



17 November 2016

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**Australian Competition and Consumer Commission
Domestic Mobile Roaming Declaration Inquiry 2016**

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Submission to Domestic Mobile Roaming Declaration Inquiry 2016

Whilst the potential to increase the availability of alternate mobile phone service providers in regional and rural areas, by enabling domestic roaming, may enable competition between service providers there is no certainty that it would improve service quality, increase mobile service coverage or decrease usage costs to consumers.

The perceived equity and fairer competition in being able to choose from multiple service providers is a moot point when there is in fact, no service that is provided.

In rural and regional areas, particularly remote areas and in the 'high country', lack of mobile coverage from the existing infrastructure and lack of ongoing and sufficient investment into new infrastructure is a continuing and significant problem. Whilst technology is improving how the existing infrastructure is used, there still must be new infrastructure on the ground, covering greater distances to provide increased coverage.

It would appear that enabling providers to use existing mobile phone towers, would in fact, significantly decrease and discourage further investment in new network infrastructure development, thereby stalling any expansion in coverage.

As mobile service coverage is perhaps the most significant telecommunications issue within our Shire, we would not support and indeed, strongly discourage the adoption of a domestic mobile roaming declaration.

Instead we propose that the ACCC and the telecommunications industry look at realistic and achievable methods to encourage and support future mobile service infrastructure investment and delivery to improve and provide mobile service coverage in rural and remote areas to ensure equity for all Australians.

Yours sincerely,

**Helen Anstis
Chief Executive Officer**