

10th June 2022

Dear ACCC,

Submission for Telstra and TPG application for merger authorisation for proposed spectrum sharing in regional Australia – interested party consultation

Infrastructure Logic Pty Ltd (trading as OneWiFi & Infrastructure), a licensed telecommunications carrier, supports the principle of telecom infrastructure and network sharing in Australia in general. As a Neutral Host carrier, we agree that active network sharing is the most efficient use of private and public funds to provide mobile network coverage at the lowest cost.

We believe the future of mobile network deployments, and Federal and State Government blackspot investment initiatives, should better leverage shared network principles, specifically **active network sharing under a Neutral Host model**. The Neutral Host model will deliver **competitive mobile and connectivity services on an equitable basis to the Australian consumer, by aligning the interest and incentives of all relevant stakeholders**.

The Neutral Host model economics and environmental benefits is not only limited to regional and remote Australia, but also **apply to urban, suburban, and in-building environments**, where there are considerations beyond cost, such as visual aesthetics, infrastructure harmonisation, smart city developments, productivity, end-user choice, and reduction in carbon footprint.

OneWiFi & Infrastructure has already been engaged by the Department of Regional New South Wales (DRNSW) as the **Multi-Operator-Radio-Access-Network (MORAN) work stream lead (MNIP – Mobile Network infrastructure Provider) on the NSW Mobile Active Sharing Program**. OneWiFi was selected as the lead to deliver an active network sharing model for regional and remote areas of NSW, to better address mobile blackspots, and close the digital divide. We are also working with other State agencies, Local Government, Mobile Network Operators, industry associations, and the property sector on various active Neutral Hosting and infrastructure harmonisation initiatives.

Sincerely,



Mevan Jayatilleke
Managing Director
ONEWIFI & INFRASTRUCTURE