



AMTA submission to the Legislative Council's Standing Committee for  
Public Administration - Inquiry into regional telecommunications in  
Western Australia

30 April 2024



## About AMTA

The Australian Mobile Telecommunications Association (AMTA) is the peak industry body representing Australia's mobile telecommunications industry. It aims to promote an environmentally, socially and economically responsible, successful and sustainable mobile telecommunications industry in Australia. Please see [www.amta.org.au](http://www.amta.org.au)



## Introduction

AMTA welcomes the opportunity to respond to the Legislative Council's Standing Committee for Public Administration Inquiry into regional telecommunications in Western Australia.

The Terms of Reference were supplied to AMTA in a letter of 19 March 2024 from the Committee Chair and are as follows:

*'The Standing Committee on Public Administration resolves to inquire into and report on issues impacting regional telecommunications in Western Australia'.*

AMTA received an additional letter from the Chair<sup>1</sup> advising that given the broad terms of reference, the Committee resolved to write to stakeholders to provide further clarification on the issues they may wish to address in their written submission. Such matters may include, but are not limited to, the following:

1. Any thematic patterns observed regarding common issues or complaints in your region/s
2. Connectivity issues in your region/s
3. Any commonly raised issues from individuals, communities or industry
4. Issues in the instance of power outages, extreme weather events, or in emergencies
5. Any telecommunication issue impacting digital equity in your region/s
6. Any improvements or issues in your region/s resulting from Government regional telecommunications funding programs
7. Any observed improvements in your region if/where Automatic Transfer Switch (ATS) units have been installed at telecommunication towers
8. Suggestions for improving and/or monitoring outcomes for Government funded regional telecommunication programs.

On behalf of its members, AMTA makes the following submissions in response to the issues numbered 3, 4 and 6 above.

### '3. Any commonly raised issues from individuals, communities, or industry'

#### Closure of the 3G Network

Since 2019, Australia's mobile network operators have been preparing to switch off their 3G networks to boost the capacity, speed and reliability of their 4G and 5G networks. Telstra is planning to switch off its 3G network from 30 June 2024, and Optus from 1 September 2024. TPG Telecom/Vodafone has already switched off its 3G network<sup>2</sup>.

---

<sup>1</sup> Letter from the Chair to AMTA dated 8 April 2024

<sup>2</sup> <https://www.infrastructure.gov.au/media-communications-arts/phone/mobile-services-and-coverage/3g-network-switch> and <https://amta.org.au/3g-closure/>

As 4G and 5G network services become widespread, 3G network usage has declined significantly, and carriers around the world are closing down their older networks. AMTA notes that 4G and 5G networks in Australia are more efficient at delivering faster speed and capacity, which means better service and an enhanced mobile internet experience for users.

We note that the shutdown of the 3G mobile network and telecommunications services accessibility has been referred to the Senate Rural and Regional Affairs and Transport References Committee on 26 March 2024<sup>3</sup>, and we refer the Committee to AMTA's submission that will be provided to the Committee for any further information.

### Mobile telecommunications driving economic growth.

AMTA and its members recognise mobile telecommunications as a key economic driver in regional Western Australia.

Mobile networks are an 'enabling technology' across many sectors of the economy as evidenced in AMTA's publication '5G Unleashed: Realising the potential of the next generation of mobile technology', prepared by Deloitte Access Economics<sup>4</sup>. The report was commissioned to examine the economic impact of adoption levels of 5G-enabled technologies and innovations, and the policy and regulatory principles required to support accelerated adoption in other industries and sectors.

The report's economic modelling estimates 5G will increase Australia's GDP by \$67 billion by 2030 based on the current trajectory for adoption, however an additional \$27 billion can be realised by maintaining Australia's global leadership position through accelerated adoption – a 40% uplift in economic benefit over nine years.

The Key points for government in the report are:

- Australia is a global leader in 5G mobile but needs to accelerate uptake and investment to maintain its lead on other countries.
- If Australia can maintain its current position amongst global leaders, this creates an extra \$27 billion in economic benefits to GDP by 2030 by lifting business productivity.
- Key 5G policy priorities include driving adoption and facilitating private sector investment through spectrum and infrastructure policy, especially for regional areas.

### Planning for Mobile Telecommunications in Regional Areas

One of AMTA's top priorities is seeking to ensure that Government policies and regulations provide for the efficient and effective deployment of new and augmented mobile network infrastructure.

Whilst some of Australia's mobile telecommunications infrastructure is established using the Federal Government's 'Low impact' exemptions, there remains a substantial proportion that requires development approval from local government, which means navigating Western Australia's State and local planning rules and regulations.

With ongoing improvements being made to mobile networks, together with the rapid parallel deployment of the latest 5G networks, the time has never been better for Australia's State and

---

<sup>3</sup>[https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Rural\\_and\\_Regional\\_Affairs\\_and\\_Transport/3GNetworkShutdown](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/3GNetworkShutdown)

<sup>4</sup> <https://amta.org.au/5g-unleashed-deloitte-access-economics/>

Territory Governments to review and recalibrate their policy settings and planning rules to cater for improved mobile connectivity.

Under the broad banner of 'Planning' AMTA highlights the following matters and calls for intervention from the Western Australian Government.

The Mobile Telecommunications Working Group (MTWG) was established by the Commonwealth, State and Territory Planning Ministers in July 2023 to develop a national framework for prioritising/accelerating planning and approvals for larger communications infrastructure that enable mobile services, including towers and poles. We understand that Western Australia has participated in this process including in the Heads of Planning Senior Officials Group (HoP) and in the Planning Ministers' Meeting. It is hoped that the work of the MTWG will form the foundation of a coherent, national framework to prioritise/accelerate approvals of larger telecommunications infrastructure, and we encourage the Committee to review the outcomes once released. We anticipate that the recommendations of the MTWG will be consistent with planning reforms proposed as follows.

Western Australia has a State Planning Policy for telecommunications infrastructure, titled 'State Planning Policy 5.2 – Telecommunications Infrastructure, 2<sup>nd</sup> February 2022'. The policy applies throughout Western Australia in respect to above and below ground telecommunications infrastructure other than those facilities exempted under the Commonwealth Telecommunications Act 1997.

The policy outlines the State's position with respect to the importance and role of telecommunications infrastructure, which is intended to provide direction to local government for incorporation into local planning schemes and council policy documents. Unfortunately, it stops short of including state-wide exemptions like those found in Victoria and New South Wales, which would allow deployment in regional WA of certain non-obtrusive telecommunications facilities without an application for development approval, if conditions are met. It also does not compel Councils to follow the policy.

AMTA considers that there is an increasing need in Western Australia to remove reference to 'Telecommunications Infrastructure' from being a use 'not permitted' in certain zones in local Planning Schemes. The inclusion of 'telecommunications infrastructure' designated as an 'X' use is not permitted under SPP 5.2. Given the ubiquitous nature of mobile telecommunications, there is a need for service in all zones, and therefore the possibility that a facility will be needed. Therefore, at the very least, regional councils should allow carriers to lodge an Application for a facility and for council to apply its discretion as allowed for in policy when assessing an application.

AMTA has previously written to the State Government<sup>5</sup> seeking intervention in relation to these matters, and we note that these are also included as recommendations in AMTA's 5G State and Territory Readiness Assessment<sup>6</sup>. However, in response the State Government recommended that these matters be raised with each Council when they update their local planning framework every five years. Whilst the industry has raised these concerns with some councils, we are seeking State Government intervention to mandate the policies within SPP 5.2 across Western Australia.

We also note the importance of strategic forward planning for the provision of mobile telecommunications in regional Western Australia. It is critical that as regional centres and towns

---

<sup>5</sup> AMTA wrote to the Minister for Planning 31 August 2021 with a response received from the Minister on 18 October 2021.

<sup>6</sup> <https://amta.org.au/wp-content/uploads/2021/06/AMTA-5G-Readiness-Report-Digital.pdf>

grow that they factor in provision of mobile telecommunications irrespective of whether development is 'greenfield' or 'infill' development.

#### 'Telecommunications in new developments (TIND) policy'

The Albanese Government recently made its' expectations clear in this regard when it released a revised 'Telecommunications in new developments (TIND) policy'<sup>7</sup>.

The TIND policy sets expectations on developers of new residential developments with more than 50 lots, immaterial of whether the project will be implemented in stages. In summary these expectations are to:

- consider mobile connectivity as part of the overall development application process, with a similar level of importance as other utilities such as water, electricity and sewage.
- engage with a mobile network operator (MNO) and/or mobile network infrastructure provider (MNIP) as early as possible to ensure mobile coverage is in place prior to the selling or leasing of a building unit.
- identify or set aside one or more sites, or spaces, that are appropriate for mobile telecommunications infrastructure such as a pole or tower to be built upon.
- make all reasonable efforts to reach 'fair terms' in agreements with MNOs/MNIPs for access to land for the deployment of telecommunications facilities.

#### Delays in the connection of power to telecommunications sites

Power authorities and electricity distributors such as Western Power and Horizon Power (the Power Authorities) are responsible for the connection of power to telecommunications sites.

With the divestment or dilution in ownership of tower assets in the past two years, it is now often the 'Mobile Network Infrastructure Providers' (or 'MNIP's) that deploy 'passive' tower infrastructure.

The process requires the MNIPs and mobile carriers to make an application, which is then assessed, and connections are completed in accordance with the Power Authorities' processes.

Power connections to telecommunications infrastructure forms a critical part of the delivery of telecommunications services as without it, carriers are unable to deliver critical telecommunications services to customers.

AMTA understands that MNIP and carriers fall under the [small commercial connection \(westernpower.com.au\)](https://www.westernpower.com.au) pathway for the purpose of connecting telecommunications infrastructure to the power grid.

The general observation is that in some instances, connection times can range from 6 up to 18 months (after the design process) from the date of an application regardless of the location of the proposed telecommunications infrastructure. This can include connections to sites that have been funded as a blackspot.

AMTA therefore recommends that the Power Authorities should develop a framework to streamline engagement with MNIPs and carriers for connecting power for all telecommunications sites, especially for those sites that are:

---

<sup>7</sup> <https://www.infrastructure.gov.au/department/media/publications/telecommunications-new-developments>

1. located in a bushfire prone or natural disaster areas,
2. within an urban growth or peri-urban growth area (and which are required to be delivered in accordance with the Federal Government’s Telecommunications In New Developments policy<sup>8</sup>), or
3. subject to the Federal Government’s mobile phone base station blackspot funding or Peri-Urban Mobile Program.

AMTA also suggests that a framework should include mandated service levels agreements to help industry complete its power connections to telecommunications sites in a safe and timely manner that satisfies public expectations to have reliable access to telecommunication services.

#### ‘4. Issues in the instance of power outages, extreme weather events, or in emergencies’

The industry invests substantially in infrastructure, technology, and preparedness initiatives to mitigate the impact of natural disasters. This includes deploying backup power systems such as generators and battery backups to ensure continued service availability during disruptions.

Most mobile network outages during natural disasters are due to power loss. For example, following the 2019-20 bushfires, the Australian Communications and Media Authority produced a report on the impacts of the fires on telecommunications networks. It found that direct fire damage accounted for only one per cent of outage incidents, with the remainder caused by power outages<sup>9</sup>.

This means the mobile telecommunications industry is heavily reliant on a reliable power network to maintain service continuity. During natural disasters, mobile telecommunication providers actively engage with power providers to enhance coordination and resilience in power supply infrastructure. The mobile telecommunications industry has back-up solutions in place, but these are temporary solutions until power can be restored.

There is a Memorandum of Understanding (MoU) between the mobile telecommunications industry and the power industry<sup>10</sup>. The MoU targets effective collaboration between telecommunications and electricity networks and coordination of infrastructure in preparing for and responding to emergencies at a local, regional and state level.

No network can ever be 100 per cent disaster proof, and the mobile telecommunications industry continues to invest in equipment to respond quickly to natural disasters. Industry is also working with Albanese Government through the \$50 million Telecommunications Disaster Resilience Innovation (TDRI) program, to support and accelerate the development and deployment of new, innovative technologies and solutions to address known communications issues during natural disasters. We note that there are two concurrent rounds of funding under the TDRI Program and at

---

<sup>8</sup> <https://www.infrastructure.gov.au/department/media/publications/2024-telecommunications-new-developments-policy>

<sup>9</sup> [https://www.acma.gov.au/sites/default/files/2020-04/Impacts%20of%20the%202019-20%20bushfires%20on%20the%20telecommunications%20network\\_1.docx#:~:text=Most%20of%20the%20outage%20incidents,power%20does%20affect%20network%20resiliency.](https://www.acma.gov.au/sites/default/files/2020-04/Impacts%20of%20the%202019-20%20bushfires%20on%20the%20telecommunications%20network_1.docx#:~:text=Most%20of%20the%20outage%20incidents,power%20does%20affect%20network%20resiliency.)

<sup>10</sup> <https://commsalliance.com.au/Documents/releases/2016-media-releases5/2020-media-release-30>

the time of writing, industry is awaiting the outcome of Government's decision on funding following an application process in late 2023. The two rounds of funding are:

- The \$30 million Power Resilience Round which will fund solutions that strengthen the resilience of telecommunications against the impacts of power outages—the leading cause of telecommunications outages during natural disasters.
- The \$20 million Innovation Round which will fund innovative telecommunications technologies to improve the resiliency, redundancy and availability of telecommunications during and/or following a natural disaster.

Industry has also worked with the federal Government to deliver the Strengthening Telecommunications Against Natural Disasters (STAND) program, providing battery back-up for mobile towers and portable communications facilities across Australia. These assets have been utilised in recent natural disasters, including the December 2021 and January 2022 Western Australia bushfires, and Cyclone Seroja in Western Australia.

## ' 6. Any improvements or issues in your region/s resulting from Government regional telecommunications funding programs'.

AMTA welcomes the Western Australian Government's continued co-investment into improvements to regional mobile coverage.

We understand that to-date this has included an investment by the Government of \$125 million to expand mobile broadband resulting in a 60 percent increase in WA's mobile coverage area.

This investment has funded 460 new and improved mobile infrastructure sites across the State through the initial \$40 million Regional Mobile Communications Program (RMCP) and the current \$85 million Regional Telecommunications Project (RTP) This investment has resulted in the expansion of mobile broadband and a 60% increase in WA's mobile coverage<sup>11</sup>.

AMTA reiterates that to ensure timely delivery of infrastructure through programs such as the RMCP and RTP, the Power Authorities should develop a framework to streamline engagement with MNIPs and carriers for connecting power for all telecommunications sites and should include mandated service levels agreements for connections.

---

<sup>11</sup> <https://www.agric.wa.gov.au/econnected/mobile-connectivity-regional-telecommunications>