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14 June 2022

Australian Competition & Consumer Commission Online Submission

Via Email: mergerauthorisations@accc.gov.au

Dear ACCC.

BGEA Submission: MA1000021 – Telstra TPG Spectrum Transaction

The Bunbury Geographe Economic Alliance (BGEA) welcomes the opportunity to comment on the TPG/Telstra Multi Operator Core Network (MOCN) proposal.

BGEA is a strategic partnership between the local governments of the City of Bunbury, Shires of Capel, Dardanup and Harvey, and significant local companies operating in the resources sector, timber processing, construction, engineering, water supply, consulting, education and training, accounting and finance sectors.

BGEA comprises community and business leadership and has been advocating for sustainable economic development in our Region for nearly two decades.

Like many Regions in Australia, mobile coverage within Bunbury Geographe is still highly variable and data services inadequate in many situations. This has significant impacts on our residents and businesses who are unable to access services for health and safety, finance, education, business systems and remote work. This places our businesses at a competitive disadvantage and often limits our Region's ability to attract new investment through expansion or attraction of new industries.

The MOCN proposal is a common-sense approach to improve mobile coverage and data services in our Region and we strongly support this agreement. As is often the case in Regional areas, the cost of installing new infrastructure and data capacity is uneconomic when the population or customer base is relatively small. In this case the MOCN proposal makes the best use of existing infrastructure that Telstra has, combined with access to TPG's spectrum which provides more bandwidth and ultimately an improved mobile network service. With Telstra proposing to share their radio network with TPG, this will also provide TPG customers with a much-improved mobile coverage in our Region. As both providers' services will be improved under this Agreement, we are confident that market choice and competition will also be maintained.

I thank you for the opportunity to comment. Should you wish to discuss BGEA's submission in further detail, please do not hesitate to contact me on 0478 406 097.

Yours sincerely

Brant Edwards
Chief Executive Officer
Bunbury Geographe Economic Alliance

