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Dear Secretary

Primary Producers SA (PPSA) appreciates the opportunity to comment on The House of Representatives Standing Committee on Communications and the Arts *Inquiry into co-investment in multi-carrier regional mobile infrastructure*.

Primary Producers SA (PPSA) is the peak industry body representing the interests of SA primary producers. PPSA current members are Grain Producers SA, Livestock SA, SA Dairyfarmers' Association, SA Forest Products Association, Horticulture Coalition of SA, and the Wine Grape Council of SA.

As the peak industry body representing the interests of SA primary producers, PPSA recognises the vital role that mobile telecommunications play in today's modern and increasingly technologically sophisticated primary industries sector. We see a key role for government to incentivise investment in digital connectivity to support South Australia's rural and regional communities and the primary industries sector.

On behalf of our membership, PPSA's interest is to highlight the public benefits and the imperative nature of mobile telecommunications to South Australia's regional, rural, and remote communities. We would also like to comment on outcomes achieved via potential infrastructure sharing and investment models for rural and regional South Australia.

PPSA is the South Australian member of the National Farmers Federation (NFF), and we support the implementation of the NFF Roadmap to exceed \$100 billion in farm gate value by 2030.

Key to achieving this target will be ongoing improvements to telecommunications and connectivity services in regional Australia. PPSA stands with the NFF in advocating for regional communities to have accessible, reliable, quality, and affordable telecommunications and connectivity services, and support all recommendations in the submission responding to this Inquiry by the NFF.

PPSA commends to the Committee the work of the NFF-led Regional Tech Hub. The Regional Tech Hub provides free, independent advice on telecommunications services and is a highly





valued service for South Australian producers and the wider regional, rural, and remote communities. Since its launch in December 2020, the Hub has helped thousands of regional Australians. Last year alone, the Hub directly impacted over 10,000 people's lives and engaged with a further 100,000 by helping them get connected and stay connected. PPSA welcomes the recent announcement of additional Commonwealth investment into this service.

South Australian producers need accessible, reliable, quality, and affordable telecommunications and connectivity services to drive productivity and sustainability.

As one of the least densely populated states in Australia, South Australia, and the regionally based primary industries sectors battle to demonstrate the commercial incentive for network operators to invest in expanding the current mobile telecommunications network. The Mobile Black Spots Program (MBSP) has successfully delivered incremental improvements over time; however, we have been made aware by telecommunications providers that many gaps remain, as investment is often deemed commercially unviable.

Agricultural innovation and advancements are continuing, despite many areas of South Australia not being able to access them. Sustainable and profitable agriculture in South Australia is dependent on being able to access and make full use of digital innovations and efficiencies such as ag-tech applications, crop data analysis, animal health monitoring, to list just a few.

More importantly, there are many producers in South Australia who cannot conduct day-to-day business via phone without being at their home or office base. Modern agriculture is reliant on agile decision-making regarding areas such as marketing, purchasing, and weather forecasting. In some industries, the ability to make an agile decision while in the paddock could make a difference of thousands of dollars in return for produce.

The advent of low-orbit satellite technology is an exciting development, and many producers in South Australia are exploring how this may assist them in achieving greater connectivity. PPSA is open to exploring how this, and other innovative digital technologies can be rolled out equitably to deliver greater connectivity.

South Australian producers need accessible, reliable, quality, and affordable telecommunications and connectivity services to provide life-saving assistance in times of emergency.

Despite being the major north-south corridor for freight and an increasing number of tourists from Adelaide to Darwin, the Stuart Highway continues to be plagued with black spots. This is more than an inconvenience to tourists looking to upload photos of the amazing landscape. This is a continuing cause of angst and anxiety for the residents of the surrounding area. All too often it is local producers and their staff who are the first on the scene of emergency incidents. With no mobile service, they are faced with the decision to stay at the incident or drive to gain service.



Likewise, in more concentrated farming areas where bushfires necessitate a coordinated community response, limited coverage and capacity often means that while calls are not of a triple-zero nature, essential coordinating calls cannot be connected. As identified in the recent *ACCC Consultation Paper*, temporary roaming arrangements are widely seen as a practical, and positive solution to this vital issue, and PPSA would support any such policy.

South Australian producers need investment in infrastructure that delivers connectivity outcomes and is appropriately incentivised

PPSA is supportive of infrastructure investments and incentives that increase connectivity to South Australian primary producers. Many models for infrastructure rollout have been proposed and trialled, both in Australia and overseas. PPSA observe that there is a need to ensure any investment from non-government sectors is incentivised and delivers commercial return on investment. Promoting commercial returns and competition promotes innovation, and innovation will ultimately benefit South Australian producers.

PPSA are aware of innovations in multi-carrier infrastructure sharing, particularly in the sharing of passive infrastructure (e.g., physical towers), with active components (transmitters etc) being carrier specific. These arrangements are ultimately of a commercial nature; however, they should be incentivised to avoid unnecessary infrastructure duplication in a local area.

Additionally, PPSA are supportive of arrangements such as the Multi-Operator Core Networks (MOCN) arrangements currently under consideration by the ACCC, which increasing the spectrum available to a provider, by sharing underutilised spectrum from another provider. We understand that by increasing spectrum availability congestion will be eased, which in turn increases the reach of mobile coverage. Telstra have reported that data traffic has increased up to three times on 2018 levels, putting strain on the capacity of the infrastructure to have the most effective and widest geographical reach. With increased spectrum it is understood that connectivity outcomes for South Australian producers will improve.

PPSA share the NFF's view that any arrangements should ensure the agreement provides medium and longer-term benefits to regional consumers.

Innovation is also occurring in technology other than mobile telecommunication towers. Regional South Australians have shared positive experiences with fixed and mobile 'boosters'. These devices are designed to amplify coverage and effectively extend the range of coverage to either a building or a moving vehicle. It has been claimed that use of these devices could extend coverage to more than 10,000km of highways across Australia¹. The prohibitive factor in greater adoption of these devices is the cost associated with purchase and installation. PPSA would

¹ [Telstra Submission - RTIRC 2021 Issues Paper - Final PUBLIC \(infrastructure.gov.au\)](#) p 15



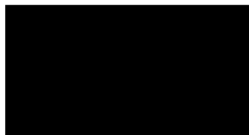
support any program that reduces the cost of these devices, and in turn would greatly increase connectivity outcomes.

Successful multi-carrier outcomes and their applicability in the Australian context

PPSA is not in a position to make specific comments relating to any successful multi-carrier outcomes, however we see significant merit in the Committee investigating overseas market examples as they relate to this inquiry. Identifying comparable examples of multi-carrier regional mobile infrastructure will assist in advancing South Australian producer connectivity outcomes.

If you, or the department have any queries regarding this submission, please feel free to contact Policy Director.

Yours sincerely



Caroline Rhodes

CEO