



Country Women's Association of NSW

*Incorporated in 1931 by an Act of NSW Parliament
Constituent Society of the Associated Country Women of the World*

ABN 82 318 909 926

25 November 2016

Australian Competition and Consumer Commission
Sent via email: mobileroaminginquiry@accc.gov.au

To whom it may concern:

RE: Domestic Mobile Roaming Declaration Inquiry 2016

The Country Women's Association ("CWA") is the largest women's organisation in Australia. The CWA of NSW was formed out of desperate need back in 1922. Country women were fighting isolation and an appalling lack of health facilities and the constraints of a male-dominated society. These women realised they had nowhere else to turn but themselves — and the result was staggering. Within a year the Association was a unified, resourceful group that was going from strength to strength. The CWA remains an Australian institution and a strong voice for women across the country.

CWA members come from all walks of life. They live in the city and the country. They were born in Australia or have chosen Australia to be their home. And they share a commitment to improving the lives of women and their families by lobbying Government on key agenda issues, fundraising and teaching life skills.

As part of the largest women's organisation in Australia, our key aims are to provide a forum for the voice of women in NSW and improve the conditions and welfare of all women and families, especially in regional and rural areas.

We also support initiatives that enhance the value of 'country living' — especially in the areas of health and education; as well as strongly encourage development in regional areas and increase the viability of rural communities;

When considering our background and key aims, it becomes obvious why the CWA of NSW would provide some brief comment to the Australian Competition and Consumer Commission's ("ACCC") inquiry into domestic mobile roaming. The recommendations and outcomes from this inquiry will have far-reaching impacts on our members and the communities that they live in. We feel that their concerns should be a high priority when considering the issue at hand. From the outset, we wish to highlight the importance of ongoing support and investment into regional communities by both government and private entities. Any decisions that disincentive investment in rural telecommunications infrastructure will not be supported by the CWA of NSW.

The digital age is well and truly upon us, but unfortunately, many of our country communities are not seeing the benefits. A lack of connectivity, particularly mobile coverage, results in barriers to growth for our farmers and small business operators as

well as barriers to a quality education for our students; and barriers to health services for our entire community.

While 78% of NSW regional residents love living in their community, they cite critical infrastructure, including telecommunications, as being underserved. When asked about mobile phone coverage, 52% felt they had good coverage, while 31% felt that their local coverage was poor. People living in New South Wales and in Queensland reported poorer access compared to those living in other states. ¹ Improved mobile coverage can support the development of traditional business as well as e-commerce business that may choose to be located in rural areas. ²

As we understand it, current regulation prevents domestic mobile roaming, which would enable a suite of mobile service providers to provide coverage for their customers in areas where they haven't necessarily invested in their own network infrastructure. Those in favour of this approach argue that this would provide more choice to mobile customers in areas that already have mobile coverage. Whilst we feel that competition in the marketplace is important, access to adequate, reliable and affordable mobile coverage is critical and is a higher priority for the CWA of NSW.

We are concerned that an introduction of wholesale mobile roaming could lead to a market environment that does not provide incentives for further investment into the rural areas of Australia. Whilst the CWA of NSW does not have specific policy on the roaming issue particularly, we do have a long standing position on the importance of investment and support for regional communities more broadly.

When considering this issue, we urge the ACCC to fully investigate the risk issue we have identified in relation to the potential negative impacts on future investment for mobile infrastructure in the regions. We ask that the ACCC look towards finding a solution that balances this risk against the aim of better mobile coverage in regional Australia.

Thank you for the opportunity to comment.



Danica Leys
Chief Executive Officer

¹ Regional Wellbeing Survey Results 2015: https://www.canberra.edu.au/research/faculty-research-centres/ceaph/regional-wellbeing/survey-results/2015/RWS2015_Web-Part-2.pdf

² Rao Hill *et al.*, 2011. Understanding broadband adoption in rural Australia. *Industrial Management & Data Systems*, 111(7), 1087-1104