Broadband for the Bush Alliance response to ACCC Mobile Roaming Declaration Inquiry Draft decision

15 June 2017

About Broadband for the Bush Alliance (B4BA)

Established in 2012, the Broadband for the Bush Alliance (B4BA) is a national membership-based organisation dedicated to advancing the digital capacity and capability of those who live and work in remote Australia. The Alliance brings together a range of stakeholders with expertise in communications, remote service delivery, and community engagement.

As part of its activities, the Alliance organises an annual forum which provide an opportunity for people from rural and remote areas to come together to hear the latest technology and policy developments, discuss the issues, research and practical solutions to the telecommunications issues faced by those living and working in the bush. The ACCC will address forum delegates at the 6th Broadband for the Bush Forum, *Remote, Connected and Savvy*, on 22-23 June 2017 in Fremantle. This will provide an opportunity for many remote stakeholders to discuss the ACCC draft decision.

Response to ACCC draft decision

B4BA supports the ACCC's draft decision released on 5 May, proposing not to declare a domestic mobile roaming service. B4BA agrees with the ACCC's findings that:

- "There is reasonably effective competition in the national mobile services market. Service providers compete on a broad range of product features such as price, geographic coverage, service quality, network technology, inclusions and content. The difference in geographic coverage is contributing to competition.

- In some regional, rural and remote areas of Australia, choice of mobile service provider is not available or is more limited. However, these consumers still benefit to

some extent from competition outside of these areas due to national uniform pricing.

- There is insufficient evidence that, given the current state of competition, declaration of a mobile roaming service is likely to promote overall competition to a significant extent.

- There is evidence that mobile network operators are continuing to make efficient investments to compete on regional coverage. Declaration of a mobile roaming service in these circumstances may distort efficient investment incentives."

Additional comments:

B4BA believes mobile telecommunications remain a key issue for rural and remote Australians. Providing reliable and affordable mobile telecommunications is critical for improving social and economic development outcomes in remote areas, including Indigenous communities. Additionally, access to broadband through mobile devices has become the medium of choice for all Australians, particularly in remote areas where people are regularly travelling or working outdoors.

Whilst domestic mobile roaming is viable in large population area where commercial markets exist, it will not work in remote Australia where markets are limited due to small and dispersed populations over huge landmass (Remote Australia covers 85% of the Australian landmass but only 3% of the population live there).

B4BA believes a move to introduce mobile roaming in remote Australia carries significant risk of reducing the likelihood of further telco investment in infrastructure as well as affordability and reliability of mobile services. For these reasons, IRCA supports the ACCC's draft decision to not declare a domestic mobile roaming service. There is a need to continue the Mobile Black Spots Program investment and co-investment arrangements to expand mobile services. A move to mobile roaming would reduce the current incentives for Telcos to co-invest in infrastructure.

More broadly, B4BA believes that there is a need for a bespoke Remote Telecommunications Strategy to address and meet the telecommunication needs of rural and remote Australia. Indeed, improving availability and affordability of services, setting minimum service standards and guarantees, advancing digital literacy and empowerment remain key priorities to bridge the digital divide between the bush and metropolitan areas. The 2016 B4BA forum participants called for a coordinated RTS and articulated a set of recommendations which can be accessed at: http://broadbandforthebush.com.au/wp-content/uploads/2015/12/BroadbandForTheBush_Forum2016_Communique-Published-1.pdf