Submission to the ACCC Domestic Mobile Roaming Declaration Enquiry

Gulf Savannah Development (GSD) appreciates the opportunity to make a submission to the ACCC domestic mobile roaming declaration enquiry.

Gulf Savannah Development is the facilitating organisation for the Gulf Savannah Region to drive economic development projects and initiatives for the benefit of its stakeholders. It is a central representative body to engage with external entities to drive the growth of the Gulf Savannah Region. GSD brings together people, ideas and resources to drive economic development and growth in the Gulf Savannah Region. Its current focus is on developing a strategic plan for the region, supporting and growing tourism and providing specific services to Gulf Savannah residents and businesses.

The local government areas represented by GSD are vulnerable to seasonal extreme weather events – flooding, cyclones, bushfires, drought and communication technology is crucial to community resilience in this rural remote context. Improved communication has an exponential positive impact on health, education and economic outcomes as well as boosting social inclusivity. Internet and mobile services underpin effective disaster management, business development and tourism – the latter presenting a pivotal opportunity for economic development in a location rich with natural attractions, early settler history, Indigenous cultural heritage, World Heritage listed fossil fields that are amongst the most extensive in the world. A strong agricultural industry keen to diversify and enhance efficiencies as well as developing interests in mineral resources and alternative energy would also benefit from the technological opportunities afforded by ongoing investment in telecommunications - underpinning the long term sustainability of our region.

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. One of our members, Burke Shire has been able to deliver high speed broadband, public wi-fi and 4G technology capabilities to its main centre through a fibre optic project through a partnership with Telstra. Additionally, mobile services to several remote Gulf townships, courtesy of Round 1 of the Mobile Blackspot program are being rolled out in partnership with Telstra. Telstra is now working closely with Burke, and Carpentaria Shire Councils together with GSD, to investigate the feasibility of fibre-optic between Burketown and Normanton. GSD is a Remote Area Board (RAB) that attracts funding from the Department of State Development. The fibre-optic between Burketown and Normanton is one of the projects that GSD has asked for funding under the auspice of RAB to complete the feasibility and planning documents necessary for this project. Telstra have indicated that should GSD be successful in gaining this funding, they will also make a substantial commitment. Investment in this infrastructure will close a loop and increase resilience to 75% 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. They are vital for the future economic development of the Gulf.

GSD does 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 communities have achieved critically important connectivity within the current unregulated environment.

GSD believes in 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. 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.

GSD believes 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.
Our Vision: “The Gulf Savannah will be recognised nationally as a dynamic region where people want to invest, work, live and play”