

To Whom It May Concern:
Australian Competition and Consumer Commission
Via email: mobileroaminginquiry@acc.gov.au

Re: Submission to the ACCC by West Arnhem Regional Council

West Arnhem Regional Council covers an area of 50,000 kms² and encompasses the communities of Gunbalanya, Maningrida, Minjilang and Warruwi and the township of Jabiru. The area has a total population of approximately 6,200. Mobile coverage does not currently extend to one of our communities, Minjilang. This is about to change once Telstra builds the tower earmarked for this island, which is expected to be operational by March 2017.

Mobile coverage is a really important issue for regional Australia. The Council strongly believes that mobile telecommunications are critical to the social and economic prosperity of the West Arnhem Region.

We have examined the subject in question and would like to put forward this submission.

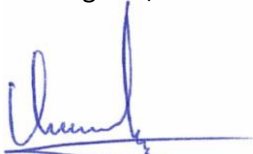
Telstra is the only telecommunications service provider in our communities and has made a significant investment in infrastructure to date. It is already an established reality that other service providers aren't in this remote market. In remote communities they have not responded to competition or market forces as it is not economically viable for them to do so.

We would question why other operators should be able to piggy-back off Telstra's investment and whether this would happen in other industries. We believe that regulated roaming across companies could destroy many of these incentives which keep companies investing and improving the overall network and could jeopardise future upgrades in coverage and technology, without delivering additional benefits.

Roaming services will promote more competition in mobile markets but this will be at the expense of Telstra which has made all of the initial capital infrastructure investment. We believe this will result in Telstra not making any future investment in the expansion of its telecommunications infrastructure or development of its network in remote areas as it won't be in its interest to do so.

In your deliberations on mobile roaming it is critical that the incentive for telecommunication organisations to invest in mobile infrastructure in regional areas be maintained. As mentioned before in this submission, so far Telstra has been the only player interested in investing in our communities. If this incentive is diminished or destroyed, we believe it would be the end for any improved or expanded telecommunication services in our area.

Kind regards,



Valentin Markez
Acting CEO