



13th October 2022

By email to: mergerauthorisations@acc.gov.au

Dear ACCC,

Connected Farm Pty Ltd submission to ACCC Statement of Preliminary Views: Telstra Corporation Limited and TPG Telecom Limited Application for merger authorisation MA1000021

“TPG Telecom and Telstra Proposed MOCN arrangements”

Connected Farms is a licensed telecommunications carrier, working exclusively to connect and enable digital agriculture in rural and remote Australia. We have first-hand experience in the lack of viable digital connectivity options for rural and remote Australia, indeed our business model is built around enabling digital agriculture in these under-served markets.

Connected Farms is of the firm view that the proposed Telstra – TPG Telecom MCON arrangements will directly benefit connectivity choice and options for consumers in regional Australia and will also have a positive impact on competition in regional Australia.

Currently Telstra is the dominant provider and our experience of working in telecommunications within the agriculture sector and farming communities is that these consumers are very familiar with the lack of alternatives and lack of choice. However, a true MOCN arrangement will not only introduce competition in the form of TPG Telecom to the population of regional Australia it will also allow users from more urban areas who travel to regional areas to choose an alternative. Increasing domestic tourism means that more consumers are faced with a dominant network when travelling in the regions so these users will also benefit from a MOCN arrangement.

We know of many companies that are based in the main urban areas (Brisbane, Sydney, Melbourne etc) who do business with customers in regional areas. Currently this means that they effectively have to choose Telstra (or a MVNO that uses Telstra’s network) for their corporate phone and data plans. Clearly the ability to choose TPG Telecom (or a MVNO that uses TPG Telecom’s network) will increase competition for business users as well.

In agriculture specifically, and in regional Australia generally, there exists a growing demand for data connectivity. Industries such as farming are becoming more data driven as are mines and combined with the migration to regional areas (“tree changers”) there are considerable numbers of people working from home in regional areas. This growing demand in data use and bandwidth will increase the demand capacity of spectrum that is used by Telstra which will in time lead to congestion and slower speeds for consumers (and the anecdotal evidence is that this is occurring in some areas already). It is our understanding that the MOCN arrangement will see the spectrum of both TPG Telecom and Telstra pooled over the MOCN network – this will be a considerable and almost immediate benefit of the proposal. The importance of this spectrum amalgamation in the MOCN environment should not be underestimated – it alone would arguably be a strong argument to justify the arrangement proceeding.

Connected Farms considers there are a number of other key benefits that will be brought to the farm sector, such as in the area of agricultural internet of things (IoT). By TPG Telecom being part of





the MOCN solution their NB-IoT footprint will increase, which for agriculture will mean one of their brands (Vodafone) will be able to expand their sector offerings to the growing Australian agricultural IoT market and bring strong competition in where it is needed.

As a regional company ourselves, Connected Farms considers that the proposed MOCN arrangements between TPG Telecom and Telstra is one of the most important developments in telecommunications infrastructure competition in many years. The proposal is exciting for regional telecommunications as it will simultaneously increase competition where there is currently none or very little and increase bandwidth to ensure regional Australian consumers and businesses get better services.

Yours faithfully,



Tom Andrews

C.E.O

Connected Farms

