



Mr Rod Sims
Chairman
Australian Competition and Consumer Commission
Via: mobileroamingenquiry@accc.gov.au

1 June 2017

Dear Mr Sims,

Domestic Mobile Roaming Declaration Inquiry 2016

WAFarmers thanks the ACCC for their inquiry into domestic mobile roaming, and welcomes the decision within the draft decision released on 5 May 2017. The decision has eased any angst within the agricultural and rural communities that may have existed due to the potential loss of connectivity, should domestic roaming have been regulated.

WAFarmers believes in and advocates for market competition, as this encourages lower prices for the consumer. However, this particular issue posed uncertainty over future investment in infrastructure which is essential to both the social and commercial aspect of living in regional Australia. WAFarmers recognises that increasing affordability to the consumer through roaming does not increase reliability of service, nor does it encourage expansion of network coverage.

Our membership, in conjunction with the rest of the rural and regional community, has been vocal with their call for improved network access and reliability. Domestic roaming was identified as a threat to future investment rather than a cause for increased expansion of coverage. Given the evidence and explanations in the ACCC's draft decision, WAFarmers reaffirms these findings. The risk domestic roaming poses to families and businesses operating in rural and regional areas is simply too high.

The introduction of domestic roaming was reportedly going to cost Telstra approximately \$540 million. This has a direct impact on rural and regional telecommunications infrastructure, but also casts doubt over mobile black spot programs which play an essential role in enhancing the connectivity of country-based customers. Domestic roaming is a threat to the productivity and livability to all regional and rural Australians.

Furthermore, Telstra has committed through the media to increase the footprint of its 4G network, which will be of great benefit to the agricultural community. As farmers are increasing their uptake of ag-tech, the provision of improved telecommunications will allow for machinery and IT systems to transfer data in a shorter timeframe. This will result in significant improvements to the operations of a primary production enterprise and enhanced productivity opportunities.

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WAFarmers believes it is important to note that there is no current legislative or regulative framework prohibiting other companies from investing in regional towers, or co-locating their infrastructure on another company's towers. Optus has begun making a considerable investment in regional Australia via the Black Spot Program and is beginning to compete with Telstra for coverage. VHA makes a minimal investment in regional and rural Australia and is encouraged to invest its own capital in an effort to expand its network coverage.

Increasing reliability and access of the rural network was central to our original submission, and part of this, we encouraged the ACCC to explore a regulatory setting that would foster growth without the introduction of roaming. ACCC's proposal of towers that attract government funding should have open access is a framework WAFarmers supports. We believe this is something that should be implemented and trialed over future stages of the Federal Government's Black Spot Program. Open access could be the catalyst for telecommunication companies to roll out their network infrastructure at an increased rate, providing consumers with improved network access in a shorter lead-time.

WAFarmers appreciates the ACCC's position on the proposal of domestic wholesale roaming within Australia. The stance taken by the ACCC is a measure that protects future infrastructure development throughout the regions which is essential to businesses and residents of the rural community. WAFarmers encourages all telecommunication companies to invest in regional areas of Australia, as access and reliability of telecommunication and data services is crucial to the livability and productivity for those in the bush.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Tony York', with a stylized flourish at the end.

Mr Tony York
President
WAFarmers