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18<sup>th</sup> November 2016

To: ACCC Mobile Roaming Inquiry  
(mobileroaminginquiry@accc.gov.au)

**Submission to  
ACCC Domestic Mobile Roaming Declaration Inquiry**

**My Background:**

I make this representation based on my current roles within a number of rural and regionally based community organisations:

- Chairman, School & Beyond – Chaffey Learning Exchange project (\$1.1 million Federal Murray Darling Basin funded education empowerment)
- Vice President, Rural Media South Australia
- Past President, Rotary Club of Mobilong
- SA delegate to the Australian Council of Agricultural Journalists
- Member, Murray Bridge Hills MTB Trails Steering Committee for Kinchina Conservation Park
- Member, University of Adelaide Alumni Council  
(Representing the two agricultural Campuses at Roseworthy and Waite)

My professional background is as an agriculturally qualified consultant, permanently based in the regional areas of South Australia for a continuous period of 40 years, delivering services to rural and regional communities on behalf of the SA Government's agricultural agency.

The primary focus of my professional role was engagement of communities, capacity development, technology transfer and communications.

**Submission:**

It has been brought to my attention that the ACCC is enquiring into the feasibility of regulating mobile phone roaming. As part of the Inquiry, the ACCC is open to the receipt of opinions, views and professional statements from a range of stakeholders.

My primary mobile telecommunications experience is as a long term customer and user of services provided by Telstra.

My personal and professional opinion of regulation of mobile roaming is that it would significantly disadvantage the people and businesses operating in rural and regional areas.

While current mobile coverage claims are that 90%+ of the nation's population is serviced, this does not take into account the peculiarities of the sector that makes the largest contribution to the national economy – farming and rural endeavour. In the areas supporting this sector (rural & regional), there are extensive areas that experience nil or inadequate mobile services.

Over time, it is hoped the business case for companies such as Telstra to invest in technologies and infrastructure that extend the mobile service coverage further into these areas will be apparent.

I must say that the issue is not based on choice of mobile service provider. Irrespective of whether the chosen provider of mobile services is Optus, Vodafone or Telstra, the primary issue is that there is absolutely no service infrastructure in many areas for these operators to use.

*“Regulated Roaming”* will simply result in a greater number of service provider companies operating within the currently limited physical service area, without any incentive to further invest in expanding the area.

This is based on a reduction in the profitability of expanding the physical footprint of mobile phone services. In other words, the business case for directing increased investment into regional and rural areas would not support a case for increasing the mobile footprint.

As a resident of the South Australian regional town of Murray Bridge, I can attest that mobile phone services cut-out less than 20 kilometres out of town on the major Riverland/Melbourne highway. This is irrespective of choice of mobile carrier company.

*“Regulated Roaming”* would not improve this situation.

It would be to the significant advantage of regional communities for the various mobile service carrier companies to gain a commercial advantage over their rivals through the expansion of their service areas, rather than having multiple carriers piggybacking on the same limited-area network.

Provision of competitive advantage and the potential flow-on of increased profitability are the only business case that would result in the level of increased investment needed to expand the physical area serviced by mobile coverage.

*“Regulated Roaming”* would be detrimental to regional communities, the national economy and further investment.

I would be pleased to discuss this with you in further detail if desired.

Yours sincerely,



**Dale Manson J.P.**

MAppSc(Ag), Grad Dip Ed, Dip Ag, Dip Ag Tech, Cert IV Assess. & Train.