



Grahame O'Leary
Director
Communications Group
Australian Competition and
Consumer Commission
Grahame.oleary@accc.gov.au

Dear Grahame

RE: Audit of Telecommunications Infrastructure Assets – Record Keeping Rules

The National Farmers' Federation (NFF) welcomes the Australian Competition and Consumer Commission's (ACCC) discussion paper Measures to address regional mobile issues and express support for ACCC's proposal to update and amend the Audit of Telecommunications Infrastructure Assets – Record Keeping Rules 2013 (Infrastructure RKR).

As the peak body for agricultural producers and a founding member of the Rural Regional and Remote Communications Coalition (RRRCC), the NFF and the RRRCC are continually working towards achieving greater transparency and promoting education for our members as regional, remote and rural consumers of telecommunications services.

The ACCC's Mobile Roaming Service Inquiry repeatedly emphasises that consumers in rural, regional and remote areas have a high rate of reliance on mobile and internet services, however connectivity is well below what is demanded by farm and regional businesses.

Connectivity is at the heart of productivity growth for farm businesses and regional communities, and there is enormous latent demand for data in rural and regional Australia, including on farms. Regional consumers are anxious to overcome the digital divide that they feel currently exists between rural and urban Australia. However, before these consumers can consider investing in new technologies that will drive data consumption and farm productivity, there is a need to overcome the capacity constraints and frustrations that form the existing narrative of rural telecommunications.

We note the ACCC's proposed action of approaching industry directly to develop more transparent and consistent information about networks and services as well as metrics to ascertain tower performance. We are very supportive of this measure and look forward to timely progress by mobile network operators (MNO). The NFF also extends an offer of assistance to ACCC to pursue outcomes.

One of the great frustrations for NFF's members is the lack of accountability currently in place to track network investment announcements in regional Australia. Investment announcements are eagerly anticipated and welcomed by the NFF and RRRCC's membership base. However, the

level of detail provided by each MNO regarding investment location, infrastructure roll out and community engagement is inconsistent and could even be deemed minimal.

Further, marketing claims regarding the percentage of the population that will be covered by each MNO are a constant source of frustration to regional and rural consumers, who are typically in the 1-2 percent that fall outside of the network coverage. It is often acknowledged with disappointment that the levels of coverage and reliability are excessively hard to ascertain between each MNO.

We would also like to bring to the ACCC's awareness, the positive implications greater transparency and consistency in coverage mapping can have on regional consumers beyond the perceived "traditional" mobile device uses and current service levels. An increase in coverage mapping has the potential to assist regional consumers in future investment decisions – both on farm and within ancillary industries and, also enable these consumers to prepare their business models for the application of new technologies– a consideration that will gain increased importance as the 5G network is rolled-out in coming years.

To this end, it is also important to consider how greater transparency about future coverage can potentially also inform future investment decisions – both on farm and within ancillary industries. This is illustrated in the recent report *Accelerating Precision Agriculture to Decision Agriculture* (Lamb, 2017) which found:

“There is no single database of national mobile coverage (all network operators) available for analysis of farm coverage across Australia. Mobile coverage data, as opposed to publically-available data on tower locations, is generated by MNOs using proprietary assumptions, and available in such a form as to preclude rendering of digital data layers for further analysis.”

“Such knowledge would provide a wealth of information for strategic planning around farm communications, not necessarily just to inform strategic expansion of mobile coverage as part of, say, the MBSP, but also to inform the market place seeking to develop and offer innovative (and compatible) network solutions for farmers to expand data coverage on their farms.”

For this reason, the NFF supports strengthening Infrastructure RKR to increase accountability and information sharing around forward investment commitments. We also encourage widespread accountability and recommend that all telecommunications infrastructure providers including utility providers should be subject to the Infrastructure RKR.

We would be pleased to meet to discuss this issue further. Please contact me on 02 6269 5600 or at mharveysutton@nff.org.au to arrange a time.

Yours Sincerely



MARK HARVEY-SUTTON
Manager, Rural Affairs