

WALKERVILLE RATEPAYERS AND RESIDENTS ASSOCIATION INC.

Registered Number: A31312T

Hon. President: Paul Katsieris Hon. Treasurer: Irene Irvine Hon. Secretary: Anne Terrell

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16.06.2022

Australian Consumer and Competition Commission (ACCC)

via email: mergerauthorisations@acc.gov.au

Dear Sir or Madam,

MA1000021 – Telstra TPG Spectrum Transaction – submission

I write on behalf of the Walkerville Ratepayers and Resident's Association (WRRRA); a volunteer, organisation representing the community of Walkerville in South Gippsland, Victoria. Walkerville is the southern-most, permanently settled community on the entire Australian mainland.

The residents of Walkerville are amongst the 15% of Australians who live in small regional towns. The population of Walkerville, including its popular caravan park, reaches a maximum of about one thousand during the summer holiday season.

Up until now, Walkerville has depended for its mobile telecommunication services upon remote access to towers either to the east across Waratah Bay near Sandy Point or to the west, even more remotely, at Tarwin Lower. Such remote access generally only support 3G level signals from towers capable of providing 4G or 5G signals at closer ranges. We are very pleased that Telstra has recently won a federal Regional Telecommunications grant to make possible a new mobile telecommunications tower within the Walkerville precinct.

In the past, that would only have been good news for Telstra customers. Those with Optus or Vodafone mobiles currently get negligible signals at Walkerville. This leads to major inconvenience for residents and visitors.

For example, a local ratepayer, Dr Peter Gerrand, writes:

“During major storms in 2020, a flying tree branch caused significant damage to the roof of our holiday house in Walkerville, causing dangerous damp mould damage within the house. During the pandemic lockdowns in 2020 and 2021, my wife and I were constrained to our home in Melbourne. We had to co-ordinate all the repair work to the Walkerville house by phone from Melbourne.

“To our consternation, we could not communicate with some of the tradesmen while they were working on the house, because their mobile phones were with Optus. To contact us they had to drive 25 minutes away to Tarwin Lower where there is an Optus tower. If they had been Vodafone customers, they would have had to drive 45 minutes to either Foster or Inverloch.”

“The failure to communicate increased the time taken to get the repairs done, and potentially the cost of the repairs.”

Under the new agreement between Telstra and Vodafone, it will be possible for Vodafone customers to get Telstra-level signals for the first time in Walkerville, initially at 4G and later at 5G. Not only will that provide competition in mobile services in Walkerville, it will also provide competition in broadband services between the two mobile operators and the NBN satellite service.

Under the new arrangement, the mobile customers of Optus will initially miss out. But surely, it will be possible for Optus to negotiate a similar infrastructure sharing arrangement with Telstra.

The benefits of the Telstra–Vodafone agreement for competition in regional areas of Australia, such as in the Walkerville area, will be so significant that it would be a great disservice by the competition regulator to veto this arrangement while waiting for an ideal three–party agreement to emerge.

As in so many areas of life, holding out for the perfect can indeed be the enemy of the good.

Please do not hesitate to contact the undersigned if you would like further information or have any questions.

Yours Faithfully,



Paul Katsieris
Hon. President
Walkerville Ratepayers and Residents Association Inc.