



Submission to the Australian Competition and Consumer Commission – Regulated Mobile Roaming Draft Decision

Australia is a vast continent with more than one third of the population (34.1%) living outside its major cities. Of this non metropolitan population, almost 20% is dispersed across more than 1500 rural and remote communities with fewer than 5000 residents.

Patients living in remote communities continue to have limited access to eye health care and also have a higher burden of blindness and impaired vision – particularly Indigenous populations.

The challenge in addressing the gap in eye health is connecting regional and remote West Australians to eye health services. People living in regional and remote areas have significantly less access to eye health services than metropolitan residents. In remote WA, eye specialist coverage is up to 19 times lower than in urban Australia and rural residents are three times less likely to have seen an ophthalmologist. The estimated cost of filling the eye health gap – that is, the cost to provide eye specialist coverage in regional and remote WA to match the level of service offered to urban residents – is a staggering \$33 million.

Lions Outback Vision (LOV) provides outreach ophthalmology and optometry services to regional and remote Western Australia with a commitment to improving access to comprehensive and appropriate eye health care services irrespective of where people may live.

To achieve this outcome LOV is dedicated to the development and implementation of innovative and sustainable models of eye health service delivery which relies on the accessibility and reliability of mobile telecommunications in the regions.

Delivering services in the regions requires information technology infrastructure which is reliable and able to accommodate the demands and complexity of contemporary information and the exponential development in electronic data management and software. To date, Telstra is the only provider who has been willing to make this investment.

It is essential that those providers who are willing to make the investment to redress the current economic and social disparities and the future growth of regional communities are supported in their attempts. Regulated roaming does not consider, nor protect, the substantial investment already made by Telstra in the endeavour to address the divide in modern telecommunications between urban and regional Australia.

The introduction of regulated roaming services is not likely to encourage Telstra's competitors to invest; and may potentially reduce any incentive for Telstra to invest in further infrastructure in remote areas, only to have their competitors gain a commercial advantage at Telstra's expense.

Critically important communications connectivity has been achieved in regional and remote Western Australia in a market which is currently open and competitive with all operators competing on the same terms.



Lions Outback Vision

The market is not failing, nor is regulatory intervention required to improve regional telecommunications, rather investments that expand and improve mobile coverage in remote and regional Australia that will deliver expanded coverage and improved services to those who most need them.

Increasing investment in telecommunication infrastructure and service provision offers very real opportunities to improve health and safety in remote areas. The opportunities for Co-investing drives choice, coverage and competition and the Australian market already promotes competition and choice by giving competing network operators access to one-another's base stations for co-location of equipment, as well as access to data transmission links at regulated prices.

Regulation of mobile roaming will not address coverage issues in regional Australia. Rather, it has the potential to stall investment in regional mobile infrastructure. We encourage a competitive market position that offers choice and encourages competition that drives real investment and parity of service in our regions and support the ACCC draft decision.



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