26D168

11 November 2026

Australian Competition and Consumer Commission

Mobile Services Inquiry 2026–27

By Email: telco.regulation@accc.gov.au

Dear Commissioners,

Re: Submission to the Mobile Services Inquiry – Domestic Roaming and Radio Access Network Services

The South Australian Dairyfarmers' Association (SADA) welcomes the opportunity to provide a submission to the Australian Competition and Consumer Commission's Mobile Services Inquiry.

SADA represents dairy farmers across South Australia and advocates for policies that support a productive, sustainable and resilient dairy industry. Reliable mobile connectivity is increasingly essential to the operation of modern dairy farms, regional businesses and rural communities.

SADA supports the objective of improving mobile coverage, reliability, affordability and consumer choice across regional and remote Australia. However, we believe regulatory interventions must be carefully considered to ensure they deliver meaningful improvements without undermining the investment required to expand and maintain telecommunications infrastructure.

SADA recognises the importance of maintaining investment incentives, strengthening regional network infrastructure and pursuing practical, targeted solutions to connectivity challenges.

SADA does not see mandated domestic roaming as the primary means of improving regional connectivity. We encourage the ACCC to prioritise policies that facilitate new infrastructure, strengthen existing networks and support commercially sustainable investment.

Importance of mobile connectivity to South Australian dairy farmers

Mobile connectivity is no longer a convenience for regional businesses. It is an essential component of agricultural productivity, safety, business management and community participation.

South Australian dairy farmers increasingly rely on digital technology to manage farm operations, including automated milking systems, livestock monitoring, irrigation, machinery, environmental management, business administration and communication with processors, suppliers and service providers.

Reliable mobile coverage is important for:

- Supporting farm management systems and connected agricultural technologies.
- Maintaining communication between farm workers, contractors and management.
- Accessing weather information, market updates and agricultural advice.
- Managing supply chains, deliveries and interactions with dairy processors.
- Supporting emergency communications and worker safety.
- Accessing government services, banking, health services and education.
- Enabling regional businesses and communities to participate in the digital economy.

South Australian Dairyfarmers' Association Inc

U5 780 – 802 South Road, Glandore SA 5037

Ph: 8293 2399 Fax: 8293 8886 Email: sada@sada.asn.au

ABN: 70 250 523 225

Connectivity limitations can create operational inefficiencies, increase business costs and affect the ability of farmers to adopt new technologies.

For dairy businesses operating in regional and remote areas, unreliable connectivity can also present practical safety concerns, particularly when workers are operating machinery, undertaking livestock activities or working across large properties.

SADA emphasises that connectivity must be assessed not only in terms of population coverage, but also in terms of the ability of regional businesses to operate reliably across farms, agricultural properties and rural transport routes.

Regional connectivity requires sustained infrastructure investment

SADA recognises the scale and complexity as well as the significant investment required in delivering mobile infrastructure across regional and remote Australia.

In many regional locations, the commercial returns associated with building and maintaining mobile infrastructure are considerably more challenging than in metropolitan areas.

Government co-investment programs, including the Mobile Black Spot Program and Regional Connectivity Program, have played an important role in supporting infrastructure deployment where commercial investment alone may not be viable.

SADA believes these programs should continue to be supported and strengthened.

Regulatory settings should encourage telecommunications providers to invest in new infrastructure, improve capacity, maintain existing sites and adopt emerging technologies.

The ACCC should carefully consider whether mandated access arrangements could reduce the commercial incentives that currently encourage providers to invest in extending and improving their networks.

Concerns regarding mandated domestic roaming

SADA recognises the appeal of allowing customers to access another provider's network when their own provider does not have coverage. Mandated domestic roaming does not however address the underlying connectivity challenges faced by regional communities as it only provides access to existing infrastructure. It does not necessarily result in new towers, extended coverage or the elimination of mobile blackspots. In some instances it may indeed work against this investment.

SADA believes investment in new infrastructure and coverage extension should remain the priority.

Regional mobile networks often serve large geographic areas with relatively limited infrastructure. SADA is concerned that adding customers from other providers to existing networks may increase demand on infrastructure that is already approaching capacity constraints, potentially affecting service quality, reliability and performance for existing customers.

For farmers and regional businesses relying on mobile connectivity for daily operations, any deterioration in network performance would be counterproductive.

SADA supports the principle that telecommunications providers should retain appropriate incentives to invest in network expansion and improvements. The ACCC should carefully assess the long-term investment implications of any proposed declaration before making a decision.

Alternative policy approaches supported by SADA

SADA believes the ACCC should consider a broader range of policy options to improve regional connectivity.

We support the following measures outlined in Telstra's submission.

Strengthen regional infrastructure investment programs

Government co-investment should continue to support new mobile sites, network upgrades and infrastructure improvements in areas where commercial investment alone is unlikely to deliver adequate coverage.

Future funding programs should be flexible and place-based, allowing investment to address the specific needs of regional communities.

This should include consideration of:

- Agricultural production areas.
- Regional transport corridors.
- Areas with significant mobile coverage gaps.
- Locations experiencing capacity constraints.
- Areas requiring improved network resilience.

Streamline infrastructure deployment and repair

SADA supports targeted, risk-based reforms to reduce unnecessary delays in building, upgrading and repairing telecommunications infrastructure.

Faster approvals for network maintenance, emergency repairs and temporary infrastructure could improve resilience and reduce disruption to regional communities.

These reforms should retain appropriate environmental, cultural heritage and community protections.

Support network resilience and emergency communications

Reliable mobile connectivity is particularly important during bushfires, severe weather events and other emergencies.

SADA supports investment in:

- Backup power systems.
- Network hardening.
- Redundancy and resilience.
- Temporary mobile infrastructure during disasters.
- Improved satellite-based communications.
- Faster restoration of services following outages.

South Australian dairy farms and regional communities must be able to communicate during emergencies, particularly where alternative communications options are limited.

Improve access to satellite and coverage-extension technologies

Emerging satellite-to-mobile services and approved network extension devices provide opportunities to improve connectivity in areas where traditional infrastructure is difficult or expensive to deploy.

SADA supports consideration of targeted assistance for regional households, agricultural businesses and isolated communities to access appropriate connectivity technologies.

These initiatives should complement, rather than replace, investment in terrestrial mobile infrastructure.

Support appropriate spectrum policy

SADA supports a long-term spectrum strategy that recognises the importance of regional coverage, capacity and affordability.

Spectrum policy should encourage efficient network deployment and ensure regional connectivity outcomes are appropriately considered in allocation and regulatory decisions.

Competition, affordability and regional equity

SADA recognises the importance of competition in delivering affordable services and meaningful choice for consumers. However, competition policy should consider the long-term interests of regional consumers, including the sustainability of network investment.

The availability of multiple retail providers does not necessarily improve connectivity where underlying infrastructure is limited or absent. For regional communities, meaningful competition must be supported by infrastructure capable of delivering reliable services.

SADA encourages the ACCC to consider whether regulatory intervention would genuinely improve coverage, service quality and affordability over the long term, rather than simply redistribute access to existing infrastructure.

We also support consideration of targeted affordability measures, including assistance for low-income households and regional consumers to access appropriate fixed, mobile and satellite services.

Recommendations

SADA recommendations are to:

1. Prioritise infrastructure investment as the primary means of improving regional mobile coverage and connectivity.
2. Carefully assess the potential long-term impacts of mandated domestic roaming on telecommunications investment incentives.
3. Support continued government co-investment in regional telecommunications infrastructure through flexible, place-based programs.
4. Encourage commercially negotiated network-sharing and roaming arrangements where they deliver mutually beneficial outcomes.
5. Support streamlined, risk-based approvals for telecommunications infrastructure deployment, upgrades and emergency repairs.
6. Encourage investment in network resilience, backup power, redundancy and emergency communications.
7. Support targeted access to satellite services and network extension technologies for isolated regional communities and businesses.
8. Ensure spectrum policy supports regional coverage, capacity and affordability.

9. Consider the specific connectivity requirements of agricultural businesses, including dairy farms, when assessing regional consumer outcomes.

Conclusion

SADA strongly supports the objective of improving mobile connectivity across regional and remote Australia.

Reliable telecommunications infrastructure is essential to the productivity, safety, resilience and future sustainability of South Australian dairy farming businesses and regional communities.

However, we believe the best long-term outcomes will be achieved through policies that encourage new infrastructure investment, strengthen existing networks and support commercially sustainable solutions.

SADA supports the key principles outlined in Telstra's submission and encourages the ACCC to carefully consider the potential unintended consequences of mandated domestic roaming and RAN sharing.

We believe a combination of government co-investment, targeted infrastructure programs, streamlined deployment processes, improved network resilience and emerging technologies offers a more effective pathway to addressing regional connectivity challenges.

SADA encourages the ACCC to adopt an evidence-based approach that prioritises long-term investment, reliable connectivity and sustainable outcomes for regional Australia.

We appreciate the opportunity to contribute to this inquiry.



Andrew Curtis

CEO