

29 July 2016

Australian Competition and Consumer Commission  
Via email: [Claire.preston@accc.gov.au](mailto:Claire.preston@accc.gov.au)

### **Re: Wholesale ADSL service declaration inquiry**

The National Farmers Federation (NFF) welcomes the opportunity to make a submission to the ACCC's *Wholesale ADSL service declaration inquiry*. A declared wholesale ADSL service is at present crucial to Australians living outside of urban centres to ensure competition between telecommunication providers and to offer Australians living in rural and regional areas a choice of internet provider. The NFF is supportive of continuing to have the wholesale ADSL service declared by the ACCC until other reliable, affordable and adequate internet options are offered across all of Australia.

The NFF is the peak national body representing farmers and, more broadly, agriculture across Australia. The NFF's membership comprises of all Australia's major agricultural commodities. Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations collectively form the NFF.

Rural and regional Australians traditionally have insufficient competition of telecommunication providers as there is very limited commercial incentive to install competing telecommunications infrastructure such as copper and fibre networks outside of metropolitan areas. Telecommunications infrastructure in rural and remote areas is therefore almost always a natural monopoly. The wholesale ADSL service is predicted to be replaced by another natural monopoly – the NBN – in the near future. The NBN will provide universal broadband network infrastructure across all of Australia. However, the NBN is not yet fully rolled out, making the declaration of the wholesale ADSL service a necessity for the coming years.

For further information please contact:

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