



Public Consultation Document

Telstra Reference No. 46483
Payphone ID. 02472930X2
Address Pendock Rd corner Progress Way Cranebrook
NSW 2749

It is proposed that a payphone be removed from:

Pendock Rd near car park Cranebrook NSW 2749
(Cab Id 02472930X2)

The next nearest payphone is located at: **28 Pensax Rd Cranebrook NSW 2749.**

Telstra intends making a final decision on this proposal by:
26th January 2022

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

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: Negative NSB

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

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 a **Negative**
The ‘net loss’ dollar figure for the most recent 12 months was: \$ 383.
The site had a Telebox type cabinet installed which is one suited to rougher areas and has a ruggedised phone

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 a **Negative**
Call volumes were declining for the most recent 24 months.
Call volumes for the most recent 12 months totalled: 508.
Call volumes for the 12 months prior totalled: 1073_____.

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.

¹ 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](#).

Telstra response:
This criteria is rated as a **Positive**
The payphone will cover the depreciation and maintenance cost of maintaining the payphone on an annual basis.

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 a **Negative**
The payphone will not cover the depreciation and maintenance cost of maintaining the payphone on an annual basis.

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 a **Positive**
There are many community facilities within one-kilometre radius. These include but are not limited to School, Preschools, Doctor, Pharmacy, Shops & Gym

Social benefit assessment no. 6: The applicable decile² 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 a **Negative**
The ABS data shows this community is rated as a Decile 6.
<http://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/2033.0.55.0012006?OpenDocument>

Social benefit assessment no. 7: Social benefit assessment no. 7—65 years and over: It is assumed that an above-average result—and a decile of 1 to 5 in social benefit assessment no. 5—would indicate an increased likelihood that the payphone would provide a social benefit to the local community. An above average result—and a decile of 6 to 10 in social benefit assessment no. 5—would indicate a decreased likelihood that the payphone would provide a social benefit to the local community. A below-average result would indicate a decreased likelihood that the payphone would provide a social benefit to the local community.

it is negative when decile > 5.

Telstra response:
This criteria is rated as a **Negative**
The ABS data shows the population of this community as having 7.824% of residents greater than 65 years which is above the state average of 16.27%
<http://www.abs.gov.au/websitedbs/censushome.nsf/home/Census>

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.

² ‘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.

Telstra response:
This criteria is rated as a **Positive**
The ABS data shows the population of this community as having 15.083% of residents aged between 15 to 24 which is below the state average of 12.53%
<http://www.abs.gov.au/websitedbs/censushome.nsf/home/Census>

Social benefit assessment no. 9: Whether there is adequate mobile phone coverage³ 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 a **Negative**
There is adequate mobile coverage of all carriers present in this locality.
<http://telstra.com.au/mobile-phones/coverage-networks/our-coverage/coverage-search/index.htm> Pendock Rd nr car park Cranebrook NSW 2749
<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.

NOTE: When site has mobile coverage, we will not consider closest distance & emergency calls in nsb calculations.

Telstra response:
This criteria is rated as N/A.
<http://services.mapinfo.com.au/ppol/welcome.do>

Social benefit assessment no. 11: The total number of genuine emergency calls⁴ from the payphone concerned for the most recent 12 months from the date of assessment.

NOTE: When site has mobile coverage, we will not consider closest distance & emergency calls in nsb calculations.

Telstra response:
This criteria is rated as N/A.

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

The criterion that applies to this proposed payphone removal

Telstra response:
This payphone does not deliver a Net Social Benefit to the community. Also, with the number of faults and current requirement to replace the cabinet maintaining the payphone at the site would not deliver a net social benefit to the local community.

payphone
removal

iv) 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 Payphone.Solutions@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

http://www.acma.gov.au/WEB/STANDARD/pc=PC_2817

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

v) 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.

³ 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.

⁴ 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.