

29 November 2016

**To: The Secretariat
ACCC Domestic Mobile Roaming Declaration Inquiry 2016**

From: Canberra Business Chamber and the Canberra Region Joint Organisation

Re: ACCC mobile roaming inquiry

The Canberra Business Chamber services 5000 members directly and indirectly in the ACT and in the surrounding NSW commercial centres.

The Canberra Region Joint Organisation (CBRJO) represents 9 Councils in South-East NSW. The member councils include Bega Valley Shire Council, Eurobodalla Shire Council, Goulburn Mulwaree Council, Hilltops Council, Queanbeyan-Palerang Region Council, Snowy Monaro Regional Council, Upper Lachlan Shire Council, Yass Valley Council and Wingecarribee Shire Council. The ACT Government is also a member of the Joint Organisation.



The total population of the CBRJO region including the ACT is 650,000 and the total area of the region is 48,000 km².

The region produces and supports a wide range of primary industries including high quality meats, fine wool, dairy, horticulture, fishing and forestry.

Tourism is a significant and growing industry across the whole region, with health, education, public administration and construction being the main employment sectors in the ACT and Queanbeyan.

Our communities see mobile coverage and investment in new technologies as one of their highest priorities to assist the growth of our industries and provide further employment opportunities in our region. Functional access to mobile coverage at an appropriate standard is also critical to support social equity and to assist with emergency management situations.

There are widespread areas across the region where mobile coverage is inadequate however the Telstra coverage is far greater than any other telco provider. It is imperative that we have a policy that encourages further investment in regional areas to increase mobile coverage and ensure that new technologies such as 4G or 5G can be effectively used by residents and visitors.

The regulation of mobile roaming would support our increasing tourism industry as it would be ideal for our visitors with Optus, Vodafone and other similar providers to be able to enjoy the same coverage as currently exists with Telstra.

Our concern with roaming regulation is that it may discourage further investment by Telstra in regional Australia to improve mobile coverage. It would seem unlikely that other carriers will fill the gap in investment unless policy is implemented together with changes in regulation to promote increased investment in regional areas.

Right now, many areas of our Region have 4G but there are many gaps and the service level is generally far less in regional areas than it is in metro Australia. Telstra has advised that they plan significant investment in the forward years to increase the mobile coverage in regional areas. Any change in policy must carefully consider the need for continued investment into regional infrastructure.

Perhaps, a percentage of the financial contributions that Telstra receive from other providers for the use of their



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infrastructure under any 'roaming regulation' could, through policy provisions, be directed towards increasing regional infrastructure. If this can be achieved then this would be viewed as a 'win/win' situation by achieving increased competition and increased coverage.

We urge you to consider this matter carefully to ensure that incentive for regional investments in infrastructure is increased and not diminished through any future policy change.

Yours faithfully

Robyn Hendry
Chief Executive Officer
Canberra Business Chamber

Cr Rowena Abbey
Chair
Canberra Region Joint Organisation