



AgForce Queensland Farmers Limited

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Ref: MG/RT/GG22070

14 October 2022

Australian Competition and Consumer Commission
Merger Authorisations Branch
23 Marcus Clarke Street
CANBERRA ACT 2601

By Email: mergerauthorisations@acc.gov.au

Dear Sirs

Re: Telstra Corporation Limited and TPG Telecom Limited proposed spectrum sharing

AgForce is a peak organisation representing Queensland's cane, cattle, grain and sheep & wool producers. The cane, beef, broadacre cropping and sheep & wool industries in Queensland generated around \$8.4 billion in on-farm value of production in 2020-21. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Over 6,400 farmers, individuals and businesses provide support to AgForce through membership. Queensland producers provide high-quality food and fibre to Australian and overseas consumers and contribute significantly to the social fabric of regional, rural and remote communities as well as stewardship of the state's natural environment.

We thank you for the opportunity to provide input to the ACCC's statement of preliminary views in relation to the Telstra and TPG application for merger authorisation for proposed spectrum sharing in regional Australia.

AgForce has a keen interest in the delivery of telecommunications and data services to Regional, Rural and Remote (RRR) areas of Queensland. AgForce is a member of the the National Farmers' Federation (NFF) and the Regional, Rural and Remote Communications Coalition (RRRCC) and endorses their joint submission to the interested party consultation.

Like the NFF, we seek for RRR communities to have accessible, reliable, high quality and affordable services. Queensland is the most decentralised state in Australia and the need for fairer, more reliable and more affordable phone and internet services remains a high priority issue. Telecommunication services are vitally important for community safety, to support business development, enhance children's education and maintain social connections.

AgForce supports the ACCC considerations and final determination contributing towards these outcomes in RRR areas in both the short and long term, including consumer choice, coverage footprint and a more competitive market and pricing environment.

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Noting concerns have been raised by other parties, the proposed agreement between Telstra and TPG would appear to support these outcomes in the near term, particularly where gained efficiencies enable further investment into services to RRR areas, including alleviating congestion and lifting reliability.

The ACCC are referred to AgForce's submission to the 2021 Regional Telecommunications Review Issues Paper (<https://www.infrastructure.gov.au/sites/default/files/documents/rtr2021-submission-no-540-agforce-queensland-initial-sub-redacted.pdf>) for a fuller treatment of the communications and connectivity needs and priorities of AgForce's members and the cane, cattle, sheep and wool and grains sectors in the state.

Inquires in relation to this submission should be directed to Ruth Thompson, Policy Director

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Yours faithfully

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Michael Guerin
Chief Executive Officer