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Ref No: 19.89.1/2

Australian Competition & Consumer Commission  
Mobile Roaming Inquiry  
GPO Box 3131  
CANBERRA ACT 2601

To whom it may concern

**RE: Mobile Roaming Regulation**

Council is aware that The Australian Competition and Consumer Commission (ACCC) has released a discussion paper as part of its enquiry into whether to declare a wholesale domestic mobile roaming service.

The District Council of Elliston therefore submits the attached response to the discussion paper.

Yours sincerely

Phil Cameron  
**Chief Executive Officer**



## **Domestic Mobile Roaming Submission**

The District Council of Elliston is a very remote Council situated on the west coast of Eyre Peninsula in South Australia and contains the main township areas of Elliston, Lock, Venus Bay and Port Kenny.

The following information is submitted as a case study in response to the ACCC inquiry into whether to declare a whole sale domestic mobile roaming service.

### Background

Elliston is a small coastal town in South Australia on the west coast of Eyre Peninsula, 169 km northwest of Port Lincoln and 641 km west of Adelaide. It is classed as “very remote.” The town infrastructure spreads along the northern and south eastern shores of Waterloo Bay, providing housing with a coastal ambience and quality sea views. The area was settled in the 1840s with Elliston being the central port from which the early settlers transported their wool and wheat to market. At the 2011 census Elliston had a population of 291 people with the Elliston LGA having 1068. The ABS Socio-Economic Indexes for Areas (SEIFA) has placed the District Council of Elliston in the lowest 50% to 60% of South Australian LGAs and scores below the Australian mean on three of the four socio economic indices.

Elliston township and the surrounding Local Government Area’s internet and mobile phone services are at the limit of their capacity. There is insufficient bandwidth to meet the current telecommunications needs for the Internet, mobile phone services and Wi-Fi. There is also no telecommunications infrastructure in place to enable expansion of the bandwidth to meet the existing and future needs of business, State and Federal government services, Local Government, local residents and the emerging tourism trade.

Elliston has the potential to expand its economic and productive horizons. There is potential to attract drive in/drive out employees and their families to the area, particularly to the township of Elliston through mining and oil & gas exploration and an expanding tourism industry. Elliston has some significant potential opportunities for economic and employment expansion that can only be realized with substantial increases in its communication capability.

There is a requirement for an effective communications infrastructure for Elliston, including the upgrade of all mobile towers in the area.

### Comments and concerns

Council is of the opinion that the current regulatory settings deliver efficient competition as they ensure an absolute level playing field for mobile operators to invest in their own competing regional and mobile networks. Regulation ensures that any operator can access the backhaul that connects a mobile tower on terms and prices set by the competition regulator.

Regulated roaming would add complexity, increase costs for providers and then potentially prices for consumers, and undermine the competitive dynamic in the market. This will remove the incentive for any network operator to add to its current coverage in regional Australia. The roaming regulation could jeopardize any future upgrade of mobile phone services within the Elliston area and stifle economic development including expanding the tourism industry and creating jobs.

In other countries regulators are now moving away from roaming to encourage investment.

Regulation has always mandated access to towers for colocation and to existing backhaul links.