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[Inquiry into co-investment in multi-carrier regional mobile infrastructure](#)

“On 12 September 2022 the Minister for Communications, the Hon Michelle Rowland MP, asked the Committee to inquire into and report on the experience, opportunities and challenges for co-investment in multi-carrier regional mobile infrastructure.”

Thank you for the opportunity to make a submission about this important subject and especially the permission to provide a late submission.

This is a subject, which is especially crucial for all those of us living in rural Australia.

Terms of Reference

“The House of Representatives Standing Committee on Communications and the Arts will inquire into and report on the experience, opportunities and challenges for co-investment in multi-carrier regional mobile infrastructure.

The Committee will:

- 1) Report on the costs, feasibility and public benefits associated with the deployment of
 - a. infrastructure which supports a single mobile carrier, and*
 - b. the various models for infrastructure which supports multiple mobile carriers;**
- 2) Report on community views on single carrier vs multi-carrier outcomes; and*
- 3) Report on examples of successful multi-carrier outcomes and their applicability in the Australian context.*

According to the Minister, matters relating to national security are out of scope for this Committee.”

This submission supports multi-mobile carrier outcomes and co-investment options which must result in an improvement to rural services.

I am a rural resident who lives in a rural locality, which is mostly out of reach of adequate mobile reception. I live in Reedy Marsh, a hilly place in the Meander Valley Municipality in Northern Tasmania. Reedy Marsh is home to about 200 people and 90 dwellings.

Like many other places in rural Tasmania, Reedy Marsh is regarded as bushfire prone. This means any new developments and dwellings must meet the bushfire code. This code provides a range of conditions for development. However there are many in Reedy Marsh whose existing dwelling does not meet bushfire code standards. Additionally the Bushfire Code contains no actual or implicit assurance of personal safety. Hence, since 2009's Black Saturday, for the personal safety reason, the current message is to: "Leave Early". But how does one know when to do so. Much of Tasmania is regarded as bushfire prone. If you do not know a fire is approaching how do you know when to leave?

A few years ago, the Tasmanian Fire Service initiated their Bushfire Safer Neighbourhoods program for Reedy Marsh. There was a proposal from the Western Tiers fire brigades coordinator that we (the residents) take responsibility and create emergency phone communications networks with a section and coordinator for each road in Reedy Marsh.

The local roads in Reedy Marsh, apart from the main access road, are all dead-end roads, narrow and fringed with forest. Reedy Marsh, settled in the mid-19th century, remains mostly a forested area with, many large residential titles (mostly zoned Rural Living) with the dwellings interspersed amongst the forest.

I volunteered to do that phone network task for my road. This seemed at first glance a good idea but an unforeseen problem arose for this emergency response initiative. What was that problem? In short, it was (and remains) poor or non-existent mobile phone reception and data reception as well to some extent.

Reedy Marsh is a hilly locality with a significant amount of tree cover, which probably reduces mobile reception to some degree. Additionally, Reedy Marsh has no mobile phone tower, despite covering a significant amount of land and significantly, containing about 90 dwellings and 200 people. Reedy Marsh is not alone with this black spot type reception problem in Tasmania.

So like many such areas across rural Tasmania, we are bushfire prone and hilly, thus we have an important need for communication, including at the time of emergencies but with no mobile phone tower and poor, patchy or completely absent mobile reception, we have a serious problem.

This is a far bigger problem than the one of the sharing of the towers. Sharing of towers should be fixed without rancour.

The existing landline phone network is wearing out. People everywhere are not taking up landlines any more as it is seen as an unreliable, under serviced and redundant technology. However, the replacement technology in places like Reedy Marsh is problematic.

Reedy Marsh is gradually expanding in population terms, though often the exact numbers are inaccurately reported. There is a definite level of available land which comes onto the market

at certain times. Whilst there is inadequate reception for mobile devices, the place is well under an hour's drive from Launceston and as little as 5 mins and up to 20 mins from Deloraine.

My property at the far North West end of Reedy Marsh was never served by a true landline phone. Up until 2021 my 'normal' phone was a VHF NEC analogue radio phone, battery operated, which had been installed by Telstra on the property since before I purchased in 1991, the technology being quite old. Recently this system on my property has been replaced by a Calyptech NGWL¹ system, which includes an aerial and a Cel Fi Go repeater/booster device² and operates off the mobile network on 3G. The 3G service works better over longer distances I am told. But 3G is going to be turned off in a couple of years. Telstra performed this work to upgrade my radio phone and retains my business.

It seems Telstra has been left to deal with customers such as myself and it is the only company providing suitable service for such residents. It should be recognised that this is an important impost upon Telstra, which has a public interest aspect attached. So, I still have what appears to be a landline but it runs off the mobile network. The roof mounted external phone aerial only just ensures adequate service from/to the tower which is at Coates Hill in Elizabeth Town.

For data, I have a satellite connection and for things like television, I also have a separate satellite service.

Currently I have no information about which carrier the residents have chosen or are currently using.

Many people here in Reedy Marsh have no adequate phone or Internet connection, either for every day purposes or for emergency purposes. To my mind that is unacceptable. Because so many people have poor to non-existent phone service, I claim there is a case for an upgrade of mobile services across the locality.

I suppose the point I am attempting to make is that I have a phone service, a fairly reliable one now, so I am making this submission not for myself, but for Reedy Marsh and especially for all the other places like Reedy Marsh which suffer from similar mobile phone reception problems.

Because there is no mobile tower here the issue of ensuring multiple service providers can have access to the tower does not arise. But clearly were there a tower, sharing the tower would be obvious and indeed essential. Indeed, I thought the tower on Coates Hill at Elizabeth Town was being shared.

¹ Next G Wireless Link

² Cel Fi Go is a type of booster device for MOBs, which is designed to work on a fixed site (such as at a dwelling) is dedicated to and limited to working with the phone service provider who supplies the device, which only works on their network. This is unfortunate. A Cel Fi Go operates over a limited area but they do solve a problem. They are unfortunately costly.

It is my strong view that all mobile towers should be able to have multiple carriers /providers infrastructure installed as a right. This is a 'no-brainer'. Towers are expensive and often a road of some sort needs to be constructed as well.

The legislation (with which I am not familiar), should ensure that such expensive infrastructure is shared in the public interest. In other words, I would suggest there could be no refusal by the tower owner. I do not know who owns all the towers. The Government could own the towers, or certainly the rural towers. But then there would need to be some sort of mandated use of the tower. I think that the bigger issue may be whether all the providers wish to provide an Australia-wide service.

Whenever I contact someone in rural Australia the subject of mobile phone infrastructure invariably comes up.

As an urgent priority, serious consideration should be given to the speedy rectification of the inadequate mobile phone reception problem across regional Australia. This may entail deploying a variety of solutions. Consideration should be given to making sure the technology works for phone, Internet and data transmission across all communities.

My experience as a rural resident is not unique, so my local example of Reedy Marsh is simply to try to give you an understanding of our reality.

I see the mobile network shortfall in rural areas as being potentially a life threatening inadequacy, especially in times of a natural disaster emergency.

Were there to be a serious fire in Reedy Marsh, on a windy day, late in the summer, for example, I have asked the following questions:

1. Would our current carefully designed and considered communication network phone and email tree/system work without hiccup? Would no one be left behind?
2. Were there to be a bushfire, would the first person to realise there is a fire, being the initiator of the phone network with a bushfire alert, actually be able to reach all the other residents by phone?
3. How could I or any other person initiating the phone/communication tree make contact with someone kilometres away who had either no phone reception or an almost non-existent phone reception?
4. How, including embracing any revised design of the communications network, in such a poor reception situation, could our local phone communication network successfully communicate to all the residents here?
5. How otherwise would people be warned of an impending approaching fire?
6. Without an effective and adequate warning system, how do they receive a warning to leave early? (Remember that leaving early is the approach which the Tasmanian Fire Service advises.)

We need modern efficient effective and reliable communications' infrastructure, urgently. That is the answer.

Reedy Marsh is sparsely populated with significant distances between residences and those distances are mostly forested and I would have no idea about their state were I to physically attempt to visit my neighbours. The road I live on (and at the end of) is a dead-end road. My nearest neighbour is some 2 kms away as the crow flies or 3 kms by road. In the event of a bushfire emergency I would not have the time to physically drive around the neighbourhood to make sure no one is left behind and it is highly probable no one else would have that luxury either. That is not a part of my bushfire emergency plan.

The above problem is what I consider to be an invidious one.

Reedy Marsh is a place with limited services in general. The electricity service is an Earth Return line, a single conductor running through the forest, suspended on wooden poles which criss-cross the local roads. This year there were two pole related fires down Larcombes Road. The power system is not bushfire proof but rather is bushfire hazard prone of itself. How stupid is such a system? It is obviously not fit for purpose. Cheap and nasty!

So, we have an electricity hazard - the electricity system itself and we have a very poor phone communication system. I hesitate to say, only in Tasmania! Because I know there are such problems elsewhere as well.

Because my neighbours have limited mobile phone reception, I have adopted the approach of emailing them. Not everyone looks at their emails all the time, so this is only a solution in a non-emergency circumstance. It is not a solution for bushfire emergencies.

I know one resident who has no reception who makes his phone calls and gets emails when he is visiting the nearby town of Deloraine, when he is doing his shopping.

I have retained my landline service and its reality, which I have already described earlier will make a difference for me personally but it comes at a cost. When one is paying for two phone systems this is an unwelcome impost. But without my landline service, I would have a negligible and unreliable reception at my premises.

I know another resident who went to the hardware store and purchased a plastic outdoor garden chair. He then carried it up the track into the public reserve, the Reedy Marsh Conservation Area, to a more elevated spot, which he told me is the place that gave him reliable mobile reception. The chair sits in the conservation reserve, beside the track, several hundreds of metres from this resident's dwelling. So he goes for a walk each day and stops up there at the garden chair, sits down and makes his phone calls, presumably ringing back all the callers who went to message bank, because simply he has no MOB reception at his rented dwelling. He rents, so it is not even viable for him to fix this problem. This should not be his problem. An adequate transition to mobile technology has yet to be diligently performed for rural Australians and rather the public interest aspects of the old system have shamefully been trashed.

I claim that an adequate phone service is a reasonable right of Australians. A phone service is required for all Australians.

In climate change terms people living in the country deserve to have adequate effective emergency communications that can meaningfully contribute to their greater safety.

The disparity between city services and any rural areas service away from the main highway routes is massive and needs an urgent upgrade.

The public interest obligations need to be strengthened for rural Australia, through our laws including rights for mobile phone communication services.

Australia is the most urbanised country on the planet. Australia needs policies which protect and halt rural decline. An adequate phone and data service is vital for rural Australians, to make sure no one is left behind. Rural Australia is being treated like the poor relations, yet rural Australia will be the part of Australia which will and indeed already is bearing the brunt of climate change disasters.

The State of Tasmania, comprised of some 335 islands is more densely settled, certainly across the main island of the State.

Despite being further south, Tasmania can experience catastrophic disasters such as bushfires and floods. Remember in 2013 virtually the whole town of Dunalley burnt down, and yet it is located right beside the sea. Do you remember the iconic photo of the family in the ocean, clinging to the jetty whilst the town of Dunalley burnt down in 2013?



I could argue that our higher density of decentralised dwellings across rural Tasmania might assist making more towers economical but I would rather suggest the system needs to change, allocations of more towers and funding for less economically viable towers needs to be prioritised through a fair and informed process urgently where there are threats to human safety.

Tasmania's hilly topography necessitates more towers. That hilly topography means that many people in rural Tasmania have a non-existent MOB service at their dwelling. And whilst the new 5G standard will assist those in cities with faster more salubrious services, it will make things worse for many in rural Australia.

In Conclusion

Under Climate Change during the Black Summer of 2019/20 the area of South East Australia was suffering an almost 1.5 degrees Celsius temperature increase over the long-term base pre industrial temperature.

“2019 was Australia’s hottest and driest year on record.³ The average temperature for the whole of Australia in 2019 was 1.5°C above the 1961–1990 climatological average, and 1.9°C above the 1911–1940 average, noting that the national temperature dataset commences in 1910.”⁴

In other words the fires which burnt to the water’s edge in so many places, which burnt down houses built to the bushfire code, which mostly could not be stopped, and burnt down an area of more than two whole Tasmania’s, all happened in a year which was 1.5 degrees Celsius hotter .

This 1.5 C is the stupid Paris target which Australia thinks will be adequate. Such a target will bring more catastrophic disaster.

Those disasters will require much better mobile phone technology for rural Australia. This is urgent. Australians deserve to be safe and feel safe too.

That in my view means that all towers must be able to be used by all providers. Government tower ownership would solve the problem, depending on how it is done.

It is clear the current mobile phone infrastructure recipe is for a neo-liberal sort of privatised network which is chasing more users and more profits. That sort of economic recipe has a very limited public interest aspect. I would describe it as faulty economics – not sustainable.

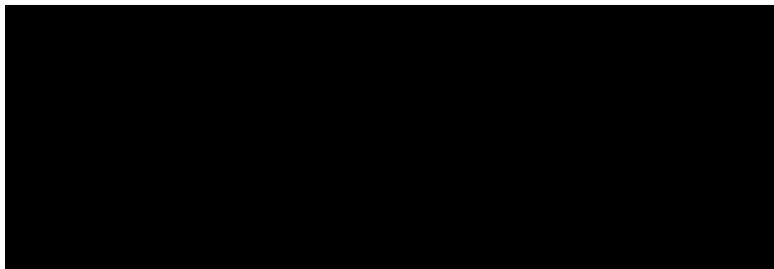
Do Australian citizens have some sort of a right to mobile phone service within their dwelling in the situation where the landline network is obviously being under-maintained and effectively discarded in rural localities? I think they do.

Do Australians who are at greater risk of catastrophic disaster deserve greater priority for mobile reception? I think they do.

If you consider Australian citizens do have such a right for this technology, which is obviously replacing the decaying landlines, ask yourself how is such a right expressed and articulated in the laws and policies of Australia?

Or are we out here in the rural wilds of Australia simply left behind?

Yours sincerely,



Andrew Ricketts

³ Bureau of Meteorology. Annual climate statement 2019.
(<http://www.bom.gov.au/climate/current/annual/aus/>, 2020).

⁴ <https://australianbushfiresandclimatechange.com/>