
From: Jay Vasani [REDACTED]
Sent: Friday, 14 October 2022 10:31 PM
To: Merger Authorisations
Subject: Air Voice Telecom : MA1000021 – submission

Dear Sir or Madam,

We refer to the – Telstra and TPG application for a merger authorisation, for the proposed spectrum sharing arrangement in regional Australia.

We are responding to this proposal under the interested party consultation process and this is our second submission.

We are the operators of the registered company Air Voice Telecom and since June 2012 we have been the owners and operators of Vodafone branded retail outlets under an exclusive agreement with Vodafone Australia and now TPG Telecom. Air Voice Telecom currently has 33 Vodafone branded retail stores under exclusive management and we employ 135 staff in total with 10 of our stores being located in regional townships.

There are many tangible benefits to be derived from supporting this proposed arrangement, most notably giving access to a fast 5G network operating in regional areas that is an affordable alternative to the current operators in the market. Fast, reliable and always available mobile connectivity in regional areas is now more important than ever before and must be accessible to all Australian consumers regardless of what their budget and financial situation is. Reliable mobile connectivity should not be something available only to the privileged who can afford it, today this is an absolute necessity for all consumers. As consumers, so much of our daily lives now rely on having easy access to consistent and reliable mobile connectivity. Without this being available to all customers regardless of what their monthly budget for mobile communications is puts many Australian customers in a position of weakness and disadvantage and this is something that must be considered.

So much of our daily lives as consumers today revolves around information being readily available to absolutely everyone and this includes regional customers who in the past have not been able to access this privilege due to budgetary constraints. Historically mobile network infrastructure in regional areas have been less substantial than in metropolitan areas and supporting this proposal will help to provide better coverage to more regional customers overall. Having access to fast and reliable mobile coverage for all regional customers regardless of their budget is absolutely essential and should not be a privilege due to their own personal budgetary constraints.

By supporting this proposal, customers in regional and remote areas will gain immediate benefits like real choice as just like in the urban areas there are many customers who are limited by the monthly budget they have to spend on their mobile communications needs. We have seen firsthand in our regional store locations the power of choice that consumers have, but this choice is weakened and limited when all three mobile networks being offered to customers are not equal when it comes to coverage and quality. Customers in regional areas also tend to have a lower budget to spend on their monthly mobile communications needs and this places them in a disadvantaged position, many who need and seek better quality mobile coverage simply cannot afford it. Supporting this proposal will help to close this affordability gap and offer real choice to absolutely all regional customers.

The higher level and more impactful economic benefits that can be achieved by supporting this proposal include real growth in the regional economy overall for all segments of the communities. By supporting this proposal the local communities in each area will realise true benefits such as more local jobs being secured and new local jobs being created as this proposal drives a higher level of

competition in each local market. We have seen evidence of what true competition creates in a community and this means more choice for consumers, a higher level of customer service, more face to face interaction and more opportunities for economic growth in a regional community.

In essence this also means a higher level of customer service being provided by each store and operator because if the mobile networks deliver a very similar performance then mobile retail stores will need to provide a higher level of customer service to compete for new business and to differentiate in each local market. This puts the purchasing power back into the hands of the customer instead of being offered no choice other than being forced to join the market leader. Today this is a real life customer scenario, many customers are forced to join a particular network due to what level of network coverage is offered by each operator. This is not fostering a market with true competition amongst operators and customers end up being dissatisfied due to the fact that some customers really have no choice and are forced to join a particular operator based on their coverage footprint, this is not true and genuine choice for customers.

By supporting this proposal and increasing the level of genuine competition in regional areas, all consumers and communities in these areas will realise serious benefits that make a difference to their daily lives and the regional economy overall.

If this proposal is not supported then we will continue to see less and lower competition in the market, a genuine lack of choice for many customers and many disappointed local residents who will continue to be forced to take the only option that works for their individual circumstances overall, this is not a fair proposition for many regional residents.

Best Regards

Jay Vasani

Thanks

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