25 November 2016

To Whom It May Concern,

Submission to the ACCC domestic mobile roaming declaration enquiry

As Mayor of Burke Shire Council, I appreciate the opportunity to make a submission to the ACCC domestic mobile roaming declaration enquiry.

Burke Shire spans more than 40,000 square kilometres in the Gulf of Carpentaria in far north Queensland, with a resident base of around 500 people spread between vast beef cattle stations and two remote rural towns. The local government area is vulnerable to tropical cyclones, and experiences annual flooding that isolates its towns and stations during the wet season. Communication technology is crucial to community resilience in this rural remote context. Improved communication has an exponential positive impact on health, education and economic outcomes. Internet and mobile services underpin effective disaster management, business development and tourism – the latter presenting a pivotal opportunity for economic development in an location rich with natural attractions, early settler history, Indigenous cultural heritage, and World Heritage listed fossil fields that are amongst the most extensive in the world.

Burke Shire Council has actively sought to partner with providers to improve access to communication technology that will increase resilience for its communities. Council has been willing to invest its own scant resources to prove its commitment. Providers however – with one exception – have declined to invest in infrastructure that does not return a commercial benefit due to the remote location and low population base. In the current competitive and unregulated mobile roaming environment, Telstra has been the exception.

Through partnerships with Telstra, Burke Shire Council has been able to deliver high-speed broadband, 4g mobile and public Wi-Fi capabilities to Burketown via a project to lay around one hundred kilometres of optic fibre between the remote towns of Doomadgee and Burketown. This partnership will also deliver mobile services to the township of Gregory courtesy of Round 1 of the Mobile Blackspot program. Telstra is now working closely with Burke, with support from the Local Government Association of QLD, to deliver optic fibre between Burketown and Normanton. Investment in this infrastructure will close a loop and increase resilience to two-thirds of the population of Queensland. These projects represent new investment in core telecommunications infrastructure delivering up-to-date mobile and Wi-Fi capabilities for government service providers, businesses, residents and those who travel through the Burke Shire – now and into the future.

The current competitive mobile services environment has enabled a dramatic increase in community resilience in our local government area through the installation of contemporary information technology infrastructure. Telstra is the only provider who has been willing to make this investment. We do not support the introduction of regulated mobile roaming services at this time, as this is not likely to encourage Telstra’s competitors to invest; and indeed may make
Telstra reluctant to invest in further infrastructure in remote areas only to have their competitors gain a commercial advantage at Telstra’s expense. Our community has achieved critically important connectivity within the current unregulated environment.

The Burke Shire believes in investments that expand and improve mobile coverage in remote and regional Australia; and not in regulatory changes that have the potential to threaten successful co-investment opportunities that will deliver expanded coverage and improved services to those who most need them. In heading down a path toward regulated roaming, the ACCC has the potential to facilitate the demise of such investments and to exacerbate the digital divide between city and country. Along with disallowing roaming, it is imperative the Universal Service Obligation (USO) remains enshrined in policy particularly for those who reside in regional and rural Australia.

It is vital to protect providers who are willing to make the investment, now and into the future, in telecommunications infrastructure in order to redress the growing economic and social disparity between urban and regional Australia. Regulated roaming neither protects the substantial investment required by any service provider willing to narrow the digital divide, nor ‘closes the gap’ for those in need of reliable, modern telecommunication services.

I trust that the voice of rural remote Australia will be given weight in this consultation process; and hope that the ACCC Roaming Enquiry will determine that the only appropriate approach to regulated roaming is to quash it.

Yours sincerely,

Cr Ernie Camp
Mayor