Regional Development Australia
GRAMPIANS

16 May 2023

Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601
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Dear Sir/Madam

Submission to the report on preliminary findings 'Regional mobile infrastructure inquiry 2022-23' by Regional Development Australia (RDA) Grampians

RDA Grampians supports mandatory mobile roaming in regional areas and continues to advocate for improved mobile telecommunications performance for people in regional Australia.

In this submission we will respond specifically to the report on preliminary findings from the ACCC.

Preliminary Finding 27: *Temporary mobile roaming is technically feasible although there are question of complexity, risk and cost that will need to be further considered against alternative solutions.*

Emergency mobile roaming provides significant safety benefits to regional residents and visitors.

RDA Grampians commends the Australian Competition and Consumer Commission (ACCC) for reversing its previous opposition to mobile roaming, finding it was "technically feasible" to allow temporary access to the phone signals of rival providers, so residents and tourists can make phone calls and check emergency apps in the event of nature disaster like fire or flood.

The issue of emergency alert roaming was raised in the Royal Commission into Natural Disasters hearing. During the 2019/20 bushfires regional residents and visitors' ability to contact their families and access emergency apps and alerts was limited to the network range of their mobile provider. This issue has only been highlighted by this recent flooding in the eastern States. Alerts, general information, and personal messages about disasters are increasingly communicated using a mix of voice, text, and online applications that rely on mobile broadband.

These events have highlighted the importance of mobile telecommunications for both survival and recovery in extreme situations. High quality mobile coverage is critical in providing access for 000 calls and emergency alerts during catastrophic events.

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What is highlighted, is the gap in service availability and quality between metropolitan and regional Australia. The extent that indigenous communities are more isolated and outside of existing mobile coverage, signifies the necessity of mobile roaming.

Often, individuals who are out of coverage of their mobile network operator (MNO) are within coverage of another MNO. Allowing individuals to roam to the strongest signal at any location would increase access to crucial information and provide depth and reliability of mobile communications in emergency situations.

Regional communities rely on mobile telecommunications for day-to-day communications, and the rise of cashless payment and "cloud" based business services makes reliable fixed and mobile telecommunications essential to regional businesses. We would encourage the ACCC to take their findings a step further and recommend permanent roaming for regional business and families who struggling with poor mobile phone reception, and get inferior mobile coverage compared to visiting international tourists who have access to share the mobile phone towers of different providers.

The May 2023 announcement by the Federal Government to fund a national alert system where people will be sent urgent text alerts in the event of fire, floods and emergency regardless of which MNO they are with, is a good initiative but it does not go far enough.

The national alert system is a one-way message, leaving people without the ability to access weather and emergency apps or contact loved ones to say they are ok or where they are going.

Similarly, Apple launched a feature for iPhone 14 owners that allows people to connect to emergency services using satellite when cellular and Wi-Fi coverage is not available. This is a strong emergency feature for a small group of mobile users, but does not address the day to day lack of connectivity that regional Australians currently experience.

Preliminary Finding 28: *There are changes required to support systems and business processes to enable temporary mobile roaming.*

Mobile roaming exists in Australia and is not a new concept for telecommunication companies. There are existing support systems and business processes enable mobile roaming.

International visitors can use their international mobile device in Australia by roaming across all major telecommunication provider network towers. The call and data traffic international visitors generate roams over all cellular networks. It is feasible.

Optus, Telstra and TPG Telecom have all committed to improve the provision of mobile coverage information to consumers and businesses. They committed to discussing with each other measures to improve comparability of coverage and quality of different networks. The Australian Mobile

Telecommunications Association (AMTA) advised the ACCC that it would work with its members to improve coverage map comparability and develop a co-building process for greenfield sites. Limited progress has been made. Given the lack of progress on this task, we recommend that the ACCC expedite these efforts, potentially under its telecommunications record-keeping or other information gathering powers.

Preliminary Finding 29: *The associated time and costs expected with temporary mobile roaming will depend on the scale and scope of the temporary mobile roaming and the level of technical and operational difficulty required in implementing such a capability across the mobile network operators.*

The lives and safety of regional Victorians are worth the "time and costs expected with temporary mobile roaming". Mobile roaming can mean the difference between life and death in an emergency or natural disaster.

Emergency roaming across all three mobile networks would be instrumental to emergency personnel, who are frontline in times of disaster, to improve awareness of emerging threats which help them protect residents, visitors in the area, and themselves. Emergency service personnel commonly use public mobile communications to complement specialised communications devices. Improving the extent and quality of coverage will improve service coverage, depth, and quality as devices would be able to roam to the strongest network in any given location in emergency situations.

Government-funded telecommunications infrastructure should be open access as a matter of principle, as all taxpayers have contributed to it.

RDA Grampians calls on the major telecommunication companies to take a community focused approach with the safety of all Australians, regardless of where they live, at the core of its decisions around mobile roaming. We want telecommunications providers to work together for the sake of rural residents, to enable emergency mobile roaming.

Kind regards

Stuart Benjamin
Chair

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