



Every Queensland  
community deserves  
to be a liveable one

10 May 2023

Ms Gina Cass-Gottlieb  
Chair  
Australian Competition and Consumer Commission

Email: [rmii@acc.gov.au](mailto:rmii@acc.gov.au).

Dear Ms Cass-Gottlieb,

**RE: Regional Mobile Infrastructure Inquiry - Report on preliminary findings**

The Local Government Association of Queensland (LGAQ) is the peak body for local government in Queensland. It is a not-for-profit association established solely to serve councils and their needs. The LGAQ has been advising, supporting, and representing local councils since 1896, enabling them to improve their operations and strengthen relationships with their communities.

The LGAQ does this by connecting councils to people and places; supporting their drive to innovate and improve service delivery through smart services and sustainable solutions; and providing them with the means to achieve community, professional and political excellence.

The LGAQ would like to provide a brief submission in response to the report on preliminary findings of the Regional Mobile Infrastructure Inquiry.

For many years now the LGAQ has focussed advocacy on the availability of digital connectivity and mobile phone services for Queensland's most regional and remote communities. We have long-standing advocacy in support of mobile roaming and support of third-party infrastructure and co-location of services to increase the available carriers to communities as well as bolster the overall coverage of areas that remain under serviced.

As such we are supportive of some of the findings of the Regional Mobile Infrastructure Inquiry.

As per findings 16, 17 and 18, we believe there is a clear need for legislation to be updated and amended to be inclusive of infrastructure providers that are not necessarily delivering mobile services to consumers. While this is being looked at by the Federal Government, there needs to be a review of what the industry will look like going forward and how we can create a market for infrastructure providers that will include investment into regional and remote areas that are not currently seem as attractive due to the limited customer base (Finding 19, 20, 23, 24, 25, 26).

The LGAQ supports the findings around the inadequacy of historical legislation in the context of the contemporary trend towards non-Mobile Network Operators infrastructure providers, who are not currently a party to the regulatory frameworks (Finding 21, 22, 23).

Vulnerable communities need access to mobile phone services, and without a re-drafting of legislation, re-design of the Mobile Black Spot Program and an examination of models that will ensure infrastructure builds happen in these areas, communities will continue to be left without vital connectivity.

As the copper network diminishes as the cornerstone of vital communications infrastructure in rural and remote areas, a re-examination of what the Universal Service Obligation means in the future should be part of this discussion.



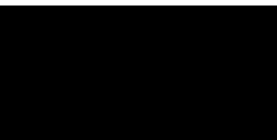
The LGAQ is strongly supportive of any examination into the feasibility of mobile roaming. In fact, we believe this is a must. The introduction of roaming as part of the available tools in an emergency response is without a doubt something that should be enabled in Australia. This is especially the case in a state like Queensland – which is Australia’s most disaster-prone, and decentralised state.

Though there may be difficulties in establishing mobile roaming for emergency responses – to look at it as not “mission critical” is to needlessly downplay the valuable assistance it could give in a crisis situation, and how important the facility would be as part of the suite of available options to emergency responders and people caught in an emergency event (Finding 27, 28, 29).

The LGAQ urges further scoping work to establish the costs and logistics of implementing temporary mobile roaming for emergencies, with a view to how it has been achieved in other countries and could be replicated here in Australia.

The LGAQ is available for consultations, or to help facilitate locating regions for trial sites for emergency roaming should this concept progress.

Yours sincerely,



Alison Smith  
CHIEF EXECUTIVE OFFICER