23 November 2016

The South Australian Country Women’s Association Incorporated (SACWA Inc) has been serving the community since 1929. It is a not for profit, non party political and non sectarian organization. The organization 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 Inc has over 2000 members throughout South Australia in 120 branches located in urban, regional, rural and remote areas.

At the SACWA Inc State Council on 27th October 2016, the following recommendation was passed unanimously ‘that SACWA opposed 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 and remote areas’.

The SACWA Inc is concerned that the future of networks in remote, rural and regional areas would be at risk if a declaration of a mobile roaming service is made:

- It would discourage future investment in the existing networks – thus leaving those areas with an inferior service to the areas where there is a greater competition. Why would a service provider invest in infrastructure developments in these areas for other providers to use, when those other for profit providers are not making investments in those areas themselves?
- It would create uncertainty for the industry and would be natural for all carriers to reconsider their regional investment plans.
- If declaration is confined to the 3G network, would this mean regional networks would be deprived of future developments in mobile technology? This would create an inequitable service!

To quote the ACCC’s ‘A Guide for Consumers’, ‘If a domestic mobile roaming services is declared, mobile network operators may lose a selling feature by being required to share their network with their competitors. This may reduce incentives for the host network to make further investments in maintaining, upgrading and extending their mobile networks. It may also reduce incentives for the roaming network to invest in their network, as they may seek to rely on the ability to roam onto another network to provide services, rather than extending their own network.

SHARING & CARING WITH ACTION Non-Profit, Non-Party Political, Non-Sectarian
Expansion of networks in remote, rural and regional Australia creates opportunities for employment in these areas at a time when employment opportunities are disappearing, particularly in regional areas.

Thank you for the opportunity to make this submission on behalf of our members.

Linda Bertram
State President
The South Australian Country Women's Association Inc.