23 November 2016

Australian Competition and Consumer Commission
GPO Box 3648
SYDNEY NSW 2001

mobileroaminginquiry@accc.gov.au

Dear Sir / Madam

**ACCC mobile roaming inquiry**

I write in response to your current inquiry into mobile roaming on behalf of the regional stakeholder Broken Hill City Council. Mobile telecommunications are critical to the social and economic prosperity of rural and regional Australia. The most critical telecommunications issue for individuals, farms, businesses and communities is mobile coverage. We not only need greater coverage, but we need better coverage.

Coverage is the most important issue for regional mobile customers, and where coverage exists it’s important that mobile companies invest in the latest mobile technology. It is my view that the best way to deliver greater choice is to encourage mobile companies to invest in their own network infrastructure in regional areas.

Regulated roaming could increase retail mobile prices overall as other carriers seek to recoup the additional costs of providing services over Telstra’s regional network. Regional customers already benefit from intense competition between mobile network operators because nationally, prices are falling and data inclusions are rising.

We know how important the latest technology is to rural communities. It is therefore vital that the current strong competitive incentives to continue investing are preserved. Regulated roaming would diminish incentives to keep investing in our Broken Hill network, jeopardising future upgrades in coverage or technology without delivering additional coverage. One does not appreciate the value of telecommunication infrastructure investment until you live, visit or invest in areas such as Broken Hill.

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The Broken Hill area is currently experiencing a mini resurgence in the mining sector in both traditional mining and renewable energies such as solar, cobalt (lithium) and wind farming and over the next three years we would anticipate upwards of 1500 jobs to be directly created through these initiatives.

Your deliberations on mobile roaming is critical in ensuring that the incentive for telecommunication organisations to invest in mobile infrastructure be maintained. If this incentive is diminished or destroyed, it would be a disaster for rural and regional Australia and Broken Hill in particular.

Yours faithfully

JAMES RONCON
GENERAL MANAGER