

9 December 2016

Australian Competition and Consumer Commission  
[mobileroaminginquiry@acc.gov.au](mailto:mobileroaminginquiry@acc.gov.au)

Dear Sir/Madam

## Mobile Roaming

As a consumer of data services, Queanbeyan-Palerang Regional Council has concerns with a proposal of Domestic Data Sharing.

On the surface, the strategy appears to have consumers in mind. It proposes to increase the availability of data services to a wider customer base and provide better service.

When it is looked at closer, and reviewed with other global schemes similar to this, there has been deeper benefit to the consumer market.

The enforcement of domestic data sharing in other countries has resulted in a sharp decrease of infrastructure investment. Capital funding has been shifted from infrastructure to administration. Customers have actually been disadvantaged as infrastructure development has decreased.

It has been suggested that the regulation on domestic data sharing in the United States and Canada are not comparable to the Australian market place. QPRC disagrees with this statement.

Canada and the United States have the same struggles if not greater ones for companies to deliver. The implementation of data services to the far north of their countries is far more challenging than rural Australia. Comparison of these difficulties need to be taken into account in making a decision on Domestic Data Sharing.

QPRC would prefer to see capital spending by the companies invested in infrastructure expansion rather than pushed towards the administration of the agreements.

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Each company will have its strategy and capital investment plans. These should be allowed to continue unhindered by regulatory changes and overhead.

Consumers will still have choice and more choice if a competitive market is allowed to continue and be focused on infrastructure rather than administration. As the NBN continues its rollout, and other service providers expand, the growth of data services will be available exponentially.

Reviewing the data from other countries who have put domestic data regulations in place has significantly slowed expansion and provided no marked difference in service.

With all of this in mind, QPRC does not recommend a domestic data regulatory framework in any form. We perceive this as slowing infrastructure and that costs associated with the administration of such a scheme will be passed onto customers.

Yours sincerely



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