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**From:** John Mitchell [REDACTED]  
**Sent:** Monday, 13 June 2022 3:19 PM  
**To:** Merger Authorisations  
**Subject:** Gippsland Regional Executive Forum - MA 100021- Telstra TPG Spectrum Transaction - Submission



The General Manager,  
Merger Investigations  
ACCC  
Canberra ACT 2601

Dear Sir,

The Regional Executive Forum (REF) was initiated by The Champions of The Bush (CoTB). Champions of The Bush is a group of businesses and organisations that operate proudly in regional Australia. Established in 2002, its members are both “champions” in their own right, and committed to championing the cause of regional and rural Australia.

We share a common concern that the key contributions made by regional and rural Australia to the wealth and production of our nation is undervalued. The CoTB aim to address this issue by pursuing strategies that protect and promote the interests of regional Australians. The establishment of the Regional Executive Forum is one such strategy.

The Gippsland Regional Executive Forum (GREF) is one of the REF’s established by the CoTB in 2010. Currently the GREF has twenty two (22) members, with each member representing one industry sector; therefore GREF represents a diverse regional industry perspective. One of the aims of the Gippsland forum is to advocate for industry throughout the region and views reliable and fast connectivity as a priority to ensure the future economic growth, liveability and wellbeing of the region. Gippsland is a dispersed region with a large number of community centres and varied industries predominantly based around natural resources and commodities including agriculture, forestry, dairy and pastoral industries, aquaculture, fishing, energy production, oil and gas extraction and processing, and supported by growing tourism, health and service sectors.

During the past year the GREF supported and undertook advocacy for five (5) priority projects for Gippsland which have the potential to contribute a further \$2b to Gippsland’s Gross Regional Product (GRP) over the next 10 + years. All existing enterprises and these proposed investment projects rely on choice of provider and stable, reliable and quality telecommunications services

The five key investment projects are :

1. Latrobe Aquaculture Development – Stage 1 investment \$125 M : Project owner - Opal – Government Funding Assistance recently provided
2. Trusted Provenance & Traceability Token- Investment \$2.5M : Project owner – Gippsland Food & Fibre- Government Funding Assistance recently provided
3. Gippsland Agribusiness Resilience Hub- Investment \$4.75 M : Project Owner – Gippsland Food & Fibre- Government Funding Assistance recently provided
4. Gippsland Regional Organics Expansion- Stages 1 & 2 Investment \$17.5 M – Project Owner - Gippsland Water
5. Gippsland Logistic Precinct – Stages 2 & 3 Investment \$18.5 M – Project Owner – Latrobe City Council

Food & Fibre in Gippsland is estimated to contribute \$7B of Gippsland’s \$16 B Gross Domestic Product . Gippsland farmers are seeking to be innovative and adaptive , and to meet this challenge the sector needs to embrace digital agriculture . The food & fibre sector and indeed all regional businesses sectors depend on choice of provider and stable, reliable and quality telecommunications services to optimise outcomes . The Telstra – TPG spectrum transaction will improve the service quality and reliability , and is therefore strongly supported.

With business development and a rapidly increasing population digital connectivity is a key infrastructure requirement to enable Gippsland to optimise business growth, productivity and liveability outcomes. Regional and rural users require reliable communications services to facilitate remote access to health, education, banking, technical services and employment which urban residents can access physically and/or more easily.

GRAF is aware that the proposed Telstra-TPG Multi-operator Core Network infrastructure sharing will benefit regional and rural service provision . This proposal will provide mutual benefit by the sharing of existing infrastructure ; GRAF note that TPG has spectrum which is underutilised or unused ; Telstra already has the existing infrastructure which can use that TPG spectrum to improve coverage for existing customers , and new TPG customers resulting in an improvement in the quality of service. TPG will be able to build its own 4G and 5G products , offer its own pricing and support its own customers as if the network was owned by TPG. This will in effect increase choice in many regional and rural areas by providing a choice of three networks.

GRAF therefore is supportive of the Telstra/TPG MOCN Merger as it will provide more choice and quality of service in regional and rural areas, including Gippsland . GRAF further submit that the likely public benefit from the proposed arrangement outweighs any likely public detriment.

Kind regards,

John Mitchell  
Chair,  
Gippsland Regional Executive Program

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