



ACCC submission

Submission to the ACMA on its proposal to make the Telecommunications (Mobile Network Coverage Maps) Standard 2026

27 February 2026

Executive summary

The Australian Competition and Consumer Commission (**ACCC**) welcomes the opportunity to provide this submission to the Australian Communications and Media Authority's (**ACMA**) consultation on the draft Telecommunications (Mobile Network Coverage Maps) Standard 2026 (the **proposed standard**).

Coverage is a significant factor that consumers consider in choosing mobile services. It is important that the mobile network operators' (MNOs) coverage maps are comparable and contain meaningful and reasonably accurate information to inform consumer decision-making. If consumers are not sufficiently informed about what the coverage maps represent and their limitations, there is also a risk that consumers purchase mobile services that do not meet their needs.

The current approach to coverage maps relies on the MNOs' specific modelling approaches which are not consistent or transparent. This leads to coverage maps that are not comparable and may not reasonably reflect on the ground experience. This undermines consumers' decision making and distorts the competitive process.

The proposed standard addresses many of these issues and is a significant step forward. Standardised modelling assumptions for 4G and 5G mobile coverage, consistent coverage levels and mandatory caveats around the coverage maps will materially improve transparency and allow consumers to make like-for-like comparisons.

The ACCC has set out its views on the proposed standard which are summarised below. We have suggested some refinements to the ACMA's proposal ensure the standard delivers coverage maps that are sufficiently comparable, provide useful information to consumers and reflect consumers' expectations around mobile services.

We acknowledge the ACMA's compressed implementation timeframe and support an iterative process in developing the standard. We recommend that the ACMA develop a forward-looking work program to further explore issues that cannot be resolved before 31 March 2026.

Coverage levels and descriptions

- We support setting multiple coverage levels to provide consumers with a clearer picture of coverage quality in different geographic areas.
- We suggest replacing the "useable" coverage descriptor with "variable" and expanding descriptions to better explain what consumers can and cannot do at each level.

Mandatory caveats on assumptions and limitations

- We support requiring the MNOs to provide consistent mandatory caveats on assumptions and limitations associated with the coverage maps.
- We suggest that the caveats make clear that the coverage maps represent coverage expected when using a handheld mobile device, without coverage extension device.

Modelling methodology and assumptions

- We consider the modelling assumptions should be informed by how consumers expect to use their mobile services to the extent possible. We encourage the ACMA

to consider additional measures to improve consumers' understanding of the standardised coverage maps if their expectation of what coverage means potentially diverges from what the standardised coverage maps will be able to show.

- We do not support providing the MNOs with upfront flexibility to adopt different signal-strength thresholds at this stage as there is insufficient evidence this is justified and would undermine comparability of the coverage maps.
- We support the ACMA reviewing the specified signal-strength thresholds over time as networks evolve, informed by independent testing.
- We suggest that the ACMA consider standardising additional elements of the modelling process, such as the propagation model used, approach to fine tuning the model, terrain/clutter data as these can materially impact modelling outcome and comparability.

Publication requirements / updates

- We support requiring the MNOs to review and update coverage maps at least every three months at the initial stage. If the ACMA considers the benefits outweigh the cost, we suggest moving to more frequent updates (e.g., monthly) in the longer term.
- We suggest that the published coverage maps should be made downloadable/extractable in geospatial formats from MNO websites for broader analytical use (not just for Emergency Service Organisations).
- We support the requiring the MNOs to provide coverage maps to their wholesale customers to enable the latter to publish their coverage maps on their websites.

Multiple maps / coverage representations

- We suggest the ACMA clarifies the circumstances in which an MNO can make multiple maps. We suggest that the standard makes clear that they can only do so if they offer different coverage based on plans/offerings. However, MNOs should only be allowed to publish 4G and 5G outdoor coverage maps that are in accordance with the modelling assumptions in the standard.
- We suggest that the standard requires that coverage representations made by MNOs to be based on the industry-standard compliant map(s).

Compliance and verification/measurements

- The ACCC suggest that the standard requires regular independent audit of the MNOs' coverage maps to verify compliance.
- We support the use of in-field measurements through independent testing to improve and refine predictive modelling over time.

The ACCC supports the making of an industry standard

The status quo harms consumer decision making

Mobile coverage is an important factor that consumers consider when selecting which mobile service to purchase. It is important that the MNOs publish coverage maps, that facilitate informed consumer decision-making.

However, there is currently a lack of transparency over how the MNOs produce their coverage maps and the extent to which the coverage maps represent on the ground experience is unclear. In addition, the MNOs may employ different methodologies, standards, or presentation formats for coverage maps, which means consumers cannot effectively compare offerings on a like-for-like basis. The lack of transparency and comparability leads to the risk of consumers making purchasing decisions based on unreliable information and purchasing services that are unsuitable for their needs.

In addition, the lack of transparency over the methodology and assumptions used by the MNOs to produce their coverage maps also means that the basis of any broader coverage representations made are not clear and cannot be readily scrutinised. This can give rise to the risk of misleading coverage representations and consumers making purchasing decisions without fully understanding the basis and caveats associated with the coverage representations.

Lack of transparency and comparability distorts competition

Given that mobile coverage is an important factor influencing consumer choice, the lack of transparency and comparability relating to coverage maps can significantly undermine the competitive process in the mobile services market.

The MNOs have made billions of dollars in investments over time to improve their coverage in terms of both reach and quality. In a well-functioning market with well-informed consumers, it is only through these investments that MNOs compete for coverage superiority. Consumers can then reward network investment by selecting the MNO/s with superior coverage (reach and/or quality) and create pressure for all MNOs to invest.

In addition, consumers also consider a range of other factors in selecting their providers, such as price. While not all consumers would pay a premium on the basis of coverage, many consumers likely consider which network has the better or larger coverage, and also how much better or larger compared to competitors, in choosing their provider. This will impact how much more these consumers are willing to pay for the superior coverage.

However, when the MNOs can use different coverage prediction methodologies, the differences in coverage maps may not reflect genuine differences in coverage. Some MNOs may be more conservative or optimistic in predicting the coverage they can reasonably provide compared to their competitors.

The reward mechanism for network investment becomes distorted in this scenario. An MNO that invests significantly in additional infrastructure may not be able to reap the rewards of

that investment if competitors can achieve the same coverage claims through different measurement assumptions.

The ability of MNOs to adjust their coverage prediction methodologies without proper oversight in the absence of an enforceable industry standard may also encourage a 'race to the bottom' where competitors adopt similar 'optimist' approach to coverage maps to avoid losing customers to rivals.

In these circumstances, dynamic competition between MNOs is reduced. MNOs may be disincentivised to expand their networks because the commercial return on genuine investment becomes diluted. Ultimately, it may deprive consumers of the improvements that would otherwise flow from infrastructure-based rivalry.

Industry-led approach to standardising coverage map is unlikely

Differences in the MNOs' inputs and assumptions in their coverage prediction models are commercially sensitive and aligned with each MNOs' strategic interests. As a result, the likelihood of the MNOs voluntarily converging to one methodology in the absence of regulation is likely low.

Indeed, prior industry-led efforts to harmonise methodologies have been ineffective. In 2018, the MNOs voluntarily agreed to common definitions of three categories of coverage.¹ However, they did not standardise the underlying modelling inputs or technical parameters used to generate those coverage maps. As a result, coverage maps purportedly reflecting the same coverage level are not directly comparable.

More recently, the Australian Mobile Telecommunications Association (AMTA) convened a working group to explore standardised approach to coverage maps across industry. However, as indicated by the ACMA in its consultation paper, the AMTA working group was unable to reach a consistent industry-wide approach to key modelling parameters or thresholds.

Limits of ACCC's powers in promoting transparency and comparability

The ACCC has sought to use its Record Keeping Rules power to provide additional transparency regarding the MNOs' coverage maps and how they have changed over time. Under the Audit of Telecommunications Infrastructure Assets Record Keeping Rules, the MNOs provide a range of information, including their coverage maps, to the ACCC on an annual basis. The ACCC has published these coverage maps annually since 2021. However, the Record Keeping Rules power does not give the ACCC any ability to dictate how coverage maps are presented to consumers.

The ACCC has in the past analysed changes in the MNOs' mobile coverage maps and presented them through its Mobile Infrastructure Report. However, in the absence of a standardised coverage prediction methodology, expansions or contractions in coverage maps reported by the MNOs to the ACCC may simply reflect changes in MNOs' modelling assumptions. It is for this reason that the ACCC ceased publishing analysis on changes to the MNOs' mobile coverage maps under the Mobile Infrastructure Report in 2024.

¹ The MNOs agreed on three types of coverage definitions: Indoor, Outdoor and External Antenna. See AMTA website at: [Understanding coverage maps - AMTA | The Voice of the Australian Mobile Telecommunications Industry](#).

The ACCC also has powers to take enforcement actions regarding misleading or deceptive coverage representations, including coverage maps, under the Australian Consumer Law. However, as mobile coverage is inherently variable, such enforcement actions can be subject to technical complexity and evidentiary challenges, and would not resolve the fundamental issue of the MNOs having the discretion to adopt differing methodologies. This underscores the need for a mandatory, nationally consistent standard that supports both transparency and comparability of coverage maps.

For these reasons, we support the making of an industry standard as it is the most appropriate regulatory tool to achieve coverage maps that promote effective consumer decision-making and support the competitive process. We provide our comments on the proposed standard in the following sections.

We support the draft industry standard, but suggest refinements

The proposed standard includes a range of obligations and requirements which we consider will significantly improve the way in which the coverage maps are prepared and presented. We broadly support the ACMA's proposals to:

- Set a consistent set of coverage levels and descriptions
- Require mandatory caveats on assumptions and limitations
- Define the signal-strength thresholds
- Standardise modelling assumptions
- Set publication requirements as well as obligations to provide coverage maps in certain circumstances.

We suggest that further refinements are made to the proposed standard to ensure that it better aligns with the objectives of the Ministerial Direction, in particular to achieve coverage maps that are comparable and provide clear, up-to-date and useful information to consumers.

The ACCC recognises that the ACMA is operating under compressed timeframes in this important matter. We also recognise that some adjustments that the ACCC proposes to be made to the standard are more complex and may require more time and consultation prior to implementation. To this end, we support the ACMA taking an iterative approach to implementation and refining the industry standard over time as further evidence, consumer insights, and technical validation become available.

Coverage levels and descriptions

The ACCC supports the proposal that coverage maps must identify multiple levels of coverage. We consider this provides a richer picture of the quality of the coverage compared to the current binary presentation of 'coverage/no coverage' in public facing coverage maps.

"Useable" coverage descriptor does not seem appropriate

The ACCC considers that the descriptors "good" and "moderate" reasonably describe the likely expected quality of coverage at these coverage levels and align with the descriptions.

The ACCC notes that the descriptor "useable" may create an overall impression to consumers that the level of service they can reasonably expect is at least a functional mobile service in all the circumstances. However, the description of "useable" suggests that the experience in these areas is likely to be variable, suggesting there may be periods where calls, SMS, or data services intermittently fail.

In the ACCC's view, the descriptor "variable" is perhaps a more appropriate term that accurately reflects the described nature of the expected experience. This terminology also accords with international regulatory practice. Ofcom in the United Kingdom uses this term

to describe similar coverage experience levels and to signal the fluctuating nature of service at this coverage level.

Coverage level descriptions should include information on how consumers can expect to use their mobile services

The proposed coverage descriptions seek to distinguish the different levels of coverage by reference to the degree of reliability and variability of performance expected. We consider this is a useful indication of the varying quality of service in different geographic areas.

However, the ACCC considers that some of the words used in the descriptions, such as moderate and average, could be interpreted subjectively. The clarity and utility of the coverage descriptions could be improved by including more information on how each service level translates into how consumers can use their mobile services. For instance, the ACMA can explore including information on indicative end-user activities can be expected at each coverage level in a way that is reasonably representative. This information may be particularly useful if the expected performance of voice call, SMS and data can vary within a coverage level. This would provide more meaningful information to consumers regarding what they can expect to do and, more importantly, cannot do. We consider additional information reduces the risk that coverage descriptions may mislead consumers, contrary to the objectives of the Australian Consumer Law.

Mandatory caveats on assumptions and limitations

The ACCC supports the proposed obligation for the MNOs to provide clear caveats, relating to the underlining assumptions and limitations of the coverage maps. We support the caveats including information on the type of coverage (i.e. indoor, outdoor, etc) that is shown based on the modelling assumptions that are adopted in the predictive model, and clear explanation of what they mean. This is particularly important if the type of coverage predicted using the modelling assumptions specified in the Standard does not fully reflect what an ordinary consumer would perceive as mobile coverage. This is discussed further below in relation to modelling methodology and assumptions.

We suggest making clear that the coverage maps show expected coverage when using a *handheld mobile device* without the use of coverage extension device.

We also support including caveats relating to device compatibility issues and potential variability in performance depending on the devices used.

The ACCC considers that there should not be flexibility enabling the MNOs to vary the language of these caveats. Allowing each MNO to make their own caveats risks creating differences in emphasis, clarity, or prominence that could confuse consumers or downplay important limitations. Mandating the use of the same standard caveats ensures that all consumers receive consistent and accurate information about how to interpret coverage maps.

Modelling methodology and assumptions

The proposed standard addresses many of the methodological inconsistencies under the status quo by specifying a common set of signal-strength thresholds that determine the boundaries of the proposed coverage levels and standardising eight modelling parameters that the MNOs must use. As mobile coverage is inherently variable and actual experience

can be affected by many environmental factors, we consider a conservative approach to selecting the modelling assumptions and parameters should be taken.

We note that other modelling assumptions are proposed to be left to the MNOs' discretion. We acknowledge the ACMA's view that there needs to be a balance between ensuring comparability and accuracy of the coverage maps. We provide our comments below in light of this potential tension.

What constitutes as coverage should to the extent possible reflect what an ordinary consumer considers to be coverage

The proposed standard specifies that predicted coverage is to be made to show where consumers will likely be able to connect to a mobile network when outdoors and at ground level. In particular, the proposed standard does not require the MNOs to predict indoor or in-vehicle coverage.

We consider that to the extent possible, the predictive modelling prescribed in the Standard should reflect what an ordinary consumer would consider to be coverage. We consider that indoor mobile coverage is likely to be important to many consumers. However, we acknowledge that given the prevalence of voice over WiFi and SMS over WiFi capabilities, cellular coverage is not the only option for consumers to use their mobile services while indoor.

On the other hand, it is conceivable that an ordinary consumer would expect the coverage maps to reflect the level of service while travelling in vehicles. The ACCC considers that consumers in regional and remote areas are, in particular, more likely to expect mobile coverage to include in-vehicle use due to the large distances between towns, more time spent by consumers in these areas travelling on roads and highways, and generally higher degrees of car dependency on a day-to-day basis.

In addition, Emergency Service Organisations and their personnel, which the Ministerial Direction recognises as important users of the coverage maps to be produced under the standard, would frequently operate from within vehicles when responding to incidents, undertaking patrols, or coordinating activity over large geographic areas.

We acknowledge the ACMA's initial view that it is challenging to reliably predict in-vehicle coverage but encourage the ACMA to explore this further in consultation with industry.

Moreover, we consider it is important to recognise the potential divergence between an ordinary consumer's perception of 'mobile coverage' and what the standardised coverage maps will be able to show due to technical constraints. The proposed mandatory caveats on limitations and assumptions will go some way to address this. However, we encourage the ACMA to consider whether additional measures, including consumer-facing guidance, would be beneficial in improving consumers' understanding of the standardised coverage maps.

MNOs should not have the flexibility to adopt different signal-strength thresholds at this stage

The proposed standard seeks to specify threshold values for the Reference Signal Received Power (RSRP) and Secondary Synchronisation Reference Signal Received Power (SS-RSRP) and the signal-strength range for each coverage levels. The threshold values determine the boundaries of the coverage maps for 4G and 5G, which is proposed to be -115 dBm (decibel-milliwatts). The ACMA noted that the proposed threshold values are informed by

international standards and the findings of the Federal Government's National Mobile Coverage Audit. The ACMA is seeking views on whether the MNOs should have some flexibility to adopt a slightly different threshold (e.g. ± 3 dB), provided that specific criteria are met. The purpose of such flexibility is to allow the MNOs to reflect differences in network configurations or service offerings.

The ACCC does not support providing flexibility for the MNOs to adopt a different signal-strength threshold at this stage. The ACCC has concerns over the transparency and scrutiny that can be applied to these variations to the dBm value which are at the discretion of each MNO and potentially to the detriment of competitors. It is unclear whether any general criteria can be formulated upfront to cater for all the scenarios, which the MNOs may argue, should enable them to depart from the specified threshold. It is also unclear how the ACMA intends to scrutinise whether any specified criteria have been met.

We also understand the proposed threshold is informed by the findings of National Mobile Coverage Audit. Unless the Audit found material differences in how the service levels deteriorate below the proposed signal-strength threshold across the networks, we do not consider there is currently any basis for allowing the MNOs to potentially adopt different thresholds.

The ACCC acknowledges that MNOs may invest in different technologies or adopt different network configurations. We consider it would be appropriate for the ACMA to review the technical parameters to ensure that they remain appropriate as the mobile networks evolve over time, having regard to more up to date data from independent testing and other evidence that may be provided by the MNOs.

The ACCC also notes the ACMA's proposal that any additional coverage level generated by using a different signal-strength threshold needs to be presented transparently, i.e. it needs to clearly differentiate from the ordinary coverage layer. While we understand this is intended to promote transparency, the additional coverage layer could in practice add further complexity and undermine the comparability.

ACMA should consider standardising additional elements of the modelling process

The proposed standard requires the MNOs to adopt eight standard modelling assumptions, with the rest of the modelling assumptions and methodologies left for the MNOs' discretion. The ACMA acknowledges that while the proposed standard would reduce variability, there would remain some degree of divergence in MNOs' approaches. The ACMA noted the additional implementation cost and complexity as well as the short timeframe for the MNOs to implement any changes by 30 June 2026 as relevant considerations. The ACMA sought views on whether additional parameters should be specified.

There are some significant elements of the modelling process that are not currently proposed to be standardised in the proposed standard. These include the following:

- the type of propagation model used – it may be appropriate to consider using a standard model, such as the Standard Propagation Model based on empirical studies worldwide and developed by ITU and 3GPP, having regard to the extent to which this may have already been used by industry and the associated implementation cost;

- the approach to fine tuning the model – we understand that MNOs fine tune certain inputs of the model² based on their in-field measurements to reflect the local environment; variances in these inputs could reflect methodological differences in the way in which the MNOs undertake testing rather than actual differences. Short of specifying the actual inputs to be used in the model, the ACMA can provide high level guidance on how the MNOs should undertake the process of fine tuning the model such that the MNOs' approaches are broadly consistent.
- terrain and clutter data - these are environmental factors which do not reflect differences in the networks themselves. It is unclear providing MNOs with discretion to use different terrain and clutter data would necessarily improve accuracy of the modelling outcome.

The ACCC acknowledges the constraint noted by the ACMA in specifying additional parameters. However, we consider the material variances noted in relation to the parameters above could potentially lead to significant differences in the modelling outcome. This could mean that the coverage maps generated are not sufficiently comparable.

In addition, the purpose of standardising the parameters also encompasses ensuring that the parameters used are appropriate and lead to more accurate modelling outcomes. We encourage the ACMA to explore standardising additional elements of the modelling process, either within this process or in a forward-looking work program.

Publication requirements

More frequent review and update of coverage maps may be appropriate in the longer term

The ACCC supports the proposed requirement for the MNOs to review and update their coverage maps at least quarterly. The MNOs make changes to their networks over time and it is important that these changes are accurately reflected in the published coverage maps in a timely manner. Without this obligation, published maps may progressively become less accurate over time. The ACCC considers that the proposed quarterly update cycle balances the need to provide up to date information for consumers and the burden on MNOs to comply with the requirements of the industry standard at the initial stage.

However, the ACCC considers that once the MNOs have developed mature processes for producing and updating coverage maps, a shorter update cycle (for example, monthly) may be appropriate. More regular updates would allow consumers access to more up to date information to assist with informed decision making. It would also reflect the nature of the MNOs network investments which occur continually throughout the year. We support the ACMA considering whether the benefits of transitioning to a more frequent update cycle outweighs the cost. If it is beneficial, we consider that the ACMA could set expectations regarding transitioning to a more frequent update cycle in the future to provide incentives for the MNOs to develop efficient processes to update their coverage maps.

² These inputs generally represent how signal loss in an area depends on variables such as distance, frequency, clutter, foliage loss, heights of the base station and the device.

Coverage maps should be accessible more widely for analytical purposes

The proposed standard requires the MNOs to publish coverage maps in a manner that enables the data contained to be extracted by Emergency Service Organisations for analytical purposes. The ACCC supports this requirement in principle. However, we consider the draft industry standard should make clear what 'extracted' means, including what data/information can be extracted informed by the needs of Emergency Service Organisations.

We also consider the coverage maps should be made accessible more broadly for analytical purposes. The ACCC currently publishes mobile coverage maps provided to ACCC by the MNOs on an annual basis as part of its Mobile Infrastructure Report. A key purpose of the publication of the coverage maps is to provide additional transparency in how the coverage maps change over time. Increasing the availability of information assists stakeholders in making informed choices which is important for competition. Equally, providing more information about the level of investment and infrastructure reach assists policy makers to design responses to address poor coverage or quality of service as well as inform public debate.

We understand the coverage maps published under the Mobile Infrastructure Report have been widely used by various entities including state and local governments, consulting/private firms as well as emergency services who can download mobile coverage map geospatial files for their own analytical purposes. We also note that the published maps are used as part of the National Mobile Coverage Audit on an ongoing basis.

However, the coverage maps provided to the ACCC by the MNOs are provided at a point in time (31 January) each year and quickly become outdated by the time they are made available for download on data.gov.au. The coverage maps provided to the ACCC are considered protected information under section 155AAA of the *Competition and Consumer Act 2010* and certain criteria must be met before they can be publicly disclosed.

In light of this, the ACCC suggests that the standard requires the MNOs to provide capability to extract/download their coverage maps in a geospatial format directly from their website given they will be available on a more regular basis. Based on our experience, we consider there is substantial benefit in allowing all interested stakeholders, not just Emergency Service Organisations, to access the mobile coverage maps in a more timely manner for analytical purposes.

Ideally, the mobile coverage maps supplied by the MNOs to the mobile virtual network operators (MVNOS) should also be accessible for analytical purposes. The coverage areas an MVNO can access under a wholesale access agreement with an MNO does not always match what the MNOs provides to its own retail customers. For that reason, there is value in making available MVNO coverage maps which differ from the MNOs' own retail coverage maps.

The MNOs should be required to provide up to date maps to their wholesale customers

The ACCC supports the proposed requirement for the MNOs to provide updated maps to their wholesale customers (MVNOS and other MNOs).

Wholesale customers rely on accurate and current coverage information from their host MNOs to inform their own representations about their mobile services to consumers. When

wholesale customers do not receive timely updates, there is a heightened risk that their coverage claims lag behind real-world network changes, leading to outdated or inaccurate representations that mislead consumers and hinder effective competition in the retail market.

Other recommendations

Standard should clearly specify the limited circumstances that MNOs can publish multiple maps

The draft industry standard states that the MNOs must prepare a mobile network coverage map that provides a visual representation of the network coverage information of all relevant services using 4G or 5G. It also notes that a mobile network operator may prepare more than one mobile network coverage map.

The ACCC considers that the industry standard should clearly specify under what circumstances, if any, an MNO can publish alternative mobile coverage maps for 4G and 5G outdoor coverage other than in accordance with the technical specifications in the industry standard.

It is appropriate to allow the MNOs to prepare and publish multiple 4G or 5G outdoor coverage maps in circumstances where the plans they offer consumers are subject to different coverage or where certain types of coverage are only available on some plans. In fact, in such circumstances, the MNOs should be required to make clear the different coverage available to different plans in a manner that allows consumers to easily compare the difference.

However, as currently drafted, the draft industry standard appears to allow the MNOs broad discretion to represent alternative coverage map(s), in a manner of their choosing, in addition to that required in the industry standard. For example, an MNO appears to be able to prepare multiple maps to represent their 4G or 5G outdoor mobile coverage – one version that meets the requirements of the standard and one prepared under different technical assumptions. We consider such flexibility risks creating confusion for consumers and undermines the comparability of coverage maps, and as such should be explicitly prohibited.

MNOs' coverage representations must be based on the industry standard maps

Other than publishing coverage maps, MNOs may make broader coverage representations, such as the size of their coverage and how it compares to competitors. As indicated earlier, coverage is a significant factor that consumers consider in choosing their providers and it is important that consumer understand fully the basis of any coverage representation made and the associated caveats.

To mitigate the risk of strategic behaviour and facilitate informed consumer decision making, the ACCC considers that any coverage representations made by the MNOs should be based on the coverage map(s) produced in accordance with the industry standard. In addition, we suggest including an obligation that if MNOs are making specific representations on the quality of coverage that may be expected in an area (e.g. that consumers can expect "good" coverage over a certain area), the claims have to be based on the coverage levels on the industry standard compliant map.

Without this requirement, an MNO could conceivably rely on an alternative, more favourable map (whether or not they are published) when making marketing claims, effectively undermining the value of creating a standardised mobile coverage map(s) in the first place.

Regular independent audit of coverage maps is required to ensure confidence in compliance

To ensure confidence that the coverage maps published by the MNOs comply with the industry standard, the ACCC considers there is merit in requiring the MNOs to have their coverage maps audited by an independent third-party on a regular basis. This would require the audit to inspect the modelling of the MNOs and confirm that the modelling approach complies with the requirements in the standard in producing the published coverage maps.

While we recognise that this may impose some additional costs, the absence of independent verification would leave no effective mechanism to enforce the standard or determine whether operators are applying the required modelling parameters consistently.

In-field measurements should be used to improve and refine predictive modelling over time

While we agree with the ACMA that predictive modelling is more efficient in producing comparable coverage maps, we consider regular collection of in-field measurement samples from independent testing is important in improving the accuracy of predictive modelling so that they reasonably reflect on the ground experience. We understand that this is the approach taken in Ireland and the UK, where standardised approach to coverage prediction is also supported by sample drive test measurements and/or crowdsourced data.

For this reason, we consider there is an ongoing need for independent testing programs, such as the National Mobile Coverage Audit, or other forms of independent measurements. These programs can help to assess the ongoing appropriateness of the technical parameters specified in the industry standard.