21 March 2018

Rod Sims
Chairman
Australian Competition and Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

By email: Rod.Sims@ACCC.gov.au

Dear Mr Sims,



We would like to thank the ACCC for inviting AMTA and its members to the forum on mobile regional issues held 28 February.

Following the forum, AMTA members have agreed that it would be useful for industry to adopt a proactive approach on two of the issues arising:

- 1. coverage maps improvement and comparability; and
- 2. developing an agreed industry view on how a co-building process for greenfield sites could work.

In relation to the first issue, our intention is to facilitate discussion among the mobile carriers in relation to the technical issues involved in improving the comparability of coverage maps. We look forward to sharing the outcomes of this discussion with the ACCC.

And in relation to the second issue, as you are aware, AMTA also manages the Mobile Carrier Forum (MCF) that established a framework for both co-location and co-building among its members more than 20 years ago. As a result of TPG joining the MCF program, we are currently reviewing the MCF framework and underlying contractual agreements including site share information and we believe that this provides us with an opportunity to look at both co-building and co-location processes and see how they can be improved and updated.

We also believe it would be informative to draw on our recent experience from the Regional Rail Connectivity Project in Victoria.

Finally, as the ACCC forum also highlighted that consumers and agriculture business owners are often unaware of legal and available ways of improving reception, we are also undertaking a review of AMTA's consumer information so that it can be revised and shared with the appropriate consumer groups.

We look forward to engaging with the ACCC in relation to its review of the Facilities Access Code and specifically hope to bring to that engagement an agreed industry view around potential co-building processes.

Yours sincerely,

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**Chris Althaus** 

AMTA CEO