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Grahame O’Leary
Director
Transmission and Facilities Access Section
Mobiles, Transmission and Consumer Branch
Australian Competition and Consumer Commission

Primary Producers SA Inc.

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Dear Mr O’Leary

Primary Producers SA (PPSA) appreciates the opportunity to comment on the *Australian Competition and Consumer and Commission (ACCC) Regional Mobile Infrastructure Inquiry: Consultation Paper*.

Primary Producers SA (PPSA) is the peak industry body representing the interests of SA primary producers. PPSA current members are Grain Producers SA, Livestock SA, SA Dairyfarmers’ Association, SA Forest Products Association, Horticulture Coalition of SA, and the Wine Grape Council of SA.

PPSA is the South Australian member of the National Farmers Federation (NFF), and we support the implementation of the NFF Roadmap to exceed \$100 billion in farm gate value by 2030.

Key to achieving this target will be ongoing improvements to telecommunications and connectivity services in regional Australia. PPSA stands with the NFF in advocating for regional communities to have accessible, reliable, quality, and affordable telecommunications and connectivity services, and support all recommendations in the submission responding to this inquiry by the NFF.

PPSA recognises the vital role that mobile telecommunications play in today’s modern and increasingly technologically sophisticated primary industries sector. We see a key role for government to invest in mobile infrastructure to support digital connectivity in South Australia’s rural and regional communities, and to service the primary industries sector.

PPSA wishes to highlight two important areas from a South Australian perspective; that mobile telecommunication is essential for a profitable and sustainable agricultural sector, and that mobile telecommunication is essential in providing life-saving assistance in times of emergency.

1. South Australian primary producers need accessible, reliable, quality, and affordable telecommunications and connectivity services to operate efficiently and support new digital technologies that improve on-farm productivity and sustainability.

As one of the least densely populated states in Australia, South Australia, and the regionally based primary industries sectors battle to demonstrate the commercial incentive for network operators to invest in expanding the current mobile telecommunications network.

The Mobile Black Spots Program (MBSP) has successfully delivered incremental improvements over time; however, we have been made aware by telecommunications providers that many gaps remain, as investment is often deemed commercially unviable in areas of low population density.

Adoption of new agricultural technologies are increasingly reliant on digital connectivity, yet many areas of South Australia cannot access reliable mobile services. Sustainable and profitable agriculture in South Australia is dependent on being able to access and make full use of digital innovations and efficiencies such as ag-tech applications, crop data analysis, animal health monitoring, to list just a few.

More importantly, there are many producers in South Australia who cannot conduct day-to-day business via phone without being at their home or office base. Modern agriculture is reliant on agile decision-making regarding areas such as marketing, purchasing, and weather forecasting. In some industries, the ability to make an agile decision while in the paddock could make a difference of thousands of dollars in return for produce.

The advent of low-orbit satellite technology is an exciting development, and many producers in South Australia are exploring how this may assist them in achieving greater connectivity. PPSA is open to exploring how this, and other innovative digital technologies can be rolled out equitably to deliver greater connectivity.

2. South Australian producers need accessible, reliable, quality, and affordable telecommunications and connectivity services to provide life-saving assistance in times of emergency.

We strongly support the NFF in their call to deliver greater coverage availability for emergency use. This is an important and urgent consideration for the ACCC inquiry.

All too often it is local primary producers and their staff who are the first on the scene of emergency incidents. With no mobile service, they are faced with the decision to stay at the incident or drive to gain service to call for help.

For example, despite being the major north-south corridor for freight and an increasing number of tourists from Adelaide to Darwin, the Stuart Highway continues to be plagued with black spots. This is a continuing cause of angst and anxiety for the residents of the surrounding area.

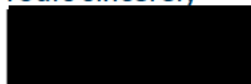
Likewise, in more concentrated farming areas where bushfires necessitate a coordinated triple-zero nature, essential coordinating calls cannot be connected.

As identified in the *Consultation Paper*, temporary roaming arrangements are widely seen as a practical, and positive solution to this vital issue, and PPSA would support any such policy.

In summary, PPSA sees an ongoing role of government regulatory settings and targeted investment to support the coverage of essential mobile infrastructure in regional South Australia. We welcome the development of recommendations arising from the ACCC inquiry to directly address the economic and social inequity in mobile coverage across remote, rural, and regional communities.

If you, or the department have any queries regarding this submission, please feel free to contact Policy Director, Cam Parker, via policy@ppsa.org.au.

Yours sincerely

A black rectangular box redacting the signature of Caroline Rhodes.

Caroline Rhodes
Chief Executive Officer