

ACCC Mobile Roaming Inquiry
mobileroaminginquiry@accg.gov.au

To Whom It May Concern

Re: ACCC Domestic Mobile Roaming Inquiry

As a Member representing a regional electorate with rugged terrain and regular severe and unpredictable weather events, I consider reliable telecommunications services an issue of utmost importance. I am an advocate for expanding mobile coverage, improving capacity and speed within the existing coverage footprint, and properly maintaining existing infrastructure to ensure reliability. I am concerned that the introduction of regulated mobile roaming would remove the incentive for carriers to meet these three objectives.

Telstra claims, as a major element of its mobile marketing strategy, to have the largest network of all Australia mobile network operators (MNOs), covering about 2.4 million km² and 99.3 per cent of Australia's population. With such significant coverage already in place, remaining coverage black spots tend to be economically marginal candidates for improvement, with significant Commonwealth and state subsidies supporting much of the network expansion in regional Australia in recent years.

Were other MNOs given access to Telstra's network through a regulated roaming arrangement, Telstra's commercial point of difference would be eliminated and the commercial incentive to invest in coverage improvements or upgrades for marginal or uneconomic sites would be diluted or removed.

I am also concerned that the introduction of roaming would reduce the commercial imperative to maintain, repair, and upgrade uncommercial or marginal infrastructure. If the marketing advantage of a larger network were annulled by a regulated roaming arrangement, Telstra would have little incentive to maintain sites that are commercially marginal (unless the declared roaming rates were very high, in which case I suspect roaming would not be feasible for other MNOs and the status quo would remain, albeit with added regulatory uncertainty).

I note that the current Facilities Access Code permits MNOs to co-locate their own equipment on another network operator's transmission site, so each MNO already has a regulated pathway to expand their regional coverage at their own cost.

P.O. Box 2056, Coffs Harbour NSW 2450
39 Little Street, Coffs Harbour NSW 2450

Toll Free 1300 301 793 Ph 02 6652 6233 Fax 02 6651 4346

luke.hartsuyker.mp@aph.gov.au | www.lukehartsuyker.com.au



Proponents of roaming argue that consumers would benefit from greater choice if regulated roaming was introduced. In my experience as an MP, I receive many more complaints about mobile coverage and quality than I do about lack of choice. Roaming is likely to exacerbate the existing complaints of most mobile telephone users, not address their concerns.

In summary, I believe the introduction of regulated roaming would have a negative impact on telecommunications services in Cowper.

Thank you for considering this submission.

Yours sincerely

A handwritten signature in black ink, appearing to be 'L. Hartsuyker', written in a cursive style.

HON LUKE HARTSUYKER MP