11 November 2016

The Chairman
Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601
CANBERRA ACT 2600

Via Email

Dear Sir,

RE: DOMESTIC MOBILE ROAMING DECLARATION INQUIRY

Griffith City Council is delighted to be able to offer on behalf of our community input into this Inquiry and we commend the ACCC for conducting another review, as this is important to ensuring our consumers & businesses receive the best price, service and outcomes.

Griffith City is the capital of the Western Riverina and services a population catchment of 52,016 (ABS, 2011). As the major food bowl of Australia, the region is:

- Supplying 75% of NSW wine grapes which is equivalent to one in four glasses of wine
- Producing 70% of NSW citrus
- Producing 90% of Australia's rice which feeds tens of millions of people each day
- Growing 95% of Australia's prunes
- Home to Australia's largest chicken meat processor, with 2.8M chickens processed weekly with continued expansion developing

So as can be seen by the above, communications and in particular "mobile communication" is now an essential commodity and is vital not only for our private use but absolutely essential in today's modern business climate. We also know that more and more Australians are using there smart phone or tablet to conduct business.

As we understand the current situation, there is nothing preventing Optus or Vodafone from putting their equipment on any Telstra mobile tower, anywhere in Australia, where technically feasible. This is mandated by the Telecommunications Act.
We also contend that the current level of regulation encourages competition and this provides for lower mobile phone plans, as the Telco’s all set National Plans largely buying for the lucrative metropolitan customers and this is essential for those of us who live in regional Australia.

Whilst phone costs are an important factor it is our contention that the lack of mobile coverage is the key for all of us who reside in the country and that regulating mobile roaming will not be helpful to fixing this urgent and long overdue enabling piece of infrastructure.

In fact we believe that regulating mobile roaming will effectively drive up costs to the consumer due to the complexity and increasing costs to the Telco’s and they will in turn pass on these costs to the consumer. It could also mean that the Telco’s themselves do not invest as heavily in hardware as is the current situation. Stifling further advancements and exacerbate the mobile black spot situation. As well as hindering future growth opportunities in strong centres like Griffith.

Once again we appreciate the opportunity to be able to put forward our thoughts on this extremely important and vital asset.

Yours sincerely,

BRETT STONESTREET
GENERAL MANAGER