

## Rural City of Wangaratta

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23 November 2016

**To: ACCC**  
**Re: Mobile Roaming Enquiry**

On behalf of the Rural City of Wangaratta I wish to express concerns regarding the current ACCC enquiry into regulated mobile roaming. A decision to regulate mobile roaming could significantly reduce or entirely remove the incentive for telecommunication providers to invest in rural regions such as ours.

Recently the municipality participated in the Mobile Black Spots Program, Rounds 1 and 2. Through this program we were successful in securing several mobile towers which will provide services to area of our municipality where coverage previously has been patchy at best. The significant success we achieved through this program came at a modest cost to Council and the rate payers of the region. This success was mainly due to the significant collaboration and investment made by Telstra in this program. It should be noted that Telstra was the only provider interested in delivering services to these identified black spots.

There is a strong possibility that should regulated mobile roaming be introduced, telecommunication providers could withdraw from proposed future investment in their mobile networks, in the less viable, sparsely populated Rural and Regional areas. In a very competitive industry sector it is understandable providers would desire to protect their commercial interests. Telstra has recently announced their commitment to continuing investment in growing their network over the next 5 years to the extent of around \$790 million.

Regulated mobile roaming poses a significant threat to this much needed network expansion funding as it would become uneconomic and undermine Telstra's ability to continue with investment in the regional network.

The continued development of mobile communications networks in rural and regional areas is critical for a range of economic development activities including small business, working from home, technological advancements in Agriculture and Agribusiness, and Tourism – all of which are vitally important to our Region.

Rural City of Wangaratta urges the ACCC not to support regulated mobile roaming and encourage the telecommunication providers to continue investing in their expansion of the regional and rural networks.

Yours sincerely



Brendan McGrath  
**CHIEF EXECUTIVE OFFICER**