



THE SOUTH AUSTRALIAN  
**COUNTRY WOMEN'S  
ASSOCIATION**  
INCORPORATED

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**Submission to Support ACCC Draft Decision Not to Declare Domestic Mobile  
Roaming Service 30/5/2017**

The South Australian Country Women's Association Incorporated (SACWA Inc) has been serving the community since 1929. It is not for profit, non party political and non sectarian. The organisation is made up of volunteers who work to promote the welfare and conditions of life for women and children of all ages, whether in urban areas or regional, rural or remote areas.

SACWA has over 2,000 members throughout South Australia in 120 branches in urban, regional, rural and remote areas.

At the SACWA State Council on 27<sup>th</sup> October 2016 the following recommendation was passed unanimously. "That SACWA opposes the concept of domestic mobile roaming, being concerned about the loss of investment in networks, the loss of employment for Australians and the associated impact on mobile coverage in regional areas .

The SACWA Inc welcomes the ACCC Draft Decision proposing not to declare a domestic mobile roaming service.

The SACWA Inc supports the findings of the ACCC that:

- There is reasonably effective competition in the national mobile services market. Service providers compete on a broad range of product features such as price, geographic coverage, service quality, network technology, inclusions and content. The difference in geographic coverage is contributing to competition.
- In some regional, rural and remote areas of Australia, choice of mobile service provider is not available or is more limited. However, these consumers still benefit to some extent from competition outside of these areas due to national uniform pricing.
- There is insufficient evidence that, given the current state of competition, declaration of a mobile roaming service is likely to promote overall competition to a significant extent.
- There is evidence that mobile network operators are continuing to make efficient investments to compete on regional coverage. Declaration of a mobile roaming service in these circumstances may distort efficient investment incentives.

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