



Hon Jaala Pulford MP

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Grahame O'Leary
Director, Regional Mobile Infrastructure Inquiry
Australian Competition and Consumer Commission
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Dear Mr O'Leary

Thank you for the opportunity to provide input into the Australian Competition and Consumer Commission's (ACCC's) Regional Mobile Infrastructure Inquiry.

In recent years Victoria has been impacted by significant emergency events that have highlighted vulnerabilities in the telecommunications network. These include the 2019-20 Eastern Victoria bushfires, the June 2021 flood and storm and October 2021 storms, all of which affected network availability to varying degrees during the emergency and in the recovery phase.

The Victorian Government is acting now to reduce these vulnerabilities and improve community safety. We have made record amounts of investment to remediate blackspots and improve the quality and reliability of service including through the \$550 million Connecting Victoria program and co-funding initiatives under the Strengthening Telecommunication Against Natural Disasters (STAND) program.

Victoria strongly supports emergency roaming as part of a suite of important investments and reforms needed to improve the resilience of our telecommunications infrastructure. I am encouraged by the ACCC's submission to 2021 Regional Telecommunications Review (RTR) which acknowledged that targeted emergency roaming measures might provide an important safety measure that would not impact the overall competitive dynamics in the market.

In considering the feasibility of roaming I urge the ACCC to continue giving due weight to the critical and growing public safety role performed by our networks in emergencies. I appreciate that the ACCC recently met with the Department of Jobs, Precincts and Regions to discuss the inquiry and I would also welcome the opportunity for Victoria to be consulted on the design of an emergency roaming capability.

I have enclosed Victoria's submission to RTR. The submission elaborates further on Victoria's position on emergency roaming and also addresses matters relating to infrastructure sharing. Key policy positions are summarized as follows:

- The Commonwealth Government needs to develop a solution for emergency mobile roaming to improve access to communications services during emergencies like natural disasters and better support community safety. (Refer pages 18-19.)
- Emergency roaming and infrastructure/spectrum access will be key enablers for a future Public Safety Mobile Broadband (PSMB) capability. (Refer pages 20-21.)
- Victoria supports improved availability of multicarrier telecommunications solutions in regional areas, with an emphasis on where government subsidy is provided to improve coverage. (Refer pages 26-27.)

The RTR submission addresses other matters relevant to regional connectivity and I encourage the ACCC to consider the RTR submission in its entirety. Sections that may be of particular interest to the ACCC include:

- Need for continued and scaled up Commonwealth Government funding programs. (Refer pages 13-16.)
- Infrastructure hardening opportunities. (Refer pages 19-20.)
- The need for a review into the adequacy of the Universal Service Guarantee. (Refer pages 26 and 28.)
- Victoria's willingness to support domestic mobile roaming if the Commonwealth Government and industry can resolve the potential implications on infrastructure investment and competition. (Refer pages 19, 26 and 27.)

I trust this information is of use. If you require further information, please contact Matthew Dummett, Director Telecommunications of the Department of Jobs, Precincts and Regions via email at Matthew.Dummett@ecodev.vic.gov.au.

Yours sincerely



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Enc Victorian Government submission to the RTR
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