

5 June 2017

Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

**Re: Submission to the ACCC draft decision for the domestic mobile roaming declaration inquiry, May 2017**

Regional Development Australia (RDA) Central West is pleased to provide the following information in relation to the ACCC draft decision for the domestic mobile roaming declaration inquiry.

**Introduction and Background**

Regional Development Australia Central West (RDA Central West) is a not-for-profit organisation, funded by the Commonwealth and State Governments, responsible for the economic development and long term sustainability of the NSW Central West region.

Approximately 174,000 people live in the region, which comprises the Local Government Areas of Lithgow, Oberon, Bathurst, Blayney, Orange, Cabonne, Cowra, Parkes, Forbes, Weddin and Lachlan.

Challenges remain in ensuring that the telecommunications infrastructure planned for the Central Western NSW region is able to meet the needs of businesses and community members now and into the future, with mobile networks key to this.

**Terms of Reference**

RDA Central West welcomes the approach to keep geographic coverage of regional mobile networks at front of mind when considering the draft decision for the mobile roaming declaration inquiry.

Regarding the 'Issues for Further Consideration', as outlined in the draft decision, RDA Central West supports the introduction of additional policy measures and other developments which help to increase competition and, in particular, coverage of mobile networks in regional areas. There remains a need to significantly improve outcomes for regional Australians in this regard.

Firstly, there needs to be ongoing Government support and continuous improvement for programs like the Mobile Black Spot Programme (MBSP). Without any further Government

funding committed to this or similar programs there are few avenues for communities in getting mobile black spots rectified. Additionally, our work to date across the region has found that the consideration of community need could be better factored in to the MBSP.

Additionally greater transparency of mobile network information is paramount, not only for consumers but also to assist local planning efforts. Publishing projected mobile network rollout schedules may assist consumers in choosing appropriate providers. Greater information is also needed to assist communities to identify priority mobile black spot areas and develop innovative solutions to fix them. For example efforts to improve telecommunications infrastructure across the NSW Central West region has been hampered to date due to lack of access to information that would help local planning, such as estimated coverage of MBSP-funded towers, whether multiple mobile black spots are planned to be rectified by each MBSP-funded tower, and the location of these planned MBSP-funded towers *in relation to* other existing towers to facilitate co-location and less costly solutions on the ground.

The lack of publically-available information reduces the capacity of communities to become involved in telecommunications planning and the mobile black spot rectification process.

In our view, greater incentives for co-location and infrastructure-sharing (including at the post-construction stage) are needed to ensure the most efficient use of infrastructure in regional areas. This may also assist Mobile Network Operators (MNO's) to overcome network 'islands' where only pockets of coverage currently exist, and which can be expanded upon to create more continuous coverage where it would not otherwise be possible to do so.

A wide range of alternative possible policy solutions to mobile competition and coverage issues in regional areas should be examined.

However it can be very difficult to assess the most appropriate solutions unless a holistic view of all the developments across the telecommunications sector can be examined. Under current circumstances, this is very challenging for communities and regions in order to be able to find solutions for their own futures.

We trust that our feedback will be of assistance to the Commission and welcome any further opportunities for input to the inquiry or regional engagement in Central West NSW.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Peter McMillan', with a horizontal line extending to the right.

Peter McMillan

**Executive Officer**