

25 October 2016

Australian Competition and Consumer Commission  
Via email: Nicole.Ross@accc.gov.au

**Re: Superfast Broadband Access Service and Local Bitstream Access Service Final Access Determination Joint Inquiry**

The National Farmers Federation (NFF) welcomes the opportunity to make a submission to the ACCC's *Superfast Broadband Access Service and Local Bitstream Access Service Final Access Determination Joint Inquiry*. Access to reliable, affordable and sufficient telecommunication services is essential to Australians living outside of urban centres. Key to achieving this goal is to ensure competition between telecommunication providers and to offer Australians living in rural and regional areas a choice of internet provider.

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, necessitating a declaration under the *Competition and Consumer Act 2010* (CCA).

The *Discussion Paper* highlights that current SBAS and LBAS regulated prices differ according to geographical zones. The NFF is aware that it is more costly to deliver telecommunication services to customers living in rural and remote locations. However, we would like to highlight that the divide in end-user access charge and end-user download limits between Australians living in rural and remote locations compared to Australians living in the capital cities should not extend any further.

For further information please contact:



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