoring into policy, service provider requirements and decisions.
 - Berri has 5G but reverts back to 3G / 1 bar in less than 5km.
 - 4G LX is operating but is not overly useful as its lost within < 10km of leaving town.
- **Economy and the regions \$4.3 Billion GDP**
 - The Riverland is the largest winegrape region (by tonnage) in Australia. The sector invests in its technology / farming particles and the impact to the regions economy could be significantly jeopardised if the removal of 3G occurs without guarantees and provisions in place to ensure there is zero negative impact.
 - Can we change the formula for talking about the feasibility of towers and signals? Let's talk about "Economic Production Per Population" instead of "Calls Per Person". The Murraylands and Riverland (pre 2022/2023 flood) reached over \$4.3B in GDP. Part of the regions growth strategy is to continue to improve its GDP and this is integrated with many dependency's, mobile service included. A new formula of "Economic Production Per Population" offers a rational, evidence based formula to work from.
 - Our economic viability co-exists with mobile reception.
- **Agricultural sector**
 - The removal of 3G may impact the agricultural sector as farmers rely on text messages for sensors. Part of agricultural systems are reliant on 3G and its removal can be detrimental to workflows in businesses.
 - Parts of the agricultural sector and equipment is only 3G compatible and if removed has the potential to be detrimental to production.
 - Farmers utilise radio when signals are down, which is evidence of 'digital poverty' occurring in regional Australia.

- **Highways**
 - The Sturt Highway unfortunately has the second highest fatality rate. With this level of traffic on the highway, its only reasonable to expect better coverage and service, however providers fail to meet an acceptable standard.
 - During the emergency, 3G didn't hold out on highways and this is a concern.
 - In situations where solutions of dual sim cards are proposed, this is deemed an unreasonable / impractical solution.
 - We support a "drop out free" zone along every state and national highway, for safety and productivity.

- **IT Dependency**
 - As industry moves away from labour/workforce and closer to IT developments, parts of modernising business' / practices rely on mobile reception. The lack of consistent coverage and reliability in regional areas hinders business to grow and develop at an equitable rate to city centres when mobile reception is unavailable.

- **Poor coverage, reliability and service is a long standing issue**
 - Mobile reception, quality and consistency of service for regional areas has been a long standing issue over many years.
 - Regional areas have limited options and often end up paying premium for a limited service.

- **Research in Technology**
 - Even though we have boosters in cars, it still goes from 4G to 3G to being lost.
 - Boosters can be expensive and the short range has limitations on use.
 - Is the industry looking into more advanced technologies (ie low level satellite) that's not reliant on towers or is there a move away from depending on towers to provide service?
 - Starlink is a (fixed satellite) option but not designed to work in car/house.

- **Service Model for Regional Australia**
 - Can mobile telecommunications be deemed an 'essential service' and therefore government managed and operated for region Australia? Using an "[Economic Production Per Population](#)" formula, the return on investment will be measured / seen from a rise in GDP.

- **Lyrup and Paringa examples**
 - Telstra reports the coverage in Lyrup and Paringa is good, but this is contrary to the experience and community reports on ground.
 - When reading a complaints platform, it shows there are 2 in the area, but from speaking with the community, it is more realistic to report 25-30 people with issues and keen to submit complaints.
 - How do we know if the Government is getting the right information if the coverage maps are not accurate/reliable?

- **Change to asset owners and mobile infrastructure**

- The changes in infrastructure ownership for mobile telecommunications (ie allowing providers to sell towers to companies (both inside and outside of Australia)) has impacted the ability to improve mobile service in regional Australia. The formula for a 'passive and active' asset to come together relies heavily on strong relationships, not policy or standards of service. This vulnerability in the system can create instances when a 'passive' asset owner will have different criteria and feasibility measures than the 'active' asset owner, and thus creates less opportunity for more infrastructure roll out and therefore less opportunity for better service.
- The model of separate asset owners is considered 'high risk'. Passive asset owners can and will seek higher profit margins than government programs (that could be provided at 'cost neutral'). This means the roll out of infrastructure is driven or provided when there is profit potential, not regional equity. And here lies a fundamental problem with the arrangement. Infrastructure roll outs will only continue to be delivered if/when the profit can be high enough to meet targets, not when a service can be provided cost neutral. Infrastructure that falls within this range is often located in regional areas and therefore not delivered.

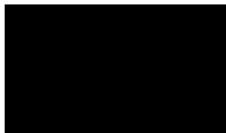
- **Upgrades**

- Note it can be challenging for regional areas to hear about 5G and the technology advances for metro areas, when some areas don't even receive 3G.

Thank you again for the opportunity to present these issues and meet with us. It allowed us to share real life experiences about the gap in mobile service for regional areas.

We look forward to seeing the final report from the ACCC, and hope this submission can inform positive future policy that guarantee a quality of product and service for people and businesses located in regional Australia.

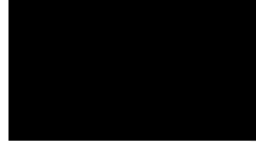
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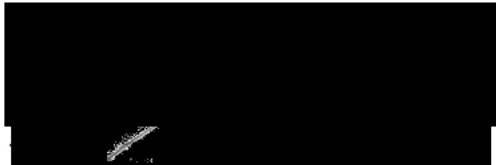
Carron McLeod
Chief Executive Officer of MRLGA



Mayor Caroline Phillips
President for MRLGA



Mayor Paul Simmons
Deputy President for MRLGA



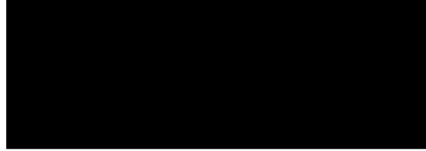
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