

31st May, 2017

**Submission to the Australian Competition and Consumer Commission
on the
DRAFT Mobile Roaming Inquiry
from the *Western Australian State Council of the Isolated Children's Parents' Association of Australia Inc. ICPA (Aust)***

The Isolated Children's Parent's Association of Western Australia (ICPA WA) are very pleased to see your recent draft decision to not regulate mobile roaming. To our organisation, the decision paper clearly articulates that regulated mobile roaming would be the wrong decision for regional and remote customers and place a huge risk on future network investment whilst at the same time potentially increasing mobile costs.

Our member families reside in regional, rural and remote Australia and all share a common goal of achieving access to education for their children and the provision of services required to achieve this. As noted in our original submission many of our members live on large isolated stations, great distances from their nearest community with their only access to education being via distance education programmes. For our members, communications are critically important for both the delivery of education as well as enabling us to conduct business.

Mobile coverage is one of the most important issue for our members and we are concerned that a key risk of regulated roaming is that the price of mobile calls and data may increase in rural areas. This could potentially occur if mobile operators respond to the challenge of roaming by imposing a surcharge on their rural customers who choose to roam onto another provider, rather than the national average prices charged today. Even if prices remain nationally averaged, operators would raise those prices to recover the cost of using roaming services.

Rural mobile customers have made it clear to the ACCC that improvements in mobile coverage are absolutely critical. Since coverage cannot be extended further without new investment, it is equally critical that mobile providers continue to invest in their rural networks on both a standalone basis and as co-investment partners with governments.

Our organisation believes that unless more investment is made in the development of communication infrastructure in rural and remote locations, discrimination against rural residents will continue. Without a funding boost to this section of the Australian population, those residing in rural and remote Australia will find it difficult to achieve par with their urban counterparts due to historically low initial levels of funding. Lack of equity will continue as an issue for rural Australia.

In closing, ICPA WA ask for the draft decision to be confirmed as soon as possible so that investment in rural and remote mobile coverage is not put at further risk and can continue.

Kind regards,



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