



Murrumbidgee COUNCIL

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The Secretariat
ACCC Domestic Mobile Roaming Declaration Inquiry 2016

Response to the Draft Decision by the ACCC

I refer to the submission from Murrumbidgee Council dated 30th November regarding the domestic mobile roaming declaration inquiry, wherein Council provided its views on the relevant issues.

Council welcomes the draft findings of the of the Inquiry released on the 5th May proposing to not declare a domestic mobile roaming service, and also further reiterates our concerns regarding mobile coverage in regional areas.

As outlined in our submission, Murrumbidgee Council is located in the Murrumbidgee Valley area of New South Wales and the absence of effective mobile coverage has been an issue of concern for some time. Whilst coverage in our urban areas is adequate, many parts of our rural and remote areas have little to no coverage including many hundreds of kilometres of the Sturt Highway, Newell Highway and Kidman Way. This can be potentially dangerous in the events such as flood, bushfire, accident or storm emergencies.

Council supports the draft decision to not declare a domestic mobile roaming service, as there was a perception that declaration would in fact reduce investment in regional mobile networks. In addition, Council supports the two findings below as they are relevant to our region:

1. That mandated roaming would most likely remove the competitive environment & incentive for mobile carriers to invest in new coverage & new technology upgrades into regional areas into the future
2. That mandated roaming may result in price rises for consumers as mobile operators pass on the costs they will incur for using roaming services

Currently Telstra has the most network coverage in our region and it is unrealistic to expect other MNO's to significantly increase their coverage. It is Council's view that should domestic roaming be declared that Telstra would lose its competitive advantage and thus have no further incentive to continue to expand its network coverage into regional areas.

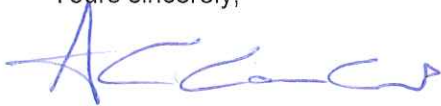
Council would also support any measures to reduce the cost of deploying and improving mobile networks through continuing initiatives such as the "Mobile Black Spots Program" and "Facilities Access Regime".

In summary whilst some elements of declaring a domestic mobile roaming service may have some benefits to customer choice in some geographic areas, it is perceived that this will be to the detriment of regional Australia due to reduced investment in infrastructure.

I attach a copy of Council's submission dated 30 November in support of this submission.

Council urges the ACCC to confirm its draft findings for the reasons outlined above.

Yours sincerely,



Andrew Crakanthorp
Deputy General Manager