



## Public Consultation Document

**Telstra Reference No:** 53880  
**Payphone ID:** 02447620X2  
**Address:** 43 Dalmeny Drive (corner Surf Beach Road)  
Kianga NSW 2546

It is proposed that a payphone be removed from outside:  
43 Dalmeny Drive (corner Surf Beach Road), Kianga NSW 2546  
(Payphone ID: 02447620X2)

The next nearest payphone is located outside:  
48 Princes Highway Narooma. NSW 2546  
(Payphone ID 02447610X2) which is approximately 2 kilometres from the current site.

This removal has been prompted by Telstra as the payphone is not delivering a Net Social Benefit to the local community.

Telstra intends making a final decision on this proposal by: **8<sup>th</sup> April 2024.**



## 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's 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 total net profit/loss for operating and maintaining this payphone for the most recent 12 months was Negative.

**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 24 months. Call volumes for the most recent 12 months totalled: 543. Call volumes for the 12 months prior totalled: 568.

<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 - 2014 | ACMA](#)



**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 Positive.

The revenue from this payphone does 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 Positive.

The funding for this payphone does 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 Negative.

There are no known community facilities located within a one-kilometre radius from this payphone.

**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 Negative.

The ABS data shows this community is rated as a State Decile 6.

[People | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/People)

**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.

---

<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 - 2014 | ACMA](#) 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.



The ABS data shows the population of this community as having 38.2% of residents aged greater than 64 years which is higher than the state average of 17.64%.

[People | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au)

**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 Negative.

The ABS data shows the population of this community as having 6.39% of residents aged between 15 and 24 years which is lower than the state average of 10.63%.

[People | Australian Bureau of Statistics \(abs.gov.au\)](https://abs.gov.au)

**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.

There is currently mobile coverage available from any of the major three carriers.

[telstra.com.au/mobile-phones/coverage-networks/our-coverage/coverage-search/index.htm](https://telstra.com.au/mobile-phones/coverage-networks/our-coverage/coverage-search/index.htm)

(Payphone address: 43 Dalmeny Drive corner Surf Beach Road, Kianga. NSW 2546)

[www.optus.com.au/network/mobile/coverage](https://www.optus.com.au/network/mobile/coverage)

[www.vodafone.com.au/aboutvodafone/network/checker](https://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 Not Applicable when this has mobile coverage, this criteria is not measured.

The next nearest Telstra operated payphone is located approximately 2 kilometres away outside 48 Princes Highway Narooma. NSW 2546 (Cabinet ID: 02447610X2).

[Find us - Telstra](#)

**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 Not Applicable when this has mobile coverage, this criteria is not measured.

---

<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.



- iii) 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:

Maintaining the payphone at the site would not deliver a Net Social Benefit to the local community.

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

*How a complaint (or 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

[www.acma.gov.au/payphones](http://www.acma.gov.au/payphones)

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.

<sup>5</sup> Telstra is also required to comply with the Payphone Complaint Rules Determination.