

Dear Review Staff,

Introduction:

I am writing this review solely as a new resident of NSW Central West and Far West (Orana) Region having moved here some 4 years ago from Sydney and as such, the references below are specific to these Regions alone.

The government is always trying to encourage government agencies, private businesses and individuals to move to regional, rural and remote locations to lessen the burden on our major Australian cities but never really puts its money where its mouth is and follows up with the services to encourage this decentralisation. Mobile roaming would be just one of the services that need to be put in place to encourage this movement to occur.

*The definition of "roaming" is as follows:- Roaming ensures that a traveling wireless device (typically a cell phone) is kept connected to a network without breaking the connection. In [wireless telecommunications](#), **Roaming** is a general term referring to the ability for a [cellular](#) customer to automatically make and receive voice calls, send and receive data, or access other services, including home data services, when travelling outside the geographical coverage area of the home [network](#), by means of using a visited network. For example; should a subscriber travel beyond their cell phone company's transmitter range, their cell phone would automatically hop onto another phone company's service, if available.*

Using another phone company's service can be done by using the subscriber identity in the visited network. Roaming is technically supported by mobility management, [authentication](#), [authorization](#) and [accounting billing](#) procedures (known as AAA or 'triple A').

As stated above and throughout this submission, "roaming" is no longer considered a 'nice to have' rather it is a basic and essential service to farmers in this day and age!

The government needs to lead by example and cannot simply continue to make statements such as "there is no clear evidence...." because of reviews that are poorly conducted or outdated internal strategic documentation that can no longer be relied upon. An up-to-date Commonwealth ICT Strategy should cover Mobile Roaming. The public expects such documentation to be kept up to date and to be complete in its coverage.

Background:

We are a medium sized cotton and mixed farming business of nearly 8,000 acres located in Narromine NSW approximately 20 minutes from Dubbo.

The regions being referenced are the Central and Far West regions of NSW (which includes the cities of Bathurst, Dubbo, Orange, the large towns of Cowra, Parkes, Lithgow and the smaller towns of Oberon, Mudgee, Forbes, Canowindra, Molong, Grenfell, West Wyalong, Condobolin, Eugowra, Bogan, Bourke, Brewarrina, Cobar, Coonamble, Gilgandra, Narromine, Walgett, Warren and Warrambungle).

Telecommunications that are fast and reliable are ESSENTIAL for our farming business as more and more technology comes to the farm and more and more businesses and government agencies that support farming expect on-line / digital communications and uploads.

Some of these data downloads and uploads include; uploading cotton and crop harvesting yields directly from the tractor to the cotton gin or storage silo agents, receiving and reviewing water and soil probe data (level of nitrogen and other essential elements for healthy crop production) directly from the field to the farmer and/or agronomist for immediate and historical (precedent-based) decision making.

There also live data feeds from cotton pickers and other machinery anywhere on-farm or off-farm (contracting) to the main farm office identifying engine or other problems, fuel consumption etc., which enables just-in-time management of this machinery and equipment.

There is also telemetry data (direct from satellites) for overlaying field and crop health which is received on a 7 day cycle basis (this cycle to be reduced over the next 2 years as more satellites become available) In the coming year, it is hoped that livestock will be fitted with Radio Frequency Identification Data (RFID) tags so livestock whereabouts and health can be monitored remotely, however, given the current level of telecommunications services here, it is doubtful that this would be successful.

In the last year we commenced the use of drone technology to review fields and crops, livestock and also water channels (water overflow remediation) and tree and boundary lines for fencing requirements. The success of this directly relies on the availability of mobile phone technology.

More recently as regional and rural theft and crime is increasing, surveillance of our farm, livestock and machinery will also require a mobile technology solution which in turn, will require roaming features.

All data sets generated or acquired by the farm are integral to the success of the farming business and at the moment, we struggle to keep abreast of the new digital demands being placed on us as we experience 20 – 30 internet drop-outs per day. These drop-outs have been attributed to off-farm services rather than our farm hardware or software.

Despite patchy mobile coverage, and slow upload and download speeds, I note with some concern that the third review into "roaming" has resulted in the ACCC deciding NOT to recommend mobile roaming be mandated in Australia.

The ACCC has stated that "There is insufficient evidence to suggest that declaration of a mobile roaming service in regional and rural areas would further lower prices or improve services, given the higher costs of servicing these areas."

Telstra has "vehemently opposed" mobile roaming. I would ask, why would Telstra object so strongly? Telstra says that it will reduce the value of their assets. In fact, Telstra is already reducing the value of their own assets because they are allowing longer maintenance times and callouts for faulty lines and services. I feel that Telstra would be quite anxious about having more competition in this field and as such, does not want to see roaming competitors enter the marketplace.

Given the ACCC Chairperson (Mr Sims) has stated that there is uncertainty of the value or otherwise of roaming for regional, rural and remote areas, this tells me that the review was flawed and vital data and modelling not well developed which would otherwise have clearly shown the need for this service. Further detailed analysis obviously needs to be undertaken.

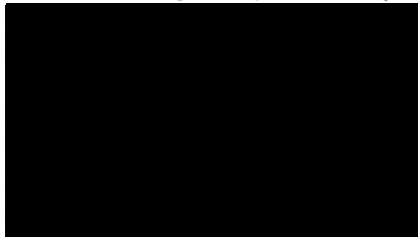
Recommendations:

1. I would strongly suggest that the ACCC re-open the review to improve the modelling already undertaken (if indeed modelling has been undertaken),
2. Please review the Australian Bureau of Statistics data for the Central West Region of NSW for population growth, household and dwelling construction projects up to 2031 or beyond as part of your deliberations. Here is a link to get you started -
http://stat.abs.gov.au/itt/r.jsp?RegionSummary®ion=103&dataset=ABS_REGIONAL_ASGS&geoconcept=REGION&datasetASGS=ABS_REGIONAL_ASGS&datasetLGA=ABS_NRP9_LGA®ionLGA=REGION®ionASGS=REGION
3. And also the Far West Region of NSW -
http://stat.abs.gov.au/itt/r.jsp?RegionSummary®ion=105&geoconcept=REGION&dataset=ABS_REGIONAL_ASGS&datasetLGA=ABS_NRP9_LGA&datasetASGS=ABS_REGIONAL_ASGS®ionLGA=REGION®ionASGS=REGION
4. Included also as follows is a Central Western Daily Newspaper article that gives some population growth highlights for the region -
<http://www.centralwesterndaily.com.au/story/2430261/orange-bathurst-dubbo-which-will-be-the-largest-city-in-2031/>
5. If not already available, please also publish the current review findings overseen by Mr Sims where he rejected mobile roaming so we the public can understand how the review was undertaken, what data was included and / or generated from this review.
6. I also remind the ACCC of the governments' floundering with its own out-of-date Australian Public Service ICT Strategy 2012 – 2015 which requires review and assessment to publicly make available the success or failings of that strategy as well as a new strategy to address any shortcomings or changes in technical direction -
https://www.finance.gov.au/archive/policy-guides-procurement/ict_strategy_2012_2015/

Regards,



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