

# NSW Volunteer Rescue Association Inc.

ABN 68 767 393 968

Office of the Commissioner, PO Box 4127, Dubbo NSW 2830



6 September 2019

Rental Arrangements for Communication Towers on Crown Land  
Independent Pricing and Regulatory Tribunal  
PO Box K35  
HAYMARKET POST SHOP NSW 1240

Dear Sirs

## **Submission regarding Review of Rental Arrangements for Communications Towers on Crown Land**

The mission of the NSW Volunteer Rescue Association ("NSW VRA") is the protection, preservation, and saving of human life, domestic animals, and/or property, and to promote the formation of Volunteer Rescue Organisations throughout New South Wales and encourage affiliation with NSW VRA.

NSW VRA has over 1500 volunteer members across 53 squads, including specialist rescue operators working for their communities across New South Wales. They are primary responders for Road Crash Rescue, General Land Rescue, Vertical Rescue and many types of specialist rescue encountered by Emergency Service personnel and primarily operate in rural and regional New South Wales. The NSW VRA also includes Aerial Patrol, Remote Area Communications, Cave Rescue, Ski Patrols, Swift Water Teams and other Rescue Support Teams.

NSW VRA funding comes from a mixture of Government grants and community fundraising and donations. The ability of the NSW VRA to raise additional funds from donations is very limited, especially at this time given the extremely difficult financial conditions the regional and remote areas of this State are suffering with the current ongoing and devastating drought.

The NSW VRA has radio licences at over 100 sites around the state, a significant number of which are on land which is the subject of this review. The NSW VRA will suffer additional financial burden if the recommendations are adopted. Radio is an integral part of NSW VRA communications in many rescue situations, especially where mobile phone coverage is either very limited or non-existent.

The NSW VRA currently has no budget that will allow for the significant increase in fees it will suffer if the recommendations in this review are implemented. If this burden was placed on the NSW VRA, it may have no choice but to remove the equipment on Crown Land. This may consequently impede the ability of NSW VRA to provide the lifesaving work done by its volunteers. Many of the areas in which the NSW VRA operates do not have mobile phone coverage. Additionally one-to-one type phone communications, if that were the only thing available, often cause delays in the type of communications needed for a rescue situation.

*NSW VRA - Any job, anywhere, anytime.*

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If the recommended fees are introduced then one of the following options will have to be chosen:

- Remove radio equipment from Crown Land with the effects mentioned above.
- The NSW VRA is exempted from these fees.
- The NSW Government provides additional funds to cover the additional costs faced by the NSW VRA.

The NSW VRA primarily provides service in regional NSW where access fees are expected to increase, unlike the high density areas where fees are actually to be reduced. At this extremely difficult time for the regional and remote parts of the State those areas will be disadvantaged and penalised through an increased financial burden and likely subsequent loss of service.

At some sites the NSW VRA is the primary user. At others it is a co-user with no footprint outside the primary user's installation. Fees in the first year are thus expected to range from \$508 per annum per site up to \$13,500 per annum per site.

At this point in time it has not been possible to gather full data for every affected site but at present we have accounted for up to 17 affected sites with at least 3 as primary user, with a total fee of approximately \$50,000 p.a. The NSW VRA has no capacity to absorb these additional fees into its budget, nor will individual squads be able to fundraise that amount of money in the current economic climate. This means that, unless exemptions or subsidies are available, then the NSW VRA will have to remove this equipment with a resulting detrimental impact on NSW VRA squads to service their local communities.

Yours faithfully

Kim O'Donnell  
Director of Services  
On behalf of Mark Gibson  
Commissioner  
NSW VRA

E: [commissioner@vrarescue.org](mailto:commissioner@vrarescue.org)

P: PO Box 4127, Dubbo NSW 2830