

The Australian Competition & Consumer Commission
Level 35, The Tower
360 Elizabeth Street
Melbourne Central
Melbourne Vic 3000

Thursday 24th December 2016

Submission re: Domestic Roaming

I write in response to your inquiry on behalf of TRFM, which is part of the ACE Radio network, a regionally based business that operates a large mobile workforce.

We are really concerned about the impact domestic roaming will have on mobile investment in regional areas.

Mobile technology is extremely important for our business as our teams travel all over regional Victoria. Our business also utilises the 4GX Mobile Network to broadcast radio shows from hundreds of Regional Victorian businesses promoting the importance of keeping retail dollars in regional communities.

Our large modern sales force upload all advertising bookings whilst out on the road, present marketing opportunities to clients in their business and provide emerging digital marketing solutions to regional SMEs, all over the 4GX network.

Most importantly as an official emergency services broadcaster we have an obligation to provide the most up to date and relevant emergency information possible, the 4GX network assists with these endeavours.

Access to high speed mobile data has become increasingly important for our business as we require the ability to stream our radio shows seamlessly and upload large data files.

Domestic Roaming will discourage investment in expanding future technology and improvements and not provide any additional coverage across regional areas.

In your inquiry on mobile roaming it is important that any incentive for mobile phone carriers to invest in new mobile technology is not discouraged.



Grant Johnstone
General Manager
Gippsland's 1242 & TRFM
ACE Radio Broadcasters Pty Ltd