



**Australian Government**

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**Department of Communications**

# **Mobile Coverage Programme**

## **Discussion Paper**

16 December 2013

# Contents

<b>Introduction</b> .....	<b>3</b>
Background.....	3
Programme funding.....	3
<b>\$80 million Mobile Network Expansion Project</b> .....	<b>4</b>
Delivery option 1 – Single mobile network operator contracted to deliver the programme .....	4
Delivery option 2 – Order of merit from base stations proposed by multiple MNOs.....	5
Delivery option 3 – Network infrastructure provider to co-ordinate implementation .....	6
<b>\$20 million Mobile Black Spots Project</b> .....	<b>8</b>
<b>Open access and co-location provisions</b> .....	<b>9</b>
<b>Proposed Assessment Criteria</b> .....	<b>11</b>
<b>Utilising the NBN fixed wireless network</b> .....	<b>13</b>
<b>Next steps</b> .....	<b>15</b>
Preparing Submissions.....	15
Lodging Submissions.....	15
Contact us.....	15

## Introduction

The Department of Communications is seeking input from the telecommunications industry, all levels of government and other interested stakeholders on the best way to deliver the Government's funding commitment of \$100 million (GST exclusive) towards a programme to improve mobile coverage and competition in regional Australia.

Submissions from stakeholders, including responses to the key questions raised within this Discussion Paper, will help inform the Government's consideration of potential methods of allocating the funding to ensure it best meets the policy objective and achieves maximum value for money.

Further information on the Government's consultation process can be found at page 15 of this Discussion Paper, including instructions on how to make a submission.

## Background

Inadequate mobile phone coverage remains a significant issue for Australians living, working and travelling in regional areas of the country. The 2011-12 Regional Telecommunications Review identified a lack of adequate mobile voice and broadband coverage as the issue of greatest concern to regional communities.

Australia's three national mobile network operators (MNOs) - Optus, Telstra and Vodafone Hutchison Australia - collectively claim to provide mobile coverage to 99 per cent of the population (i.e. premises). However, reflecting our country's highly urbanised population, this level of coverage equates to only around 25 per cent of the landmass. In addition:

- in some locations within the mobile coverage footprint, reception is only possible using additional equipment such as a car kit or external antenna – handheld reception is not available; and
- for significant portions of regional Australia where coverage is available, it is provided by only a single MNO.

The objective of the Mobile Coverage Programme is to invest in telecommunications network infrastructure to improve both coverage of high quality terrestrial mobile voice and wireless broadband services in regional Australia, and competition in the provision of such services.

This paper also includes discussion on the role that the NBN fixed wireless rollout can play in enabling greater competition for mobile services in regional Australia (see page 13). A greater role for NBN Co in supporting mobile wireless outcomes would complement the Mobile Coverage Programme.

## Programme funding

The Government's \$100 million funding commitment to the Mobile Coverage Programme includes two complementary components:

- **\$80 million Mobile Network Expansion Project:** to improve mobile coverage along major transport routes, in small communities and in areas that are prone to experiencing natural disasters.
- **\$20 million Mobile Black Spots Project:** to improve mobile coverage in locations with unique coverage problems, such as areas with high demand for services during seasonal holiday periods.

## \$80 million Mobile Network Expansion Project

Three broad options have been identified for the design of this component of the programme.

### **Delivery option 1 – Single mobile network operator contracted to deliver the programme**

Under this option, the Commonwealth would call for bids from MNOs or consortia of MNOs. The bids would specify the number of proposed mobile network base stations to be built Australia-wide, the location of the base stations, and the improved coverage that would be provided from these base stations, in exchange for receiving funding of \$80 million.

As part of each funding bid, the bidder would be required to specify:

- the total capital cost it would incur in building these base stations (and associated facilities such as fibre optic or microwave backhaul); and
- the amount to be contributed by the bidder in arriving at that total capital cost (in addition to the \$80 million to be contributed by the Commonwealth).

The bidder should also have regard for the list of locations established by the Commonwealth of areas that are reported to have poor, or no, mobile coverage.

The Commonwealth will prepare this list based on:

- representations made by citizens, organisations and elected representatives about locations which have poor, or no, mobile coverage;
- advice provided by state and territory governments; and
- mapping, drive test and other relevant data.

As part of the mandatory criteria, the selected MNO would be required to commit to:

- contributing significantly to the capital costs of the project;
- delivering voice and wireless broadband services in the agreed areas for at least 10 years;
- delivering the services at a specified minimum quality (see questions 1 and 2 on page 5 of this document);
- a range of open access and co-location provisions and arrangements for enforcing these, as described at page 9;
- an agreed timeframe for construction and operation of the services; and
- claw-back and make-good mechanisms to protect against non-compliance at any time during the 10 year duration of the agreement.

Bids would be required to identify the proposed locations at which new services would be provided (either by building new base stations or using existing base stations and infrastructure that is not currently used for mobile services, e.g. existing microwave towers). These locations would need to be in addition to locations already planned to be built in the next three years by the bidder. MNOs would be required to provide, in confidence, details of their mobile coverage extension expenditure and coverage achieved over the past three years and planned for the next three years.

The Commonwealth would assess the competing bids and would choose as the winner the bid which best meets the proposed assessment criteria on pages 11 and 12. The assessment process would make use of independent engineers who would test coverage and related claims in each bid, as well as an external assessment panel established to advise the Government.

### Pros and Cons

- Under this option, the whole \$80 million of Commonwealth funding would be awarded to a single MNO (or consortium of MNOs). Therefore, the locations selected would be determined solely from the bid from the successful MNO. The benefits of the Government's subsidy would initially accrue to this MNO (until other MNOs are able to benefit from the open access and co-location opportunities).
- Open access arrangements would enable other operators to co-locate their equipment at prices that reflect the Government's subsidy. However, a delay would be likely between establishment of the new infrastructure and the time that other MNOs take advantage of the open access arrangements.
- This "winner takes all" approach may not generate as much competitive tension for the available funding as options 2 and 3 (below).

### Questions

- 1. Would an appropriate minimum quality standard be that base stations must provide high-speed 4G LTE mobile broadband data communication services and also high quality 3G mobile voice and broadband data services? If this is not an appropriate minimum quality standard, what is?**
- 2. What are the most appropriate indicators that could be used to specify the minimum quality standards that should apply to the mobile services being provided through the programme? For instance, should it be a minimum received service signal indication (RSSI) in decibel-milliwatts (dBm)? A similar approach was adopted recently in the UK where a comparable programme specified a minimum RSSI for 3G voice and basic data service of -85dBm on roads and -75dBm in community areas (outside premises).**

### Delivery option 2 – Order of merit from base stations proposed by multiple MNOs

Under this option, the Commonwealth would call for bids from MNOs or consortia of MNOs. Each bid would be specific to an individual base station or group of base stations and would specify the number of base stations to be built, the location of each base station, the improved coverage that would be provided from each base station, and the amount of funding sought by the bidder under the programme. This would allow an MNO to bid for only a portion of the \$80 million funding.

Each base station (or group of base stations) proposed by each MNO would be assessed using the criteria at page 11 to establish a single order of merit. Base stations proposed by two or more MNOs that largely overlap the same area would result in the lower ranked proposed base station being removed from the order of merit.

A cut off point in the order of merit would be identified, being the point below which the available funding of \$80 million is expected to be exhausted. Contract negotiations would initially take place with MNOs for each base station (or group of base stations) ranked above the cut-off point.

If negotiations could not be satisfactorily concluded for one or more base stations above the cut-off point, then these base stations would be removed from the list. The highest ranked base stations that were below the cut-off point would accordingly now be above the cut-off point, and negotiations would commence in relation to the new base stations. The mandatory criteria in this option would be the same as those in option 1.

### Pros and Cons

- This option is likely to create greater competitive tension and therefore may lead to a better overall value for money outcome (compared to option 1).
- Other MNOs seeking to use the infrastructure would still need to negotiate terms and conditions with the successful MNO. As a result, the competition benefits may take time to be realised.
- Fewer economies of scale may mean the relative level of Commonwealth contribution is greater and the level of coverage extension is less than in option 1. However, this risk is mitigated by allowing bidders to apply for groups of base stations and the greater competitive tension during the tender process that this option creates.
- There would likely be a need to enter into funding agreements with multiple MNOs and therefore would be more complex to negotiate, administer and ensure compliance.

### Question

**3. Does delivery option 2 for the \$80 million Mobile Network Expansion component raise any additional issues that need to be considered?**

### Delivery option 3 – Network infrastructure provider to co-ordinate implementation

Under this option, the Commonwealth would call for bids from parties wishing to build, own and operate a network of base stations (and potentially other facilities such as fibre optic or microwave backhaul connecting the base stations). These base stations would be available to all MNOs to install their own network equipment on a commercial basis. Bidders might include specialist network infrastructure providers. Bids might be for proposals to either:

- a) build and operate mobile infrastructure (both base stations and linking backhaul) on which all MNOs could install their own network equipment on a commercial basis (i.e. MNOs contracting with the network infrastructure provider); or
- b) develop a wholesale mobile network capability onto which MNOs could roam locally on a commercial basis (i.e. MNOs contracting with the network infrastructure provider). This sub-option would involve the network infrastructure provider building the infrastructure as in sub-option 3(a) and also installing and operating suitable mobile network equipment that can provide the wholesale mobile service that MNOs can use for local roaming. A key issue with this sub-option would be the need for the successful bidder to provide a suitable wholesale service onto which MNOs can roam locally and the question of access to suitable spectrum.

Under both sub-options, network infrastructure providers applying for funding would need to demonstrate they had secured in-principle agreement from at least one MNO on:

- the locations at which infrastructure would be constructed to maximise outcomes in terms of the assessment criteria (at page 11); and
- use of these base stations on a commercial basis for a minimum of ten years.

As with options 1 and 2, bidders would need to specify the location of the base stations to be built, the improved coverage to be delivered, the total capital cost, the capital the bidder intended to contribute; and how the location matched the locations on the list specified by the Commonwealth. The bidder would also need to meet the mandatory criteria.

Bids for funding under these two sub-options would also need to identify each proposed base station (or group of base stations) as under options 1 and 2. These would also be assessed using the same criteria. There may not be a need to specify additional open access provisions beyond the existing facilities access regime as it is in the commercial interest of the network infrastructure provider to have multiple MNOs utilising the infrastructure. Key issues with this option would include:

- whether there would be merit in this option operating in conjunction with options 1 or 2, allowing network infrastructure providers to compete directly with MNOs for funding;
- whether wholesale access costs would need to be regulated (or whether the market would ensure the best outcome); and
- if option 3(a) was to be combined with options 1 or 2, the mandatory open access provisions would have to be identical for all bidders.

### Pros and Cons

- This option is likely to maximise competition benefits as it is in the interests of the network infrastructure provider to have as many MNOs operating on the infrastructure as possible.
- Option 3(b) would minimise costs of building and operating the infrastructure, as only one set of network equipment may be needed on each new base station.
- There are a number of uncertainties and risks with sub-option 3(b) that would need to be addressed (e.g. access to spectrum by the network infrastructure provider, capabilities of the infrastructure provider to run a wholesale service).

### Questions

- 4. Could options 3(a) or 3(b) for the \$80 million Mobile Network Expansion Project be delivered in conjunction with options 1 or 2 to enable network infrastructure providers to compete with MNOs?**
- 5. Should bidders be able to propose to incorporate the use of base stations owned by NBN Co as part of their bid?**
- 6. Should a joint bid (between a specialist network infrastructure provider and a MNO) be permitted? Should it be encouraged?**
- 7. Is it realistic to expect specialist network infrastructure providers to provide backhaul (recognising that they would presumably need to contract with a third party to provide this)?**
- 8. Is option 3(b) suitable for Australia's regional mobile market?**

## \$20 million Mobile Black Spots Project

The Mobile Black Spots Project will improve mobile phone services in locations with unique mobile coverage problems, such as small communities that experience increased population during peak seasonal periods.

This component of the programme will be implemented in three stages:

**Stage 1** involves (as foreshadowed under the \$80 million component) the establishment of a list of locations that currently receive poor, or no, mobile coverage, to which interested stakeholders can contribute (including local communities and local governments). The list of locations will be made available as part of the Request for Tender process under the \$80 million component. A number of locations put forward by local communities may be funded under this component, however there is no guarantee that funding will be available for all such locations.

**Stage 2** once the outcomes of the \$80 million component are publicly announced, Expressions of Interest (EOI) will be sought from local communities for locations that were not funded under the \$80 million component, but for which the local community is seeking improved mobile coverage. It is anticipated that EOIs will be received from local governments, however other entities such as significant local businesses may also submit an EOI.

All EOIs that are submitted at this stage must include a commitment to provide a co-contribution towards the proposed base station. This co-contribution could be provided, for example, by the local government, significant local businesses, large community groups, or the state or territory government. These co-contributions could be in the form of cash, or in-kind contributions such as site access or road and power installation.

**Stage 3** is envisaged to operate in a similar fashion to the \$80 million component, with bids being made by a bidding entity (MNOs and/or network infrastructure providers) for funding support towards a new mobile base station. However, a key difference is that under this component bidders may only propose new base stations from the list of locations that were nominated in the EOI process.

The Commonwealth would fund some of the costs of delivering improved mobile coverage to locations proposed by communities, with co-funding provided by other parties such as local governments, state or territory governments, commercial entities, MNOs and/or network infrastructure providers.

Bidders would be responsible for preparing the funding bids, including arranging for the necessary planning and approvals and securing necessary third party co-contributions. The mandatory criteria at page 4 would apply, as well as the assessment criteria at page 11.

In addition, the number of sites/rooms/cabins offered by accommodation providers in the area which will receive new coverage could form part of the assessment criteria for this component, to account for communities which experience high seasonal demand.

A cut-off point in the order of merit would be identified, being the point below which the available funding of \$20 million was expected to be exhausted. Contract negotiations would initially take place in respect of base stations ranked above the cut-off point.

If this component of the programme is undersubscribed, there would be an opportunity to review and potentially fund additional base stations applied for under the \$80 million component.

## Open access and co-location provisions

The proposed open access and co-location provisions<sup>1</sup> are as follows:

- **Base station design:** a provision could be included that all new (or “greenfield”) base stations are designed and built to ensure they are capable of supporting at least two further MNOs’ equipment. To meet this requirement, base stations would need to include site space for housing arrangements such as cabinets, as well as providing access to power.

Existing (or “brownfield”) base stations being upgraded to provide mobile coverage would not be required to meet this mandatory requirement.

The successful bidder/s would be required to maintain an online database on the status and progress of subsidised base stations. The required information could include the base station name, proposed location, key build milestones, and expected go-live dates. This would assist MNOs that are interested to make informed decisions about co-locating services.

The successful bidder/s would notify MNOs that have registered on the co-location database when they are ready to discuss base station location and design. To assist in the initial planning and design stages, MNOs would be required to advise the successful bidder/s within 20 days of being notified whether they wish to co-locate their equipment on the base station. MNOs seeking to co-locate their equipment must use all reasonable endeavours to work together with the successful bidder/s to co-ordinate the build activities to maximise efficiency and to reduce costs of any infrastructure being funded through the programme.

- **Base station access and pricing:** it is proposed that all new “greenfield” base stations should be made available for use by all MNOs. In addition, access to new “greenfield” base stations by MNOs seeking to co-locate their equipment on the base stations should be offered at a price which appropriately reflects the level of Commonwealth subsidy provided (which will be made publicly available).

MNOs will, in the first instance, be required to negotiate in good faith the base station access and price terms and enter into commercial arrangements. A starting principle could be that the base station access costs are shared equally between all MNOs using the base station.

Comments are sought from stakeholders on the most appropriate means of determining the price which sufficiently reflects the level of Commonwealth subsidy provided.

- **Backhaul access and pricing:** it is proposed that any new fibre backhaul being provided to new “greenfield” base stations must have sufficient capacity, transmission, and interfacing equipment to enable at least three MNOs to deliver the agreed services.

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<sup>1</sup> Recent international examples of open access requirements can be found at the following links:

- <http://www.med.govt.nz/sectors-industries/technology-communication/communications/broadband-policy/rural-broadband-initiative/rural-broadband-initiative-contracts>
- <https://www.gov.uk/government/consultations/mobile-infrastructure-project-industry-stakeholder-engagement>

Existing backhaul at “brownfield” base stations may not be required to meet this mandatory requirement.

Backhaul for each base station will be made available at a price which sufficiently reflects the level of Commonwealth subsidy provided (which will be made publically available).

For locations where a microwave or other type of backhaul solution is proposed for a base station that is not capable of providing a backhaul service to other MNOs, the base station design will need to enable other MNOs to co-locate a similar backhaul solution.

MNOs will, in the first instance, be required to seek to negotiate in good faith the backhaul access and price terms and enter into commercial arrangements. A starting principle could be that the backhaul costs are shared equally between all MNOs using the service.

### **Dispute resolution**

MNOs will be given the opportunity to appoint, at their own shared cost, an independent third party to mediate any disputes. If there is disagreement on the selection of the independent third party, the matter will be referred to the Department of Communications for a decision on the appointment of the arbitrator. For disputes relating to technical matters, the views of the independent third party mediator must be accepted. Contractual penalties would apply to an MNO that does not comply with this requirement.

For disputes relating to pricing, the ACCC could arbitrate where an operator seeking access believes the price offered does not sufficiently reflect the level of Commonwealth subsidy provided. Contractual penalties would apply to MNOs that do not comply with this requirement.

Comments are sought from stakeholders on the most appropriate means of determining the price which sufficiently reflects the level of Commonwealth subsidy provided.

### **Questions**

- 9. What are the appropriate specifications for a base station to be able to accommodate at least two other MNOs?**
- 10. Will the proposed open access provisions be sufficient to encourage other MNOs to use the base stations to provide mobile services?**
- 11. Should MNOs be required to pre-commit to/co-invest in the base stations for which they wish to share infrastructure?**
- 12. What is the estimated additional cost of requiring all new base stations to meet the open access requirements?**
- 13. Should the proposed open access provisions be applicable to base stations funded under the \$20 million component, or should there be scope to exclude some base stations from these requirements?**
- 14. What are the most appropriate models/benchmarks for establishing access and backhaul pricing, and for reflecting in that pricing the value of the public funding received by the owner of the facilities (such that access seekers receive an appropriate discount from the market price for access to the facility)?**

## Proposed Assessment Criteria

The following assessment criteria are proposed for each base station and group of base stations proposed for funding (some modification may be needed to suit particular options). These assessment criteria would be used by an external assessment committee as the basis of advice to the Government.

MNOs may propose the use of additional complementary technologies, such as microcells and picocells (which have a coverage radius of approximately 2km and 200m respectively) to improve service for particular areas within a proposed new 'macro-cell' base station footprint. For example, to extend new 'handheld' coverage to a small town which would otherwise lie outside the proposed 'handheld' coverage footprint of the particular base station. While the use of these types of complementary technologies would increase the overall assessed cost of the proposed base station, the additional coverage benefits would be included in the assessment of that base station.

Bidders must provide the following information for each proposed base station (to enable assessment of each proposed base station or group of base stations):

1. **Match with the priority programme locations** – each proposed base station (or single base station within a group) will be assessed according to whether it is located within one of the priority locations:
  - a. **\$80 million Mobile Network Expansion Project:** For a base station included within a bid for this component, whether it improves mobile coverage along major transport routes, in small communities and in areas that are prone to experiencing natural disasters.
  - b. **\$20 million Mobile Black Spots Project:** For a base station included within a bid for this component, whether it provides coverage to improve mobile coverage in locations with unique coverage problems, such as areas with high demand for services during seasonal holiday periods.
2. **New coverage** – claims of additional coverage will be tested by an independent engineering organisation appointed by the Department. Each proposed base station (or group of base stations) will be assessed according to the extent of totally new proposed coverage (i.e. areas not covered by any MNO - either existing or currently planned) using the following sub-criteria:
  - a. The size (in square kilometres) of the mobile coverage footprint area which will receive new 'handheld' coverage where previously there was no coverage at all.
  - b. The size (in square kilometres) of the mobile coverage footprint area which will receive new 'external antenna' coverage.
  - c. The size (in square kilometres) of the mobile coverage footprint area currently receiving 'external antenna' coverage which will receive new 'handheld' coverage.
3. **Extent of coverage benefit** – each proposed base station (or group of base stations) will be assessed according to:
  - a. The number of premises located within the new mobile coverage footprint (as assessed using the current G-NAF - the authoritative index of geocoded Australian addresses).
  - b. The length of national or state highways and arterial roads (as defined by PSMA Australia Ltd) within the new 'handheld' and 'external antenna' footprints (in kilometres).

- c. *[For the \$20 million component only]* The number of sites/rooms/cabins offered by accommodation providers (for example, motels or caravan parks) within the new 'handheld' and 'external antenna' footprints.
- 4. Co-contributions** – each proposed base station (or group of base stations) will be assessed according to:
- The amount of co-contribution being provided by the bidder.
  - The amount of co-contribution being provided by the relevant state or territory government or other third party. Bidders will need to consult with the relevant state and territory governments to determine and secure their level of co-contribution for each base station.
- 5. Value for money to the Commonwealth** – each proposed base station (or group of base stations) will be assessed according to:
- The cost to the Commonwealth per square kilometre of coverage provided by the base station/s.
  - The cost to the Commonwealth per premises covered by the base station/s.
  - The cost to the Commonwealth per kilometre of national or state highway and arterial road covered by the base station/s.
- 6. Open access** – each proposed base station (or group of base stations) will be assessed according to:
- The capacity of the new base station/s to support three network operators' equipment. See the Open Access Provisions at page 9 for further information on this requirement.
  - The capacity of the new fibre backhaul available at the base station/s to enable three network operators to deliver the minimum mandatory service solution. See the Open Access Provisions at page 9 for further information on this requirement.
- 7. Commitment from more than one MNO** – each proposed base station (or group of base stations) will be assessed according to the number of MNOs that have committed to utilising the proposed base station/s to deliver the mobile services on a commercial basis for a minimum of ten years.
- The minimum requirement for each proposed base station is a commitment from one MNO to deliver the specified services.
  - Additional weight will be given to base stations (or groups of base stations) where more than one MNO has agreed to deliver the specified services.

## Questions

**15. Do the proposed assessment criteria achieve the right balance to deliver the best value for money outcomes?**

**16. Should the proposed assessment criteria be weighted, and if so, how?**

**17. Is there a more effective means of assessing seasonal demand than proposed in criterion 3(c)?**

## Utilising the NBN fixed wireless network

The rollout of the National Broadband Network (NBN) fixed wireless network provides an opportunity to improve mobile phone coverage and competition in Australia. These opportunities include co-locating mobile equipment on NBN facilities and NBN Co offering additional services such as backhaul to mobile base stations.

NBN Co is already working with MNOs and mobile infrastructure providers to allow shared and 'build-to-suit' options and may be able to play a more active role in aligning common opportunities. In some instances, NBN Co has negotiated with MNOs to take advantage of existing mobile base stations in constructing its fixed wireless service. There is of course the potential for MNOs to take advantage of NBN Co's base stations and fixed wireless backhaul as these are rolled out further.

Although NBN Co has entered into agreements with some MNOs to share base station infrastructure, to date it has not been tasked explicitly with considering how it can assist in improving mobile coverage and competition. For example:

- NBN Co fixed wireless base stations could specifically be designed to support co-location of MNO's equipment on a commercial basis. While this may involve some marginal additional cost for NBN Co, this cost may well be outweighed by commercial returns;
- consideration of the precise locations of NBN Co fixed wireless base stations could be undertaken in consultation with MNOs to see if mutually beneficial locations could be identified, noting the benefits of early consultation given the significant lead times required; and
- in some circumstances, NBN Co could also sell backhaul to MNOs – given that NBN Co will be installing fibre or microwave backhaul to each of its base stations, it makes sense for it to sell backhaul capacity to MNOs.

There are locations where NBN Co is building new base stations for the delivery of fixed wireless services where there will be limited (or in some cases no) mobile coverage. Encouraging MNOs to co-locate their equipment or to participate in share-build arrangements would lower the cost of providing mobile coverage in these areas. NBN Co could play a more active role to encourage MNOs to work collaboratively to take advantage of these locations. If MNOs engage early in the process, there may be opportunities to negotiate mutually suitable locations and to incorporate their technical requirements in the design process.

Designing and building future NBN fixed wireless services to take advantage of the potential synergies with mobile services could mean the significant investment in the NBN telecommunications infrastructure is used more efficiently and effectively. Of course, in the areas which are to receive fixed wireless coverage from NBN Co, there may already be mobile coverage from one or more MNOs (the fixed wireless network will cover the 93<sup>rd</sup> to 97<sup>th</sup> percentile of the population, and in many cases these are not particularly remote parts of Australia). There may still be benefit however, through allowing MNOs to use NBN Co's base stations, for example by making it easier for a second or third MNO to offer mobile coverage in an area. This would deliver increased mobile competition even though it would not increase the total area where mobile coverage was available.

### Questions

**18. To what extent would the use of the NBN fixed wireless network result in improved mobile coverage outcomes in regional Australia?**

- 19. How best can a greater role for NBN Co improve competition and choice for consumers in regional Australia?**
- 20. In addition to base station location, design and backhaul access, what other considerations would NBN Co need to take into account if it were to also support mobile coverage and competition benefits as part of its mandate?**
- 21. How can early engagement between NBN Co and MNOs be facilitated in the design of each base station? Is there a role here for the Australian Mobile Telecommunications Association (AMTA)?**
- 22. How can the Mobile Coverage Programme best complement any role that the NBN fixed wireless service plays in improving mobile coverage and competition?**

## Next steps

### Preparing Submissions

All interested stakeholders wishing to have their views considered by the Government on possible implementation methods of delivering the Government's Mobile Coverage Programme are invited to provide a submission to the Department. All submissions must include the name and contact details of the person making the submission and the organisation which they represent (if applicable).

All submissions and comments, or parts thereof, will be treated as non-confidential information unless specifically requested, and acceptable reasons should accompany each request. Email disclaimers will not be considered sufficient confidentiality requests.

Respondents lodging a submission should be aware that submissions (excluding any information agreed to be treated as confidential information) will be made publicly available, including on the Department of Communications' website. Submissions and comments will be subject to freedom of information provisions. Despite a submission being identified as confidential or sensitive, submissions may be disclosed where authorised or required by law, or for the purpose of parliamentary processes.

Submissions should be accompanied by the Submission Cover Sheet which is available at [www.communications.gov.au/mobile\\_coverage](http://www.communications.gov.au/mobile_coverage) and be submitted via email (in MS Word or PDF) or by post (see below). Questions raised in this Discussion Paper are intended as a guide only. The Submission Form template enables respondents to provide more general comments on the issues raised in this paper.

### Lodging Submissions

Email submissions are to be sent to the following email address:

**Email:** [mobilecoverage@communications.gov.au](mailto:mobilecoverage@communications.gov.au)

Alternatively, submissions may be sent to the postal address below to arrive by the closing date:

**Post:** The Manager  
Mobile Coverage Programme  
Department of Communications  
GPO Box 2154  
CANBERRA ACT 2615

The closing date for lodging submissions is **5:00pm Friday 28 February 2014**.

All submissions lodged will be acknowledged by the Department of Communications by email (or by letter if no email is provided). Respondents lodging a submission who do not receive acknowledgement of their submission should contact the Department. Submissions which are not acknowledged by the Department as being received may not be considered. Respondents should be aware that emails greater than 10Mb may not be successfully delivered.

### Contact us

For further information about the Government's Mobile Coverage Programme or to discuss any elements of this Discussion Paper, please contact the Department of Communications via the above email address or by phone 1800 113 486.