



# Murrumbidgee Council



TELEPHONE: 1300 MRRMBGE (676 243)

Darlington Point Office

21 Carrington Street

PO Box 5

DARLINGTON POINT NSW 2706

Telephone: 02 6960 5500

Coleambally Office

39 Broilga Place

COLEAMBALLY NSW 2707

Telephone: 02 6954 4060

Jerrilderie Office

35 Jerrilderie Street

PO Box 96

JERRILDERIE NSW 2716

Telephone: 03 5886 1200

Email: [mail@murrumbidgee.nsw.gov.au](mailto:mail@murrumbidgee.nsw.gov.au)

Website: [murrumbidgee.nsw.gov.au](http://murrumbidgee.nsw.gov.au)

All correspondence to be addressed to:

General Manager

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The Secretariat,  
ACCC Domestic Mobile Roaming Declaration Inquiry 2016

## SUBMISSION BY MURRUMBIDGEE COUNCIL

Murrumbidgee Council appreciates the opportunity to make a submission to this important Inquiry. Murrumbidgee Council was created in May 2016 via the merger of the former Jerrilderie Shire Council and Murrumbidgee Shire Council. The Council covers an area of some 6,880 square kilometres with a population of 4,047.

A large part of the rural area contains a significant irrigation district being Coleambally Irrigation. There are also a significant number of individual farm irrigators.

The Murrumbidgee Council is an important food and fibre source for Australian consumption and for export purposes, producing a wide range of summer and winter grain crops, fruit, vegetables, horticulture, cotton, viticulture, dairy and livestock.

Aside from the main urban centres within the Council area, mobile phone reception is mostly far less than satisfactory. In most of the rural and remote areas the mobile coverage is considered to be deplorable, with large parts of the region having no service whatsoever. In turn, this sometimes creates dangerous conditions for residents and infrastructure in bushfire and flood prone areas, as well as during other times of emergency accident and storm circumstances.

The absence of effective mobile coverage has again been very much an issue of concern in the current floods being experienced in the Murrumbidgee Valley area.

On the major highways such as the Sturt Highway, Newell Highway and Kidman Way, there are many hundreds of kilometres with nil or extremely poor mobile phone coverage. In addition, many locations which have high tourism numbers unfortunately also suffer poor network coverage, very much to the angst and inconvenience of visitors and business people holidaying in the Council area.

Council has previously made submissions to the Federal Government in relation to the Mobile Blackspots Program, although very few locations have received funding to date. Unfortunately, it seems that there is little prospect of significant mobile network expansion in the foreseeable future.

Obviously, coverage is the critical issue of importance for regional mobile customers and in the Murrumbidgee Council area the major MNO is Telstra, and to a lesser extent Optus and Vodafone.

Telstra have made the point to Council that during the last decade it has expended 15% of its mobile phone investment on extending coverage to the last 2% of the national population, and that Telstra's investment strategy is geared to continuing that momentum.

On that basis, Telstra maintains strongly that the current regulatory settings already deliver efficient competition and provide a level playing field for Telstra, Optus and Vodafone to invest in their own competing regional and rural mobile networks. Telstra believes that regulated roaming will remove the business case for Telstra to further extend its network coverage in regional Australia, which in turn will impact on the opportunity for further network investment in the Murrumbidgee Council area.

Realistically, Telstra is probably the only MNO which is likely to expand network coverage in this region. The concern therefore is that any mobile roaming declaration whereby Optus and Vodafone would have access to the Telstra network could in turn severely prejudice the opportunity for further Telstra expansion.

Telstra therefore argues that its future expansion strategy will be threatened, even though Telstra would no doubt receive income from other MNO's utilising the Telstra network.

On the other hand, it is unrealistic to expect that all three network providers would invest in significant network infrastructure, nor would that be logical or efficient. A shared network, based on fair and reasonable financial terms, would seem to be the most efficient outcome.

Conversely the concern is that unless mobile roaming is declared, Optus and Vodafone customers will simply have little or nil coverage in this Council area, certainly outside of the main urban centres. Some of those people will no doubt be our residents and others will most likely be people travelling through the area. However, in either category, it seems to be essential for those Optus and Vodafone customers to have access to the best possible phone services, particularly these are critical to cope with emergency circumstances.

In summary, the challenge is to ensure that investment by Telstra in future expansion of existing mobile network coverage to rural and remote areas is not prejudiced. On the other hand, customers on other networks are entitled to have best possible mobile network access.

Hopefully ACCC can resolve fair and equitable determinations that will satisfy these competing and challenging objectives.

Yours Sincerely,



Andrew Crakanthorp,  
Deputy General Manager