

FROM THE DESK OF

## Trevor Long

28 June 2022

**ACCC**

Re: Telstra Corporation Limited and TPG Telecom Limited proposed spectrum sharing

Authorisation Number: MA1000021-1

By Email to: [mergerauthorisations@acc.gov.au](mailto:mergerauthorisations@acc.gov.au)

To whom it may concern,

With apologies for my late submission, I appreciate you excepting this submission from me today.

I've been a follower of the mobile industry for well over a decade now, and a user of the mobile networks since 1994, both rural regional and metropolitan.

The other important thing that I do regularly in my role as a technology commentator, and someone who takes talkback radio calls from people and speaks to listeners live on my podcast is talk to average consumers about the deals that are available and the plans that are available, and their choices in the market.

The most common thing I hear from people is that their only option for a mobile plan is Telstra because of their coverage. And it's unquestioned; The Telstra coverage in the most remote and regional areas of Australia is the most comprehensive - no one challenges that. The fact that Optus and Vodafone through TPG offer outstanding coverage in huge parts of the country that would serve almost all customers is lost on most people because of those few areas where just Telstra will do the job.

So when you speak to customers in regional Australia they are almost always rusted on to Telstra because of that simple question of coverage - or perceived coverage.

It's my view that this network sharing agreement will be positive for all Australians. Most importantly it will be a huge deal for regional Australia who could save hundreds of dollars a year but using a different carrier on the TPG network but still get advantage of the Telstra coverage broadly in regional Australia.

For example, a customer in Grong Grong NSW, on the cheapest \$58 per month SIM only plan with Telstra, will get unlimited calls and texts, and 40GB of mobile data.

That same customer, should this deal go through, would have the option of using Kogan Mobile, an MVNO (Mobile Virtual Network Operator) on the TPG Network, and pay just \$25 per month for 45GB of data along with unlimited calls and texts. That's a saving of \$396 per year to that single consumer.

If there are 8 million Australians living outside the capital cities - in "regional Australia" - that's a potential saving of over \$3 billion. A simplistic, crazy calculation I grant you that, but it demonstrates the POTENTIAL for competition that comes from a deal like this.

What Australian's need is competition, they need companies gunning for their business, at the low end and the high end of the ARPU (Average Revenue Per User) scale.

Right now, there is no perceived competition, While all three Telcos, Telstra, Optus and TPG have extensive Networks, and frankly the coverage Optus and TPG offer in some places is better than that of Telstra - for people in regional Australia, the perception is there is only one choice.

Allowing this kind of network sharing will mean Aussies have choice, not just to switch Telcos, but to save money - lots of it.

I have great respect for the investment Telstra has made into Mobile coverage in Rural Australia, but it can't be lost on us all that it was done because it was required, then it continued because it was a network advantage competitively.

Likewise, the investment Optus and Vodafone (now TPG) has made across Australia is exhaustive, but - if not for Federal Government initiatives all three Telcos would still have vast blackspots across the country.

So a lack of investment isn't going to be the outcome of this network sharing, because there is already a lack of investment - the creation of a Federal Government blackspot program proves that. In fact, approval for this deal would serve to boost the confidence in the Telstra regional network and ensure its continued investment and upkeep by Telstra due to their (assumed) additional revenue.

As someone who has switched telcos no less than four times in the last two years, and is currently on the Vodafone Network, with my family on the TPG MVNO network, I'd like to think families right across Australia could get the same deals as those in the city who don't see Telstra as their only option.

Competition is exactly what is created with this network sharing arrangement. Competition in rural and regional Australia. Time to save them some money.

Sincerely yours,



Trevor Long