



PREMIER OF TASMANIA

16 SEP 2022

Mr Grahame O'Leary
Secretary
Regional Mobile Infrastructure Inquiry
Email: RMII@accc.gov.au

Dear Grahame,

Thank you for allowing my Department additional time to prepare a submission on behalf of the Tasmanian Government to the Australian Competition and Consumer Commission (ACCC) 's *Regional mobile infrastructure inquiry 2022-23*.

The Tasmanian Government is working to improve disaster response readiness across the State, including remote communications for emergency services and the community. To this end, the Tasmanian Government has undertaken considerable work to extend service reliability in regional areas and can provide the following information relevant to the Inquiry's Terms of Reference.

I note from the Terms of Reference the focus on industry perspective. That is, *'the costs of providing towers [etc] ... and how these translate into the [co-location] fee structures ... [and] factors that are important for industry [to guide such investment].'* Innovation and heavier reliance on mobile technology require additional tower infrastructure. The development of these towers will require ongoing investment as technology, such as 5G, is rolled out. Given these ongoing costs, issues relating to planning and land acquisition, and relative market size in regional areas, the business case for private investment in infrastructure is challenging.

There would be great value in considering further policy objectives that would complement the goals of this Inquiry. These objectives include improving national network coverage and competition, equity and digital inclusion outcomes, and supporting cross-sector digital transformation opportunities (for example, AgTech, environmental and vehicle monitoring, high-quality video streaming, emergency management, et cetera). The Tasmanian Government encourages the ACCC to consider complementing the Inquiry with consideration of these issues.

Please find attached a copy of our comments. Where these align with a question from the consultation document, that numbering has been provided. I trust this information will assist the Committee and look forward to reading the final recommendations.

Yours sincerely


Jeremy Rockliff MP
Premier

Response to Specific Questions

22. What are the benefits to the general public from the provision of temporary mobile roaming during emergencies? Are there any potential detriments?

The Tasmanian Government recognises the importance of public access to the broadest range of telecommunications services during emergencies. Tasmanians rely on access to essential online services during emergencies, including TasALERT, the Tasmanian Government's official emergency warning and information website.

The Tasmanian Government is investing in the resilience of TasALERT; has expanded mobile coverage in key areas; and has worked with the Australian Government to support its Mobile Black Spot Program to enhance services in regional Tasmania.

Further initiatives to strengthen the resilience of telecommunications during emergencies are welcome.

23. What are the benefits to emergency service personnel and organisations from the provision of temporary mobile roaming during emergencies

The Tasmanian Government is delivering the Tasmanian Government Radio Network (TasGRN) to provide a more reliable and resilient radio network for our emergency services. We are also working with other jurisdictions to deliver recommendations of the *Royal Commission into National Natural Disaster Arrangements* related to the Public Safety Mobile Broadband (PSMB) capability.

Further initiatives to improve the availability of robust and reliable services to emergency management personnel are welcome.

27. What are the protocols for declaring a natural disaster or emergency? How is this communicated and co-ordinated with mobile network operators?

Tasmania's emergency management framework is provided by the *Emergency Management Act 2006* (the Act) and the *Tasmanian Emergency Management Arrangements* (TEMA). The Act allows the State Controller (the Commissioner of Police) to declare a state of alert or state of emergency in relation to a disaster or emergency. Such a declaration confers certain powers on the State Controller and must be made as a written declaration. There would typically be significant public communications activity and media coverage of a declaration under the Act.

In addition, all natural disasters and emergency events are managed within the TEMA. Most events do not result in a formal declaration of a state of alert or emergency. Regional Emergency Management Committees (REMCs) co-ordinate emergency management activities in Tasmania's three regions. Telecommunications providers are members of the REMCs, establishing relationships between the providers, municipal emergency management coordinators, and regional emergency management controllers. These relationships are used for information sharing during natural disasters and emergency events.