



26 May 2017

Australian Competition and Consumer Commission
via email: mobileroaminginquiry@acc.gov.au

Dear Sir/ Madam,

RE: DOMESTIC MOBILE ROAMING INQUIRY

The Pyrenees Shire Council welcomes the draft decision on the Domestic Mobile Roaming Inquiry released by the ACCC May 2017.

Council appreciates the desire to create an environment of market competition in order to deliver competitive pricing for consumers.

In rural areas however, where infrastructure is lacking and coverage is poor, Council has for some time advocated for increased investment in base stations to extend the mobile network so that more remote communities are not disadvantaged.

The introduction of the Federal Mobile Blackspot Program has provided an incentive for MNOs to invest in these areas, and the Pyrenees Shire has been a recipient of this investment.

While this investment by the Federal government is welcome (along with financial contributions by the state), there is a requirement for the MNOs to invest also.

Despite the improvements that have been made, and others that are planned, a significant part of the Pyrenees Shire is not adequately serviced, and this lack of mobile service creates disadvantage in these communities, where risks due to emergencies are exacerbated and economic growth is stifled.

Telstra has advised through this inquiry, that the introduction of a mobile roaming declaration will provide a disincentive for future investment in infrastructure to develop the network coverage in rural areas. This is acknowledged in the draft report which states, "*...there is a risk that declaration may in fact distort efficient investment incentives.*"

For these reasons, Council supports the draft decision not to declare mobile roaming.

Yours Faithfully,

Jim Nolan

Chief Executive Officer

Pyrenees Shire Council



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