
From: Jay Vasani [REDACTED]
Sent: Tuesday, 14 June 2022 12:23 PM
To: Merger Authorisations
Subject: Air Voice Telecom - MA1000021 – Telstra TPG Spectrum Transaction – submission

Dear Sir or Madam,

We refer to the - Telstra and TPG application for merger authorisation for proposed spectrum sharing in regional Australia and we are responding to this under the interested party consultation process.

We are the operators of the company Air Voice Telecom and since June 2012 we have been owning and operating Vodafone branded retail outlets under an exclusive agreement with Vodafone Australia and now TPG Telecom.

Air Voice Telecom currently has 33 Vodafone stores under management, we employ 135 staff in total and 10 of our stores are in regional towns. Our first regional store we took over was in Bunbury a regional town some 2 hours' drive south of Perth which we proudly provided great value, advice and excellent service to the local community for a period of over 8 years. Unfortunately, we were forced to close this store in 2021 for commercial reasons but importantly the lack of continuous Vodafone mobile network coverage in the regional area surrounding the store was a major determining factor.

Other stores we operate in regional locations are – Cairns, Townsville and Toowoomba in QLD, Charlestown, Glendale, Kotara and Maitland in regional NSW, Casuarina in NT and Mandurah in WA. We have stores in tourist hot spot locations like Surfers Paradise QLD and Hobart in Tasmania where we provide professional service and advice to many customers who tell our staff about their holiday and travel plans including travel to regional locations. In our Hobart store we have had many occasions where potential customers have decided not to join Vodafone due to their plans to travel to the east coast of Tasmania where Vodafone coverage is known to be not very strong.

Air Voice Telecom has seen the impact that patchy regional coverage can have on people's lives and day to day business. We have spent over 3 years investing in 2 regional stores located in Kalgoorlie in WA and Caloundra on the Sunshine Coast in QLD. Despite our best efforts in running these stores professionally and providing excellent service and advice to our customers, the Vodafone mobile network coverage surrounding these areas was not adequate to provide continuous mobile coverage to customers who travel extensively between regional towns and inevitably we forced to close these stores for commercial reasons.

We are passionate regional store operators and we care about the people in the local communities surrounding our stores. We actively engage with the local community through our stores and with other local initiatives and sponsorships. We are also a regional employer who invests in developing the personal skills and capability of our staff through on-going training and development. We proudly contribute to the local economy by operating our regional stores and through our staff who reside locally, we have on many occasions financially and professionally supported our employees to relocate from a capital city to a regional town to take a role at one of our stores.

For almost 10 years now Air Voice Telecom has invested heavily in supporting the regional towns where our stores are located and our plans are to continue with this level of support.

We are in full support of this proposal put forward by Telstra and TPG for the following reasons –

- We believe in giving regional Australian's the same Mobile Communications benefits that people in capital cities enjoy
- Mobile communication on a smartphone is essential for every Australian today and obtaining sufficient mobile coverage where a consumer works and plays should be fairly and reasonably available to everyone and not based on price and affordability
- Many potential customers come to our regional store locations for advice or service and to obtain a saving or better deal than they currently have. On so many occasions our staff cannot meet the needs of these customers due to the Vodafone coverage footprint in the regional area not comprehensively covering their location. Customers are forced to leave our store feeling disappointed as they can't get the coverage they need and don't get the Vodafone pricing that they want
- Network coverage is a key consideration for all customers during the mobile service buying process. This proposal will see Vodafone customers in regional locations benefit from this proposal
- Continuous coverage when travelling between regional towns is a necessity now purely for security reasons and customers expect this. Even more important for regional areas, customers travelling or visiting family and friends
- It's not fair that budget conscious or budget restricted customers who can't afford other providers can't get continuous coverage and this is a deal breaker for many senior and vulnerable or new arrival international migrant customers
- This proposal will make next generation 5G network speeds, reliability and coverage more accessible and more affordable for more Australians in more regional towns and provide social and economic benefits to residents and travellers
- This proposal will help to increase competition amongst mobile network operators particularly in regional areas by increasing choice for customers, provide customers with a credible alternative to the market leader by offering a comparable network coverage service nationwide but on the Vodafone network
- On many occasions in our stores, we have seen evidence of loyal customers who have been with Vodafone for some time who then move to a new house in the same region. The Vodafone coverage at their new residence is not adequate and they reluctantly move to an alternative provider and most of the time for a higher price

If you would like any further information, please don't hesitate to contact me.

Thanks

Jay Vasani

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