Submission on

IPart- Rental arrangements of communication towers on Crown Lands - 2018

Marine Rescue NSW (MRNSW) is a not for profit organisation which provides a 24 hour, Seven days a week public safety service. It is the position of MRNSW that the community rebate on all of the sites we occupy, whether primary or as a co-user must be maintained.

MRNSW consider further dialogue is necessary due to the significant financial impact the proposed changes would have on our organisation and therefore the public safety service that we provide.

MRNSW have identified several factors within the IPART Review (Rental arrangements of communication towers on Crown Lands 2018) documentation that would create a significant negative financial impact on our organisation, the full extent of which is yet to be quantified due to the lack of critical information.

The key issues are:

- The financial impact of the removal of Rental Rebates

- The financial impact of license charges based on area (m^2)

- Introduction of charges for existing installations

MRNSW Overview

MRNSW is committed to saving lives, and safety on the water is our highest priority – for both its volunteers and the boating public. More than 3,100 members in 44 strategically located Marine Rescue Units (MRU) provide a number of vital safety services to the NSW boating community.

In 2017-18 MRNSW conducted over 273,000 radio calls, over 74,000 vessel log on's, carried out more than 1,900 assists and 841 life-saving responses. Over 535,000 volunteer hours was invested into the monitoring of boater's safety within NSW (and border areas) on VHF radio. MRNSW core services include:

- 24/7 marine radio distress monitoring,
- Swift, coordinated marine emergency response, and,
- Boating safety education and marine radio licence courses for local boaters.

Marine safety radio services exist for the safety of boaters in NSW waters. MRNSW as a not-for-profit charitable organisation and is the only provider of a Marine Safety Communications Network in NSW. These services not only provide a 24/7 listening watch of distress and emergency VHF frequencies in the event that a boater encounters trouble on the water, but also provide navigation warnings, weather forecasts and severe weather warnings to enable the boater to make better-informed decisions about whether it is safe to go boating or stay out of the water.

Volunteers saving lives on the water

Specifically, MRNSW radio communications activities provide the boating community assistance through:

- Continuous 24/7 VHF radio coverage along the NSW coastline,
- A marine radio watch by providing a log on/off service to ensure boaters return home safely,
- Assistance to boaters in case of emergencies and breakdowns,
- The provision of weather forecasts and warnings at regular times, or any time upon request,
- Radio checks to assist boaters with verifying the strength and clarity of their radio signal,
- Emergency response (Search and Rescue) and medical assistance and coordination,
- Natural disaster warning/information dissemination (storm/coastal flood/tsunami).

MRNSW Communications Network
The MRNSW's communications network whilst established, is currently expanding as a result of an Operational Communications Review (and subsequent plan) established in 2014.

MRNSW provide the vital marine radio safety service utilising a variety of communications sites, including 56 Marine Rescue Radio Bases (MRBs)
Many of them are located on Crown Lands and are utilised for several uses (not just communications), including but not limited to;
       - Marine radio safety service operations
       - Search and Rescue related activities
       - Volunteer Training
       - Administration and Meetings
       - Volunteer Social Functions
      The size (m^2) of these MRBs varies greatly, as does the area and infrastructure specific to radio communications.

'Backbone' Communications Sites
Backbone Communications Sites are key radio infrastructure sites in high elevation locations designed to increase radio coverage out-to-sea in radio communications blackspots that aren't covered by MRB's. These 'Backbone' sites are varied in regards to the structures they are placed on and the owners of that infrastructure. For sites that MRNSW do not hold a Primary User Licence, MRNSW are unaware of the specific licensing arrangements that any Primary Licence holders may have with Crown Lands for these sites.

Review of Recommendations
MRNSW request IPART consider our observations regarding the following specific recommendations:

Recommendation #2
For existing sites, the land management agencies implement the schedule of rents for all primary users other than telephony service providers (SCAX) shown in Table 5.1, where rent per site varies by location.
Response: MRNSW are currently only able to maintain the communications network because of the rebate offered to our organisation. MRNSW believe that any increase in fees would be overwhelmingly detrimental to our ability to sustain this network. We prefer that MRNSW keep the current rebate structure.

Recommendation #5
For new sites, the land management agencies implement the schedule of rents shown in Table 6.1, where rent per site varies by location and land size.
Response: MRNSW are concerned that facilities that are used for dual purposes such as our combined unit bases and radio rooms will attract increased licence fees even when the whole facility is not used for telecommunications purposes. We prefer that MRNSW keep the current rebate structure.

Recommendation #8

That co-users on existing and new sites be charged for any additional land they occupy outside the perimeter of the primary user's communication tower site on the per metre squared basis as shown in Table 7.1.

Response: MRNSW believe that introducing new charges for existing installations will cause significant adverse financial implications for MRNSW. We prefer that MRNSW keep the current rebate structure.

Recommendation #9

That the co-user rent be capped at the flat rent per site for primary users on existing sites in the same location category.

Response: MRNSW believe that any fee schedule imposed beyond a current rebate will cause significant adverse financial implications for MRNSW

Recommendation #14

That the Office of Environment and Heritage continue to set the rent for sites in national parks one location category higher that the site's actual category.

Response: **We prefer that MRNSW keep the current rebate structure. In which case this will not impact our operations.**

Recommendation #15

That infrastructure providers not receive a rental discount for communication sites on Crown land.

Response: **MRNSW are currently only able to maintain the communications network because of the rebate offered to our organisation. MRNSW believe that removing the rebate would be overwhelmingly detrimental to our ability to sustain this network. We prefer that MRNSW keep the current rebate structure.**

Recommendation #16

That the current rebates for Community Groups, Budget Funded Sector, Local Service Providers, and Telephony Service Providers be removed. REVIEW OF RENTAL ARRANGEMENTS FOR COMMUNICATION TOWERS ON CROWN LAND from 1 July 2020

Response: MRNSW are currently only able to maintain the communications network because of the rebate offered to our organisation. MRNSW believe that removing the rebate would be overwhelmingly detrimental to our ability to sustain this network. We prefer that MRNSW keep the current rebate structure.

Recommendation #17

That the new rent schedule apply to all communication tower sites on Crown land from 1 July 2020.

Response: We prefer that MRNSW keep the current rebate structure. Our current funding from Government has been set in place until 2023. The budgets provided to government to support our funding have rents for MRNSW communications sites set at the rebated levels. Any increase in rents now will have significant financial implications for MRNSW.

Recommendation #19

That the NSW Government provide on-going financial assistance to those Community groups adversely impacted by our recommendations.

Response: We strongly agree with this recommendation and would prefer that MRNSW keep the current rebate structure. However, if the rebate structure is removed, MRNSW will still be reliant on ongoing financial assistance from the NSW government for the cost of renting communications sites.

Summary

MRNSW is a unique volunteer organisation providing an emergency service to the maritime community. The large financial impact of these recommendations on MRNSW cannot be ignored. Removing the current rebate will have an enormous impact on the funding of our organisation, and therefore a direct negative impact on the operation of the Maritime radio services we provide to the state of NSW. The review has also created uncertainty in what we may be charged for sites that are not solely for communications such as our combined operational and radio bases. Where we are a co-user on many sites, we will face uncertainty in budgeting when we cannot predict what the primary user will charge us 'site contributions' for usage of the area. **We therefore prefer that MRNSW keep the current rebate structure.**