



QUEENSLAND FARMERS' FEDERATION

Primary Producers House, Level 3, 183 North Quay, Brisbane QLD 4000
PO Box 12009 George Street, Brisbane QLD 4003
qfarmers@qff.org.au | (07) 3837 4720
ABN 44 055 764 488

Submission

5 June 2017

Mr Rod Sims
Chairman
Australian Competition and Consumer Commission
Level 35, The Tower
360 Elizabeth Street
MELBOURNE VIC 3000

Via email: mobileroaminginquiry@acc.gov.au

Dear Chairman

Re: ACCC domestic mobile roaming declaration inquiry – draft decision (May 2017)

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of peak state and national industry organisations, which in turn collectively represent more than 13,000 primary producers across Queensland. QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland primary producers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland
- Queensland Chicken Growers Association
- Queensland Dairyfarmers' Organisation
- Burdekin River Irrigation Area Irrigators
- Central Downs Irrigators Ltd
- Bundaberg Regional Irrigators Group
- Flower Association
- Pioneer Valley Water Cooperative Ltd
- Pork Queensland Inc.
- Queensland Chicken Meat Council
- Queensland United Egg Producers
- Australian Organic.

QFF welcomes the opportunity to comment on the Australian Competition and Consumer Commission's (ACCC) draft decision for the domestic mobile roaming declaration inquiry. QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

The united voice of intensive agriculture





On 5 May 2017, the ACCC released its draft decision for the domestic mobile roaming declaration inquiry. In the draft decision, the ACCC proposes to not declare a domestic mobile roaming service. QFF considers that the ACCC has made the right decision not to mandate roaming between mobile operators.

In regional, rural and remote areas of Queensland, competition is generally secondary to coverage due to the current level of telecommunications services across the state. In parts of the country where this is the case, providing coverage should be the priority over competition.

Coverage cannot be extended without investment. The ACCC found that while roaming would eliminate the differences in coverage between operators, these differences are a significant factor in driving competition between mobile network operators, leading to the best investment outcomes.

The ACCC concluded that competition in the mobile market is reasonably effective and that consumers in regional, rural and remote areas benefit from national competition by getting access to the same plans as consumers in the cities. The ACCC also determined that regulated roaming could mean price increases for customers and harm competitive investment incentives.

There is also a risk that regulated roaming could impact the effectiveness of the Mobile Black Spot Program (MBSP), which is critical for extending mobile coverage beyond commercial reality. Regulated roaming would likely make it less viable for mobile operators to compete for MBSP contracts, resulting in less coverage per dollar of government investment, which may also influence future government decisions about the program.

Yours sincerely

Travis Tobin
Chief Executive Officer