



Grahame O'Leary
Director
Regional Mobile Infrastructure Inquiry
Mobiles, Transmission and Consumer Branch
Australian Competition and Consumer Commission
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Regional mobile infrastructure inquiry 2022-23

Dear Mr O'Leary

The NSW Small Business Commissioner (the Commission) is an independent statutory office of the NSW Government. It provides strategic advice, advocacy and affordable dispute resolution services across NSW.

The Commission's role includes:

- encouraging government agencies and larger businesses to enter productive working relationships with small businesses
- facilitating and encouraging the fair treatment of small businesses
- promoting a fair operating environment in which small businesses can flourish.

The Commission agrees the availability and reliability of telecommunications services is critical to ensuring the safety of communities during emergencies and natural disasters. Challenges faced over the past few years, including floods, bushfires and COVID-19, have highlighted the need for small businesses in regional, rural and remote NSW to have access to fast, reliable and equitable telecommunication infrastructure and services.

While service interruptions due to natural disasters are unavoidable, the Commission would note there are unique issues faced by small businesses which limit their ability to start the recovery process, including:

- Accessing up to date information about the disaster zone.
- Inability to progress insurance claims, which are often processed over the phone.
- Inability to communicate with clients and perform day to day business operations.

Regional telecommunications also provide important channels for small businesses to access new markets, stay connected and deliver services. Small businesses have indicated to the Commission, including through survey responses, that regional telecommunication services currently do not meet their businesses' expectations and needs due to issues with the accessibility, performance and reliability of mobile and internet services. It is reported that this makes it difficult to conduct business in a consistent and reliable manner.

Poor telecommunications infrastructure and services in regional, rural and remote NSW has meant that many small businesses have to incur additional costs in order to obtain a level of service consistent with their businesses' expectations and needs. This may include investing in additional infrastructure, upgrades or back up technologies. The Commission notes that issues of affordability are compounded by regional small businesses incurring additional costs (to upgrade or pay for additional telecommunications services), which exacerbates the inequity of services delivered to regional areas.

The Commission welcomes any initiatives to provide and improve telecommunication access during natural disasters and emergencies, as well as improvements to regional telecommunications more broadly.

Thank you for the opportunity to make a submission. If you require further information, please contact Megan Bennett at either megan.bennett@smallbusiness.nsw.gov.au or (02) 9372 8767.

Yours sincerely

Chris Lamont
Commissioner
NSW Small Business Commission

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