

NORTHERN TERRITORY

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8 December 2017

Australian Competition and Consumer Commission Communications Sector Market Study commsmarketstudy@accc.gov.au

Dear Sir/Madam

Re: Draft Communications Sector Market Study

Please find attached our comments (Attachments A and B) on the ACCC's draft *Communications Sector Market Study*.

RDA NT is an incorporated not-for-profit community-based organisation that is concerned with building partnerships and ensuring that all governments and stakeholders collaborate in developing and strengthening regional communities. RDA NT is part of a nationwide network of 55 RDA Committees with membership comprising local individuals who have a good understanding of the economic, environmental and social issues and priorities in their respective regions. RDA NT has identified telecommunications as the backbone underpinning the NT's economic and social development.

Given the critical role that telecommunications plays in our region, RDA NT has been active in this space since 2014. We have been a member of the Broadband for the Bush Alliance (including Board membership) and supported the annual B4B Forum. We have also had input into the 2015 Regional Telecommunications Review, the Productivity Commission's Review of the TUSO and the Australian Government's Telecommunications Reform Package. We have also completed two significant telecommunications projects, the Digital Workplace Assessment Tool (DWAT) and the High Speed Wireless Technology Pilot.

Whilst we welcome some of the proposed recommendations and actions, we are nevertheless disappointed that the study does not contain more recommendations and actions to address the market failure exhibited in many parts of regional, remote and very remote Australia, including in the NT. Consumers in these areas face a number of challenges in overcoming the digital divide (e.g. access, affordability and reliability) and we believe the current draft could have gone further in suggesting policies and actions to address these challenges. The study should consider the communications market through a geographic lens, recognising that telecommunications consumers are not a single homogenous group with common communications service standards and needs. Comments on specific elements of the draft report are provided at Attachment A.

Smaller communications providers also face barriers to entry in the market in regional and remote areas and our experiences in this regard are provided separately at **Attachment B**, on a **Commercial-in-Confidence basis and are not for publication**.

If you have any further queries please do not hesitate to contact Project Officer Robin Gregory on 0417 781 272 or by email alice@rdant.com.au.

Yours sincerely

Kate Peake

Chief Executive Officer



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