



WAGGA AMATEUR RADIO CLUB INC

████████████████████
President: James Ashley VK2NKJ
Vice - President: John Eyles VK2YW

████████████████████
████████████████████
████████████████████

26th March 2019

RE: Rental Arrangements for Communication Towers on Crown Land

The Chair,
Independent Pricing and Regulatory Tribunal

The following represents the views of the members of the Wagga Amateur Radio Club Inc. The Club is a not for profit, community based organisation whose goal is to advance the hobby of Amateur Radio in our area and to assist other community groups who approach us from time to time to provide them with safety or other communications for their activities. For example, annually, we assist with Wagga Wagga's Lake to Lake community fun run as well as provide the safety communications for the Hume & Hovell Ultra Marathon endurance run and the local car clubs' rallies. The last two events are conducted in remote bushland areas where alternative communication such as mobile phone is just not possible. We also provide training and assessment for amateur radio licensing on behalf of the Australian Maritime College who are the current contractors to the ACMA. Additionally, we provide our members and other amateur operators passing through the Riverina a means of communicating from their vehicles through a series of VHF repeaters as well as providing a number of community CB repeaters and these repeaters are generally located on communication sites that attract site rentals. The club receives no remuneration for any of its services and therefore any charges such as site rentals must be raised through Club member fees or other fund raisers. Additionally, members of our club, through their knowledge and experience gained in the hobby are able to assist other emergency organisations with their communications. For instance a number of our members are members of the Communications Brigade of the RFS Riverina Zone.

We wish to have input via this submission to the Tribunal as we are impacted by the rentals being charged and will outline this further in our submission.

We note that you have invited specific comments on those questions that are applicable to our organisation and the following is our response. We have no concerns regarding the making public of our submission.

Yours faithfully,

John Eyles
Hon Vice - President.
Wagga Amateur Radio Club Inc.

Attached: Submission.

Wagga Amateur Radio Club submission to:

Rental Arrangements for Communication Towers on Crown Land

1. **Proposed Approach.** We, being the members of the Wagga Amateur Radio Club Inc. (from here on referred to as the Club) Agree with IPART's proposed approach. The Club recognises that more sensible and consistent arrangements should be in place to allow the various Government agencies to receive fair rental for commercial communications sites. The Club feels that the present arrangements for groups such as ourselves are overly bureaucratic. IPART's original fee being set at \$100 (effective 2006), only to find Crown Lands inability to charge that amount under the Act. Over time the rental agreement has climbed with the application of the CPI to a figure that is now providing us with a large monetary burden. Therefore we request IPART consider whether the charges and any rebates are now becoming cost prohibitive for some community groups. Additionally, in our opinion there has been poor communication regarding the availability of rebates and the procedures under which they can be claimed. This has led to us never being aware that we could write to the relevant Minister to claim a further rebate as per table 5.2 P26 of this review document.

4. **Do Market based rents typically cover all services related to access...** In the main we disagree that the rents typically cover all services related to access. In particular our observation has been that rents have typically been collected and very little has been provided in return. For instance access management at some of the sites we have used or are aware of, track maintenance has been either non-existent or only responded to once an issue has been reported. We think that at the least, the rents for all users should have been ample to provide reasonable track maintenance and ease of access.

5. **What characteristics of a communication tower site are users more willing to pay for?** In our case the only characteristics of a communication site that interest us are location and the ability of the site to provide the radio coverage we require. As we are amateur radio operators there is no need for existing infrastructure as we can supply our own equipment to make the site operational.

10. **What is the appropriate rent discount for co-users?** The Club is of the opinion that Community groups that can demonstrate community use, are not for profit and could in no way recoup any operating costs then rental charges should be waived altogether. The process is unwieldy and it seems as the only charge on the land management organisation is the costs associated with managing our account and advising us of our yearly invoice. Remove those procedures and there is no cost to the relevant body.

12. **Does the current rebate system adequately address the benefits that community groups and government authorities provide to the public?** The

Club is of the opinion that firstly, the notion of one government agency charging another for public services they are providing (Police, Fire etc.) seems to be overly bureaucratic and therefore should be waived. For community groups the rental fee represents one more amount of money that has to be found and when such an organisation has only its membership to call upon (and with our hobby that is quite low - for instance ACMA amateur licences only amount to about 15,000 for the whole of Australia) it will become difficult to raise. And, as mentioned the cost benefit for an agency of a rebated rental must be very low.

16. Is the current approach of adjusting rents annually by the CPI appropriate?

The Club is of the opinion that for commercial purposes that is entirely appropriate for the major classes. Again, we reiterate our previous comments that the price rise though is a large impost for a small not for profit organisation.

17. Should the fee schedule continue to be independently reviewed every 5 years?

The club is of the opinion that yes, the fees should be independently reviewed on a regular basis and five years seems appropriate. However, again, one has to ask why IPART is charged with inquiring into and making recommendations and then they are ignored by the relevant agency. We draw your attention to page 4 of IPART's final report for 2005 where the Community based rental is set at \$100 irrespective of the site density only to have the Crown Lands Act prescribing a minimum of \$350. That amount has now grown to around \$540 by the application of the CPI. This has meant our club seek other means of supplying our communication needs. Had the \$100 been accepted by the relevant departments, we would have had far less difficulty finding the necessary rental money. Finally, the suggested rental of 1% of the fee would be more sensible and the club could investigate expanding its communication services network under such an agreement.