

Our Reference: DLA:DLA
Your Reference: MA1000021
Contact Name: Donna Ausling
Bill Birch

Australian Competition & Consumer Commission (ACCC)

Via email: mergerauthorisations@acc.gov.au

Monday, 14 June 2022

Re: Narrabri Shire Council - MA1000021 – Telstra TPG Spectrum Transaction – Submission

Dear Sir/Madam

Thank you for the opportunity to provide feedback in relation to the proposed agreement with TPG to provide access to Telstra's 4G and 5G radio access network in certain regional and urban fringe areas under a Multi-operator Core Network (MOCN) arrangement. Council's comments in this regard are provided herewith:

1. Local Context

Narrabri Shire is a local government area in the North West Slopes region of NSW. The primary settlement of Narrabri is located adjacent to the Namoi River and at the confluence of the Newell and Kamilaroi Highways. The local government area (LGA) is strategically positioned halfway between Sydney and Brisbane, and is considered to be resource-rich. Key local industries include mining and agriculture. At the last census (2016) the resident population was 13,084 persons.

Narrabri Shire Council's vision is articulated in the Community Strategic Plan as follows:

"Narrabri Shire will be a strong and vibrant regional growth centre providing a quality living environment for the entire Shire community."

Narrabri has been recently announced as a special activation precinct (SAP) location. The master planning process for Narrabri is currently underway by NSW DPIE. Through the SAP process it is anticipated that energy-intensive industries and manufacturers, such as plastics, fertilisers and construction material producers will be able to confidently set up in Narrabri with access to commercial quantities of domestic market gas, enabled by the Narrabri Gas Project.

The precinct will also leverage key infrastructure such as the Inland Rail, the Narrabri West Walgett Railway line and the proposed Narrabri Industrial and Logistics Hub to give investors access to global supply chains and markets.

Further information in relation to the Narrabri SAP is available via:

<https://www.nsw.gov.au/snowy-hydro-legacy-fund/special-activation-precincts/narrabri>



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2. COVID-19 Insights

The COVID-19 pandemic has provided a range of opportunities and constraints. These are summarised for the information of the ACCC as follows:

- The pandemic continues to create widespread concern and economic hardship for rural and regional communities. Many companies, businesses and local government organisations already have business continuity plans (BCPs) in place, but these frequently do not address the fast-moving and unknown variables of an outbreak like COVID-19. Typical contingency plans are intended to ensure operational effectiveness following events such as natural disasters, cyber incidents and power outages, for example. Until recently, they have not taken into account the widespread quarantines, extended school closures, and additional travel restrictions that may occur in the case of a global health emergency. The movement of the community into working from home has created unprecedented stress on an already inadequate infrastructure network. It should be noted that Narrabri is serviced by a single telecommunications tower which experiencing reduced bandwidth availability, and decreased reliability evident on a daily basis. Consequently, further urgent investment is needed in such infrastructure to cater for the current sustained and future demand.
- Remote work, online education and social distancing has created unprecedented demand for products and services delivered by the tech industry.
- Support to innovative businesses most affected by the pandemic should be strengthened with the view of appropriately safeguarding competitive markets.
- Working from home has allowed for more flexible work arrangements and increased diversity, which has theoretically enabled the delivery and improvement of services such as telehealth and greater involvement of those with care responsibilities and located within rural/regional areas.

3. Service reliability and impacts

A range of barriers continue to exist in regional communities such as Narrabri in respect of increasing use of digital technologies and overall service reliability. These barriers and respective challenges are summarised herewith:

- Ongoing cost disparities between regional/rural areas continues. In regional and rural areas it remains very expensive to access telecommunications services. Any change to the current model to improve affordability and access is supported
- Lack of reliability of telecommunications services, generally.
- Reliability of telecommunications during emergency events remains a significant concern.
- Mobile coverage remains sporadic within our Region, and a number of blackspots affecting smaller population settlements remain.

- Council generally supports the proposal as it has the potential to provide substantially improved network coverage to both the community and travellers to the Region through another provider, being TPG/Telstra.
- The community has continued to express their frustration in navigating a very complex system of information over several service providers as part of their individual decision-making processes. Access to information also frequently relies on sporadic and unreliable internet access for supporting guidelines, collateral and dissemination channels.
- There are a range of service providers that can potentially benefit from the proposal. These include, but are not limited to:
 - TAFE NSW
 - Country Universities Centre
 - Local Chambers of Commerce
 - Research Centres
 - Community Colleges
 - Local libraries
 - Visitor Information Centres
- The recent adverse weather events impacting our Shire, with extreme drought, flooding and most recently a mouse plague, has highlighted the importance of telecommunications technologies in both developing and maintaining community resilience.

4. Support Opportunities

- Our Region is a nationally significant agricultural producer. Given the ongoing limitations on data access and telecommunications coverage, our Producers are inhibited from accessing and implementing new technology, particularly within the Agribusiness sphere. These barriers ultimately result in a stymying of economic development and social growth opportunities. The availability of improved download speeds, reliability and reduction in cost would increase application and uptake exponentially.

I trust that the above submission provides the necessary assistance for the ACCCs decision making. Should you require any additional information in this regard you are invited to contact the undersigned or Manager of Economic Development, Mr Bill Birch on [REDACTED] or by emailing council@narrabri.nsw.gov.au.

Yours faithfully,



Donna Ausling
Director Planning & Strategy