



QUEENSLAND FARMERS' FEDERATION

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**Re: Multi-Operator Core Network (MOCN) deal between Telstra and TPG
Response to ACCC's Statement of Preliminary Views: MOCN**

Submitted by email to: mergerauthorisations@acc.gov.au

To Whom it May Concern

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland. It is a federation that represents the interests of 21 peak state and national agriculture industry organisations and engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- EastAUSmilk (formerly QDO)
- Australian Cane Farmers Association (ACFA)
- Turf Queensland
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd
- Eton Irrigation Scheme Ltd
- Pork Queensland Inc
- Tropical Carbon Farming Innovation Hub
- Queensland Oyster Growers Association (QOGA)
- Lockyer Water Users Forum (LWUF)

QFF welcomes the opportunity to provide comment on the preliminary views of the ACCC regarding the MOCN proposal. QFF submits that the MOCN proposal will deliver benefits to regional Queensland and the agricultural industry including better service quality for existing Telstra customers, an improved TPG service, and additional choice for regional customers generally. QFF submits that the immediate benefits that will be realised in regional Queensland require a greater weighting than any potential longer term detriments to competition, particularly as these risks are largely unknown at this point.





Advancements in telecommunications and connectivity have provided many opportunities for regional communities and the agricultural sector in recent years. To enable Queensland agriculture and all businesses based in the regions to continue to build on these opportunities and remain competitive, this digital connectivity not only needs to continue to grow, but it needs to grow quickly.

With the accelerating advancement of a wide range of technology advancements touching on all aspects of how we do business agriculture, adequate connectivity has become necessary to be able to operate business as usual and is imperative if the agricultural sector is to be able to make further productivity, efficiency and overall business improvements in the future.

Digital connectivity touches on so many aspects of operating an agricultural business today from supply chain communication, data collection, traceability, crop and animal health monitoring right through to environmental management, input control and the ability to attract and retain a skilled workforce.

QFF understands that the ACCC is thinking about the risks of potential long-term impacts on infrastructure-based competition and is concerned as to how Optus may respond to competition from Telstra and TPG on the MOCN by either increasing its investment plans or withdrawing its future investment plans. QFF submits that it is hard to predict whether Optus' longer-term responses may be beneficial or detrimental and therefore supports moving forward with MOCN which is a known factor in terms of delivering benefits to customers and industry across regional Queensland. QFF submits that the immediate benefits that would come from this proposal going ahead, outweigh speculation of future risks which are at this point largely unknown.

Without significant improvements in connectivity in the short and medium term, the future economic and social viability of regional, remote and rural communities will be held back and current blocks to technology uptake in agricultural sector will continue. The agricultural sector and regional Queensland need immediate improvements to connectivity to continue its trajectory to a digitally enabled industry.

This recent article penned by the Agtech and Logistics hub in Queensland Farmer Today, highlights the way in which agriculture is heading and the critical role digital connectivity will play as farming moves towards an automated future Farming [Farming towards an automated future \(agtechlogisticshub.com.au\)](https://agtechlogisticshub.com.au)

The very real challenges of expanding the extent and depth of telecommunications coverage across regional Queensland and Australia is acknowledge and recognised. There is no one answer to this challenge, but solutions will rather come in collaboration, co-investment, partnership opportunities and technology advancements. The MOCN proposal shows that the market is mobilising to deliver solutions and will provide an important step forward for industry and community in building better coverage.

Thank you for the opportunity to make comment on this important matter. I look forward to your favourable consideration of QFF's submission.

Yours Sincerely



Jo Sheppard
Chief Executive Officer