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HEART OF THE CHANNEL COUNTRY

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Mr Rod Sims  
Chairman  
Australian Competition and Consumer Commission  
GPO Box 3131 CANBERRA ACT 2601

Dear Mr Sims and Enquiry Members,

**Australian Competition and Consumer Commission**  
**Domestic Mobile Roaming Declaration Inquiry – Draft Decision**

Please accept this submission on behalf of Barcoo Shire Council in response to the Australian Competition and Consumer Commission (ACCC), 5 May 2017 Draft Decision with regards to the Domestic Mobile Roaming Declaration Inquiry.

Barcoo Shire Council was very pleased to be notified of the ACCC draft decision in relation to its enquiry into the mandating of domestic mobile roaming between Australia's mobile phone carriers' mobile base station infrastructure, which was released for public comment on 5 May 2017.

In this instance, our council completely agrees and supports the ACCC in its findings as included in the detailed published report on the draft decision. Council is confident that this report into the draft decision was compiled without bias, is as a result of the content of the many submissions received, has taken into consideration the comprehensive market and industry research obtained, and is reliant on the rigorous discussions of the ACCC committee – which transparently supports final draft decision from the enquiry.

As our council outlined in its original submission to the enquiry, that there is a huge risk to many aspects of the current market structure and forecast capital investment if domestic roaming was mandated. A decision to allow domestic roaming could completely jeopardise any future investment in network and mobile infrastructure expansion into the regional and remote areas. It also has the potential to affect regional employment and having telecommunications technicians located in regional areas, and could seriously damage the market capitalisation and value of Telstra as the company holding the largest mobile coverage area across Australia.

Barcoo Shire Council also has a view that the Australian Government has to provide an environment that enables companies to confidently invest in the vast regions of Australia without the fear of the rules changing and the creation of uncertainty.



Our council also believes that even though there is in many cases little or no competition in regional and remote Australia, that as there is national pricing across the telecommunications carriers in the mobile market, these consumers interests are protected in this area.

In reading many of the submissions posted on the ACCC website, it appears that there is considerable national support for the status quo, and it should remain in relation to domestic mobile roaming.

Being a very remote local government, our council is of the opinion that a modern and multi technology telecommunications industry needs regulation and policy. But that regulation should always be considered in conjunction with the needs of an all inclusive Australian telecommunications market and the current levels of investment by telecommunications carriers.

The rapidly moving telecommunications industry and the ever expanding voice and data networks and platforms could, in some instances, be used to provide some of the Australian Government's universal service obligations.

The advancement in these mobile networks, and the many new technologies being developed, if thought about in a practical and innovative way, could give telecommunications opportunities that do not currently exist in many parts of our nation.

In closing, Barcoo Shire Council would like to thank the ACCC for enabling the opinions of the Australian public to be heard in this matter, and we sincerely encourage and hope that the ACCC upholds and defends its draft decision, to not mandate domestic mobile roaming in Australia.

Your sincerely,

Bruce Scott OAM  
Mayor  
Barcoo Shire Council