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Our Ref: RP:jh OUT13/13/7674

12 November 2013

Priya Balachandran
Senior Project Officer
Australian Competition & Consumer Commission

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Dear Ms Balachandran

RE: ACCC REVIEW - DOMESTIC TRANSMISSION CAPACITY SERVICE

Mitchell Shire is a designated growth area located north of Melbourne and we actively advocate for improved telecommunications services for our businesses and community. Equal access to reliable, high quality telecommunications services is crucial to future economic development in Mitchell Shire and for the safety of our communities.

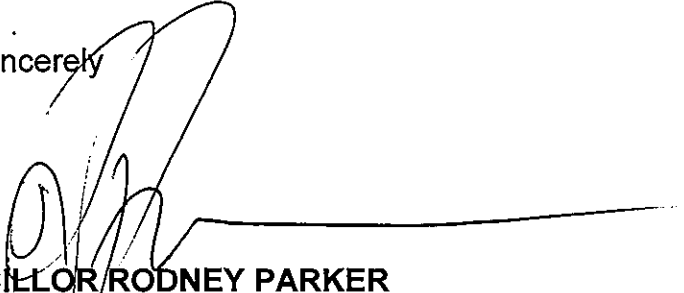
Mitchell Shire Council urges the ACCC to legislate in ways that support a more equitable access to services and would ask it to take the following points into consideration:

- Council supports active collaboration between federal and state governments and mobile telecommunications businesses as a means of improving services and affordability. It urges the ACCC to give full consideration in its review to regional and rural service access and affordability
- Equitable access to telecommunications is crucial if our rural economy is to develop and compete. Businesses increasingly rely on the ability to access information and provide customer services through mobile and internet connections. Businesses that are unable to compete on a level playing field are increasingly at a significant disadvantage
- Patchy network coverage also puts our communities at risk during emergencies at a time of increasing reliance on mobile and internet-based warning systems
- These issues of unreliable access and failing signal strength are unlikely to be resolved without investment in infrastructure
- Council believes the ACCC should develop a more comprehensive and effective pricing model that accurately reflects the costs of accessing existing backhaul infrastructure. A pricing regime for declared transmission services which delivers true cost based prices would make the market more attractive to service providers, opening the way for increased competition which would benefit the long term interests of our communities and businesses.
- Co-location of service providers with shared infrastructure is one solution. While it would deliver best value from investment and improve coverage we recognise that it is likely to be commercially unattractive



- Backhaul pricing and access conditions should be in line with global standards, to promote equal competition
- Telecommunications providers should be encouraged by regulation to share infrastructure and facilities
- The National Broadband Network should be encouraged to actively engage with telecommunications providers to make the most efficient use of backhaul options and infrastructure

Yours sincerely

A handwritten signature in black ink, appearing to be 'R. Parker', with a long horizontal line extending to the right from the end of the signature.

COUNCILLOR RODNEY PARKER
ACTING MAYOR