



## Public Consultation Document

**Telstra Reference No:** 41306  
**Payphone ID:** 08897544Y2  
**Address:** Outside Lot 268 Balamurra Street, Ngukurr NT 0852

It is proposed that a card only payphone be removed from:

**Outside Lot 268 Balamurra Street, Ngukurr NT 0852**  
**Payphone ID 08897544Y2**

The next nearest card only payphone is located at Lot 414 Mundoolooloo Street, Ngukurr NT 0852

Telstra intends making a final decision on this proposal by **28/02/2019**.

The removal proposal was prompted due to a vehicle accident that heavily damaged the payphone cabinet. On investigation, within this small community Telstra operates a total of 3 payphones. Usage of this payphone is extremely low with less than \$5 revenue generated from the payphone in the past 12 months. Local Police and Council staff have indicated no need to re-install the damaged payphone. Telstra is conducting the public consultation to engage the community formally for their comments on the proposal to remove this payphone. It is also noted that the community is serviced by good Telstra mobile coverage.

**Table 1:  
Legislative  
requirement  
Paragraph  
13 (1) (b) of  
the Payphone  
Public  
Consultation  
Determinatio  
n**

**Public Consultation Document—when maintaining the payphone at the site would not deliver a net social benefit to the local community**

**i) Telstra’s reasons for the payphone removal proposal including facts upon which the proposal is based**

**Why we are proposing to remove this payphone**

Telstra response:

Social benefit assessment (see ii below)	Increased likelihood of providing a social benefit outcome	Decreased likelihood of providing a social benefit outcome	Not applicable <sup>1</sup>
No. 1		✓	
No. 2		✓	
No. 3		✓	
No. 4		✓	
No. 5	✓		
No. 6	✓		
No. 7		✓	
No. 8	✓		
No. 9		✓	
No. 10		✓	
No. 11	✓		

**ii) to the extent that it is available, and it is reasonable for Telstra to disclose it, evidence proving those facts**

**Evidence to prove the facts upon which this proposal is based**

**Social benefit assessment no. 1:** Whether Telstra made a total net profit or total net loss (from operating the payphone) in the most recent 12 months from the date of assessment, and a description of the ‘reasonable steps’ that Telstra has taken to minimise the costs of maintaining the payphone, which may include the installation of a robust phone or card-only phone.

Telstra response:  
This criteria is rated as Negative.  
The ‘net loss’ dollar figure for the most recent 12 months was \$1722.52.

The current payphone cabinet is a Remote Area Cabinet that is our strongest cabinet available. The siting of the payphone is off the main road next to a power pole.  
The payphone is a card only phone to reduce operating costs that has been updated with our new Koala board and is at the current build standard.

**Social benefit assessment no. 2:** The total volume of calls for the most recent 24 months from the date of assessment, broken down into two 12-month periods.

Telstra response:  
This criteria is rated as Negative.  
Call volumes for the most recent 12 months totalled: 341. Call volumes for the 12 months prior totalled: 516. Therefore call volumes have been declining. It is noted that 99% of these calls are Free Calls

**Social benefit assessment no. 3:** Whether the revenues from the payphone ‘will cover’ or ‘will not cover’ the depreciation and maintenance cost of maintaining the payphone on an annual basis.

Telstra response:

This criteria is rated as Negative.

The revenue of the payphone will not cover the depreciation and maintenance cost of maintaining the payphone. The quote to replace the damaged payphone and cabinet is \$20,106.

**Social benefit assessment no. 4:** Whether the funding (if any) provided to install or maintain the payphone, including any payments made to Telstra by the Commonwealth ‘will cover’ or ‘will not cover’ the depreciation and maintenance cost of maintaining the payphone on an annual basis.

Telstra response:

This criteria is rated as Negative.

The funding of the payphone will not cover the depreciation and maintenance cost of maintaining the payphone.

**Social benefit assessment no. 5:** The name (if known) and type of each of the applicable community facilities or the name of any national parks located within a one-kilometre radius of the proposed payphone removal site.

Telstra response:

This criteria is rated as Positive.

Ngukurr being a remote indigenous community has community facilities with-in 1 km. These include a school known as Ngukurr Community Education Centre, a community store, oval and a Police Station.

**Social benefit assessment no. 6:** The applicable decile<sup>2</sup> the community falls into (for the purpose of this assessment) and a hyperlink to the specific source of this information.

Telstra response:

This criteria is rated as Positive.

The ABS data shows the community of Ngukurr is rated as a Decile 3.

<http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/2033.0.55.0012016?OpenDocument>

**Social benefit assessment no. 7:** Whether the proportion of the community—relative to the applicable state/territory average—that is aged 65 years or over is ‘above average’ or ‘below average’ and a hyperlink to the specific source of this information.

Telstra response:

This criteria is rated as Negative.

The ABS data shows the population of Ngukurr as having only 2.46% of residents greater than 65 years which is below the territory average.

<http://www.abs.gov.au/websitedbs/censushome.nsf/home/Census>

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<sup>1</sup> In some cases, social benefit assessments 4, 10 and 11 may not apply. For further information, please refer to the [Payphone \(Assessment of Net Social Benefit\) Guidelines](#).

<sup>2</sup> ‘Decile’ means any one of the numbers or values in a series dividing the distribution of the individuals in the series into 10 groups of equal frequency. The [Payphone \(Assessment of Net Social Benefit\) Guidelines](#) provide that for the purposes of social benefit assessment no. 6, Telstra should have regard to the Socio-Economic Disadvantage Index (prepared by the Australian Bureau of Statistics). This index is suburb based and derived from the most recent Australian census variables related to disadvantage, such as low income, low educational attainment, unemployment, and dwellings without motor vehicles.

iii)

**Social benefit assessment no. 8:** Whether the proportion of the community—relative to the applicable state/territory average—that is aged between 15 and 24 years is ‘above average’ or ‘below average’ and a hyperlink to the specific source of this information.

Telstra response:  
This criteria is rated as Positive.  
The ABS data shows the population of Ngukurr as having 19.6% of residents aged between 14 to 24. This is above the territory average of 14.96%.

<http://www.abs.gov.au/websitedbs/censushome.nsf/home/Census>

**Social benefit assessment no. 9:** Whether there is adequate mobile phone coverage<sup>3</sup> at the payphone site or no mobile phone coverage at the payphone site, and either a hyperlink to Telstra’s mobile phone network coverage map (the payphone site address details must be located next to the hyperlink) or the date on which Telstra tested the mobile phone coverage at the payphone site which must not be more than 3 months prior to the date the assessment is made.

Telstra response:  
This criteria is rated as Negative.  
Telstra has 4G coverage in and around Ngukurr. Optus and Vodafone do not offer a service.

<http://telstra.com.au/mobile-phones/coverage-networks/our-coverage/coverage-search/index.htm>

<http://www.optus.com.au/network/mobile/coverage>

<http://www.vodafone.com.au/aboutvodafone/network/checker>

**Social benefit assessment no. 10:** The distance in metres or kilometres (whichever is appropriate) to the next nearest Telstra-operated payphone, and a website address or hyperlink to the ‘Telstra Public Payphone Locator’ that shows the next nearest TELSTRA-operated payphone.

Telstra response:  
This criteria is rated as Negative.  
Telstra has 2 other payphones in Ngukurr. One approximately 300 meters away and another 400 meters away.

<http://envinsaonline.mapinfo.com.au/ppol/>

**Social benefit assessment no. 11:** The total number of genuine emergency calls<sup>4</sup> from the payphone concerned for the most recent 12 months from the date of assessment.

Telstra response:  
This criteria is rated as Positive.  
135 calls to emergency services have been made in the past 12 month. On discussion with Ngukurr Police, the majority of these calls were nuisance calls.

<sup>3</sup> The Payphone Location Determination defines ‘adequate mobile phone coverage’ as handheld terrestrial mobile phone coverage at street level in the relevant place or area. Mobile coverage maps are available on most service providers’ websites.

<sup>4</sup> For the purpose of these guidelines, a ‘genuine emergency call’ is an emergency call connected by the Emergency Call Person for Triple Zero (000) or 112 (currently Telstra) to an Emergency Service Organisation.

iv) a statement about which criteria under paragraph 20 (1) (b) of the Payphone Location Determination are considered to apply to the proposed payphone removal

### The criterion that applies to this proposed payphone removal

Telstra response:

Telstra

Telstra believes the repair bill of greater than \$20,000 is unwarranted to replace this payphone and cabinet as the existing site does not deliver a Net Social Benefit to the community. The two remaining payphones within the community will service payphone needs.

v) details of how a person can complain about the proposed removal of the payphone

### How a complaint (or a request for further information) may be made

Telstra response:

*Should you wish to make a complaint regarding the decision, it must be made within 20 working days of the final decision which will be posted on the Telstra Payphone website. Complaints can be made through the*

Telstra Payphone Siting Manager  
Locked Bag 4850 Melbourne Vic 3001  
or by calling us on 1800 011 433 selection Option 2  
or email [Payphones@team.telstra.com](mailto:Payphones@team.telstra.com)

*To make a written objection to the ACMA regarding a Telstra payphone complaint, it must be within 10 working days from when the primary universal service provider provided its written response to the complaint*

<https://www.acma.gov.au/theACMA/payphone-complaints>

Telstra advises that the personal information of the complainant may be disclosed to the ACMA for the purpose of resolving the objection.

vi) notification, for the purposes of the Privacy Act 1988, that should a person make a complaint, Telstra may be required to disclose the complainant's personal information (as contained in the complaint) to the ACMA

### Notification for the purposes of the Privacy Act 1988

Telstra response:

Telstra advises that the personal information of the complainant may be disclosed to the ACMA for the purpose of resolving the objection.