ACCC Domestic Roaming Submission

15 December 2016 Media briefing Vodafone Chief Strategy Officer Dan Lloyd

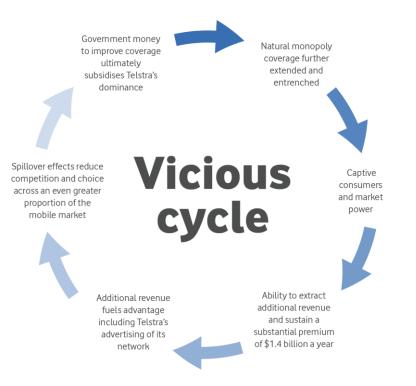
The ACCC is considering three key issues:

- 1. Would a domestic roaming declaration promote competition?
- 2. Would a domestic roaming declaration achieve any-to-any connectivity?
- **3**. Would a domestic roaming declaration promote efficient investment and use of infrastructure?

Our key points:

- 1. Australia is uniquely susceptible to natural monopoly
- 2. Telstra's mobile monopoly has been entrenched by subsidies
- **3**. Telstra's market power spills beyond the natural monopoly footprint
- 4. Uniform national pricing places no effective constraint on Telstra
- 5. Telstra is denying the only means by which its rivals can effectively compete
- 6. Telstra would receive a fair price when customers of other operators used its network
- 7. A declaration would restore the abilities of all operators to compete on coverage
- 8. Declaration of domestic roaming would have no adverse impact on investment
- 9. The international experience demonstrates that roaming promotes competition and investment
- **10.** Declaration of roaming will promote competition and consumer choice

Telstra's market dominance is a vicious cycle



0

The government and industry subsidies that are driving the vicious cycle





Vicious cycle costing Australian mobile customers \$1.4 billion per year





Domestic roaming is the answer

- The current situation will not self-correct
- Australian taxpayers are the biggest investors in regional telecommunications, so it makes sense these networks should be available to all consumers
- Domestic roaming would, for the first time, give customers the choice of provider and benefits of competition
- Telstra would receive a fair price when customers of other operators used its network
- Domestic roaming is the most common regulatory solution in western economies with large land areas and low population densities
- There is no international evidence that domestic roaming reduces investment incentives
- The US, Canada and France saw an uplift in investment by the incumbent and industry overall following regulated roaming
- The cost of building and upgrading mobile networks would be shared between two or more mobile providers

We conclude:

- 1. Differences in geographic coverage are preventing competitive and efficient outcomes
- 2. Declaration will promote competition
- 3. Declaration will achieve any-to-any connectivity
- 4. Declaration will encourage efficient investment and use
- 5. Declaration of roaming is in the long-term interests of end-users

Questions?