

## COUNTRYTELL SUBMISSION:

Thank you for the opportunity to make this submission. Countrytell is a small carrier using a mix of technologies, predominantly wireless, to deliver high speed and high capacity connectivity where larger entities such as NBN or the bigger carriers cannot or do not have coverage. This is usually due to the remoteness or lack of population in areas where the larger Carrier's business model's find commercially unviable. As a small and nimble entity, we are one of the wireless carriers that are the Gods of the Gaps (Wisp AU), filling in where other carriers cannot.

Regarding these IPART deliberations we find ourselves in agreement and support of our larger fellow colleagues who were in attendance at the IPART Consultation forum in July 2019, in particular;

- Axicom (disclosure – we are a client of Axicom)
  - Telstra Corporation v State of Queensland [2016], the Federal Court ruling against state authorities using private market benchmarks to set rental arrangements for Crown land – this should prevail
  - clause 44 of schedule 3 of the Telecommunications Act. Re parity between the users of communication sites with other commercial users of Crown land.
- Telstra
  - National Parks self-assessment methodology
  - Point to point installations being assessed as similar value to mobile sites
  - Varying size of sites, compounds, drop zones and huts
- Mobile Carriers Forum
  - the low category Crown land sites servicing very small communities, with very low populations, and economically challenged. This is of concern for Countrytell – we have remote sites with small populations (> 2000) which are now noted for decommissioning if the further imposts come to bear, such is the marginal viability.
  - We endorse the concept of a fixed rate of unimproved land value as being a fair, transparent and simple way for all users.
- Australian Radio Communications Industry Association.
  - Rural land ownership monopoly
  - Crown Lands as a landlord of last resort – or creating a no-go zone
  - Difficulty of access to radio sites
  - Disadvantage to small users/operators, community groups, volunteer organisations, public safety
  - Fees based on technology – which is ever changing
  - Value of productivity to communities, not just highest price, highest fees/taxes
  - Countrytell endorses the concept of negotiation with land management agency to enable deployment of marginal infrastructure
- Broadcast Australia
- Valuer Telco representative
- St George Amateur Radio Society
  - Uncertainty of rebate replacement
  - Community service and non-profit projects
- TELCO consultant.
  - Countrytell agrees the value comparator should be other Crown Land Users, not the private market
- Commercial Radio Australia.
  - disputed most of the comments and findings in the draft report
  - Broadcasting Services Act, mandates coverage, and as NSW owns 43% of land as Crown Land they are inevitably caught up with minimal choice/competition.

- Free TV
  - Changes proposed to rebates is probably retrograde
  - What is society/community benefit? Is it valued and how?

In summary, the impact on the small regional and remote operators and the increase in fees further erodes the viability of delivery of services to small underserved communities. In these communities our customers are often amongst a handful of business or industries which rely on high capacity communications for their productivity. Their productivity is often the key to a small village or community's existence. Existing landlines, limited NBN access and prohibitive costs of alternative infrastructure limit access and competition. Operating as a social enterprise, we reinvest our earnings into expansion of the network and services for small communities, but this is becoming increasingly difficult as prices rise. It is particularly galling in our circumstance as we commenced as a NSW sponsored project on the basis that access to Crown Land sites would be at community rates to improve viability. This commitment was changed mid-stream, and the increase in fees has decreased the long term sustainability of some of our small and remote sites, to the extent that their continuance is regularly under review.

If we can be of any further assistance, do not hesitate to contact.

Best regards

Lynda

