



14 June 2022

Manager - Community Consultations  
Australian Competition & Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

Via email [mergerauthorisations@accc.gov.au](mailto:mergerauthorisations@accc.gov.au)

Dear Australian Competition and Consumer Commission,

## Telstra Corporation Limited and TPG Telecom Limited proposed spectrum sharing

Charles Sturt is Australia's largest regional university, with more than 43,000 students and approximately 2,000 full time equivalent staff. We are a unique multi-campus institution based in some of New South Wales' most vibrant regional communities. The University has campuses in Albury-Wodonga, Bathurst, Dubbo, Goulburn, Orange, Port Macquarie and Wagga Wagga, all with strong connections to surrounding rural and remote communities.

Charles Sturt has a long and proud history in meeting the education, training, and research needs of regional students, communities, and employers, and the University Strategy 2030 continues this tradition with clear goals for students, research, and the wider community.

The digital divide between urban and regional/rural Australia is part of the lived experience of many of Charles Sturt's students and staff living in regional and rural areas. Regional, rural and remote users need reliable communications services so they can have access to remote education in these areas.

The University is able to achieve strong graduate outcomes due to a strong focus on teaching quality including the ability to deliver high quality online learning. More than 75% of the University's graduates go on to work in regional areas, showing we have a pivotal role in meeting regional workforce needs. Their skills will be more important than ever to sustain the large economy growth in regional Australia and conductivity is a key factor in continuing to deliver these outcomes.

As one of Australia's leading online University providers, Charles Sturt sees many benefits to the proposed Telstra Corporation Limited and TPG Telecom Limited spectrum sharing including;

- Greater coverage for regional and rural students wanting to study at University.
- Increased coverage for staff delivering educational training and research in regional and rural areas.
- Increased choice for staff and students living in regional and rural Australia, this extends also to more choice in new innovative products and services.

As an anchor institution in regional Australia, Charles Sturt undertakes research in a range of disciplines, much of it aligned to the needs of regional communities and industries. Australian Research Council evaluations of research at Charles Sturt has shown our research to be high quality, high impact, and highly engaged with industry and the community. One of the key areas of focus includes Agricultural research to support our nations growth.

We understand that Australian farmers are innovative and adaptive. To maintain Australia's global competitiveness in agriculture, the sector needs to embrace AgTech. Charles Sturt plays a critical role as a trusted institution to the farm gate of the adaption of new technologies. The Government's commitment to lift the value of Australian agriculture to \$100 billion by 2030 will not be met without widespread adoption of

digital agriculture. The Bureau of Communications, Arts and Regional Research (BCARR) estimates that the additional economic benefit from digital technologies could be between \$3.0 and \$10.6 billion per year for the agricultural sector by 2029–30. Charles Sturt is supportive of initiatives that increase conductivity, innovation and adoption for Australian farmers and has a positive impact on our agricultural research.

Should you require any further information please don't hesitate to contact me.

Kind regards,



**Samantha Beresford**

Acting Strategic Advisor Government Relations and Regional Engagement  
Charles Sturt University

