



THE HON DAVID LITTLEPROUD MP

FEDERAL LEADER OF THE NATIONALS
FEDERAL MEMBER FOR MARANOVA

31st March 2023

Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601
Via email: rmii@accc.gov.au

RE: Regional Mobile Infrastructure Inquiry 2022-23

Thank you for the opportunity to make a submission to the Regional Mobile Infrastructure Inquiry 2022-23.

Regional, rural, and remote communities need and deserve equity of access to essential services. Telecommunications, and in particular mobile connectivity, is a critical service for regional communities that requires urgent attention.

As Leader of The Nationals and Federal Member for Maranoa, representing a large proportion of regional Queensland, I am acutely aware of the difficulties associated with mobile connectivity and the importance with which this needs to be addressed - not just during times of natural disaster and emergencies but for the everyday life of local communities.

For many Australians living in regional, rural, and remote Australia, not having access to telecommunications services in the event of an emergency is a reality and can sometimes mean the difference between life and death.

Domestic roaming, providing shared access to telecommunications infrastructure, is an emergency response priority as well as enabling effective commerce, economic productivity and growth, and community safety.

Mandated domestic mobile roaming

It is acknowledged that the central focus of this inquiry is to investigate the feasibility of providing mobile roaming on a temporary basis during natural disasters and other emergencies. I will address this specific application of mobile roaming later in this submission.

While The Nationals strongly support the use of mobile roaming during disasters and emergencies, it is our view that this should be expanded to permanent mandated domestic mobile roaming throughout regional, rural and remote Australia. As such we believe that this Inquiry should consider and make recommendations towards implementing permanent mandated roaming as standard in regional Australia - not just during times of disaster and other emergencies.

Mandated domestic roaming on infrastructure to provide open-access mobile coverage to users across all networks would greatly expand the level of service in the regions.



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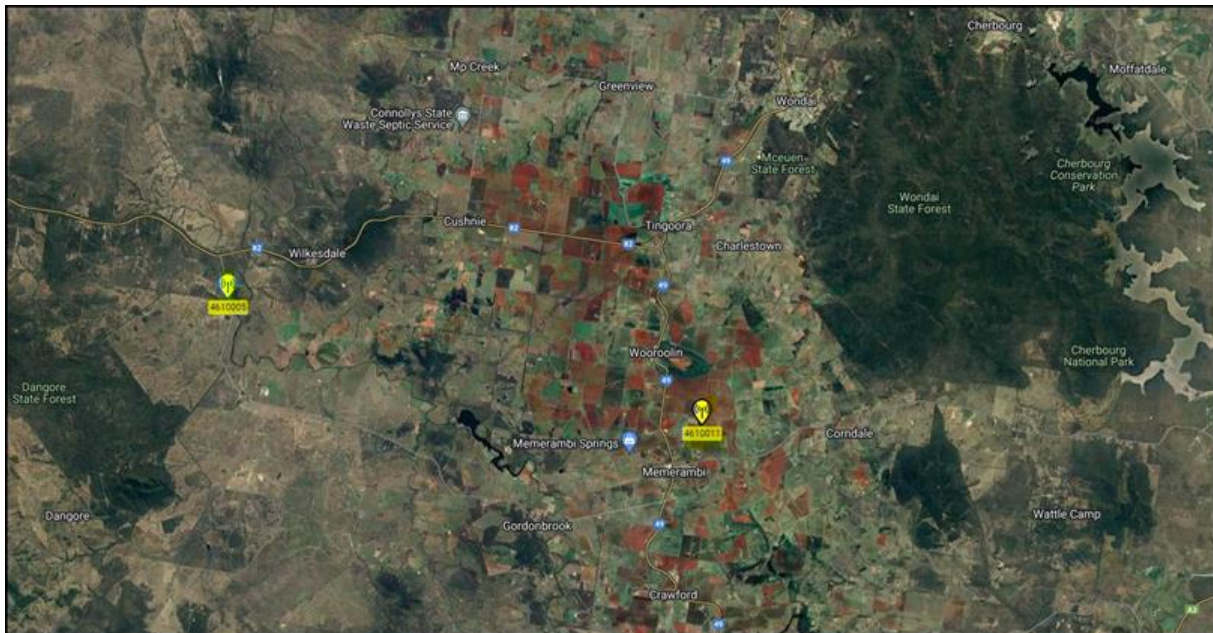
There is opportunity for this to be supported by a Universal Service Guarantee (USG) arrangement which includes mandated mobile roaming and has obligations regarding ongoing maintenance and upgrades of towers, quality of mobile service and standards of customer support. These obligations could be shared across telecommunication market providers. The aim should be to make such a reform commercially acceptable and to promote competition and technology advancement.

Since the ACCC's inquiry into domestic mobile roaming in 2017, the market has not resolved the shortfalls in mobile connectivity across regional Australia. Despite significant Commonwealth investment in expanding mobile coverage through the Mobile Blackspots Program, there remains patchy mobile service across networks that will not be fixed without mandated roaming. Further substantive expansion and infill of mobile connectivity will not eventuate from just market competition; therefore, intervention is required.

Mobile roaming in natural disasters and emergencies

In regard to the specific issue of mobile roaming during natural disasters and other emergencies, it is instructive to look at a specific case study in the Maranoa electorate.

While there are multiple locations throughout the Maranoa electorate where emergency roaming would be effective and lifesaving, the example of Gordonbrook, Memerambi and surrounds, provides a clear picture of the benefit this common sense solution would provide across different network infrastructure.



Source: RFNSA Map

On the map above, 4610005 is a Telstra 3G and 4G mobile tower located at Gordonbrook, and 4610011 is an Optus 3G, 4G, 4G+ and 5G mobile tower located at



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Memerambi. Both macro cell towers were funded via the Federal Government's Mobile Black Spot Program (Telstra tower, Round 2; Optus tower, Round 5).

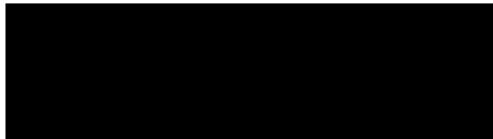
Being a rural area surrounded by state forests, this region experiences bushfires, with the most recent occurring in the first quarter of 2023. Emergency roaming activation of both towers during fires and other natural disasters would provide better coverage to all mobile phone users in the area, thus assisting response efforts by emergency services and landholders, and enabling family members to stay connected.

In such areas, police should also be able to access roaming when they make an Emergency Declaration under the Public Safety Preservation Act and other critical response efforts, such as an extensive land search effort for a missing child.

It needs to be noted that emergency response services in regional areas already face significant barriers, such as long travel distances and challenging accessibility. No time should be lost post incident when either the patient or a civilian first responder tries to call 000. Therefore, mobile service must be available to all network users as extensively as possible via permanent mobile roaming activation to enable rapid contact with emergency services for dispatch and rendering of assistance. This is a far preferable solution than simply enabling temporary roaming.

Thank you for the opportunity to submit. Mandated roaming is a necessary step to bridge the telecommunications divide in regional Australia, and I commend the work being done to investigate this as part of the solution.

Yours Sincerely



DAVID LITTLEPROUD