Submission to the ACCC Domestic Mobile Roaming Declaration Enquiry

As residents of remote Australia and individuals desirous of further investment and increased availability of telecommunications technology we appreciate the opportunity to make a submission to the ACCC domestic mobile roaming declaration enquiry.

Remote Australia, the area in which we live, lags behind its urban and “closer in” cousins due to the impact of the tyranny of distance on our everyday activities be they business, educational and/or personal. Increasing the quantum of investment in telecommunication infrastructure and service provision offers very real opportunities to improve health and safety in remote areas as well as correct the widening disparity and allow remote residents to take advantage of the myriad of opportunities being part of the global village offers.

We are part of a strong agricultural industry keen to diversify and enhance efficiencies. The North Australia White paper clearly highlights the potential of remote Australia to contribute to the economic strengthening of the nation. Our children were all educated via School of the Air which relies on technology to deliver daily phone lessons as well as core components of the curriculum. We rely on telephone to access health care via the Royal Flying Doctor network and provide health and safety for ourselves and our staff. As well, in our Shire, there are burgeoning interests in mineral resources, alternative energy and indigenous business development. All would benefit from the technological opportunities afforded by ongoing investment in telecommunications - underpinning the long term sustainability of our region and its contribution to Australia.

The current competitive mobile services environment has enabled a dramatic increase in community resilience in our region through the installation of contemporary information technology infrastructure. Telstra is the only provider who has been willing to make this investment. Our closest town, Burketown, now has high speed broadband, public wi-fi and 4G technology capabilities through a fibre optic project brought about by local government partnering with Telstra. Additionally, mobile services to another small town in our Shire, courtesy of Round 1 of the Mobile Blackspot program, is being rolled out in partnership with Telstra. Telstra is now working closely with our Local Government entity- Burke Shire Council- 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 Southern Gulf- now and into the future.

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 region has achieved critically important connectivity within the current unregulated environment.

We firmly believe in, and would welcome, investments that expand and improve mobile coverage in remote and regional Australia, 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 to allow regulated roaming, the ACCC has the potential to facilitate the demise of such investments and to exacerbate the digital divide between city and country.

An assertion has been made by certain stakeholders that a removal of the Universal Service Obligation (USO) would free up funds to increase investment in mobile infrastructure. While this could be possible, given the challenges with making a commercial profit in remote areas, due to a
lack of population density and the vast distances necessitating coverage, it would be unlikely that such infrastructure would be placed in regional or remote Australia and that there would still be large gaps in coverage. Regional and remote Australia would lose its guaranteed minimum service standards and potentially see service decline with no mobile and an unreliable fixed line service. 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 essential to protect providers willing to make 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.

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

Yours faithfully

Ernie and Kylie Camp
Graziers