Good Afternoon

Please see below a submission to the ACCC in relation to the Mobile Roaming Regulation Enquiry on behalf of Yorke Peninsula Council region and our local communities who may be negatively impacted if this suggestion proceeds.

The suggestion in relation to regulation of mobile roaming within Australia will severely negatively impact regional users over time.

Mobile network operators do not take a segment of their network (say for example the Yorke Peninsula region) to potential customers for sale, they present the entirety of their national network as a demonstration of being a superior provider.

Mobile network providers who have invested in the future of the network particularly in regional areas should not be disadvantaged for their proactive approach to service provision, nor should they be negatively affected or in fact penalised for that investment in regional communities.

Currently the market considers whole of network coverage as a major differentiator between networks. This in turn encourages the networks to continue to expand into areas that will never see a return on investment from data traffic or users revenue covered by a single tower in regional Australia. We believe that by removing this differentiator ~~two~~ three things will be achieved.

1.      Short term benefit to users as mobile prices are driven down.

2.      Long term stagnation of network growth, possibly approaching zero without government subsidies.

3.      Long term reduction in technological innovation in this space.

As evidence to this view we have a parallel example.

After the NBN was announced there was a dramatic reduction in the money invested into improving traditional telephone exchanges in regional Australia. This has led to the stagnation of the technology to the point where regional prices and speeds for broadband internet and associated services are an order of magnitude slower and more expensive that metropolitan pricing. Fortunately the investment was made in mobile networks over this time to the extent that they provide speeds over 10 times faster than the copper network in areas that the NBN has not been rolled out, and unlike services delivered over copper prices are not dictated by geolocation. Additionally where the NBN exists these mobile services have bandwidth parity with the services currently provided by NBN.

It would not be unreasonable to propose the nationalisation of mobile networks if mobile roaming were to be introduced, as the only growth and innovation on the mobile networks outside of capital city CBDs would be as a result of government funding. Regional areas, who rely heavily on decent connectivity, will once again be disadvantaged.  Considering currently on Yorke Peninsula we already experience lack of service connectivity across several areas, this change will further disconnect regional Australia from what the CBD expects and sometimes takes for granted.

Kind Regards

**Jackie Reddaway  I** Executive Assistant to the Chief Executive Officer and Mayor

Yorke Peninsula Council **I** Principal Office - Maitland  
Ph: 08 – 8832 0000 **I** F: 08-8853 2494  
[REDACTED] **I** W: [www.yorke.sa.gov.au](http://www.yorke.sa.gov.au/) 

[](http://www.lga.sa.gov.au/councilrates)