

25 May 2021

The Director

Spectrum Access and Management

Department of Infrastructure, Transport, Regional Development and Communications

2 Phillip Law Street ACTON ACT 2601

To whom it may concern,

**Re: 850/900 MHz Auction Allocation Limits Exposure Draft**

The Regional, Rural and Remote Communications Coalition (RRRCC) welcomes the opportunity to provide input into the Department of Infrastructure, Transport, Regional Development and Communications consultation on the 850/900 MHz Auction Allocation Limits Exposure Draft.

The RRRCC is an alliance of 21 volunteer and advocacy organisations with a shared interest in improving telecommunications in the bush. The Coalition was formed in 2016 to raise awareness of the vital role of connectivity for regional, rural and remote Australians and to advocate for continued improvements. RRRCC members, as the on-ground voice of regional Australians, have strong stakes in the decisions made to the communications industry. Find a supporting letter form the Isolated Children’s Parents Association enclosed, highlighting some of the possible impacts to students and families living in rural and remote Australia.

The RRRCC’s advocacy efforts are focused on five high-level goals, under which we

have articulated a number of specific asks. The RRRCC’s five goals are:

1. Guaranteed access to voice and data services.
2. Equitable voice and data services that meet minimum standards and reliability.
3. Continued program to expand mobile coverage.
4. Digital capacity building for regional, rural and remote Australia.
5. Affordable communications services for regional, rural and remote Australia.

Under goal 1, the RRRCC highlight the requirement that wherever Australians work and live, they should have guaranteed minimum access to data and voice services, including services that meet the specific needs of all consumers in regional areas.

The RRRCC recognises the intent of the Australian Competition and Consumer Commission’s (ACCC) recommended allocation limits to promote competition, continuity of services, and deployments of 4G and 5G services. However, it would

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implore the department to consider any unintended consequences that could risk connectivity development in regional, rural and remote Australia.

The RRRCC is not opposed to imposing auction allocation limits. Limits support continuity of services and can promote competitive market outcomes that benefit consumers if allocated fairly. However, when considering regional, rural, and remote connectivity, there are unique difficulties in incentivising investment in telecommunications infrastructure and service improvement in areas with a sparse population and lower return on investments.

**Rural and remote consideration**

The RRRCC is seeking the most efficient allocation of spectrum to best support regional, rural and remote communities and businesses. The RRRCC hold concerns that unnecessary limits have been placed on operators with large rural and remote footprints.

Rural and remote market share needs to be taken it account when allocating spectrum. Beyond the 850 MHz auction split between metropolitan and regional areas, there is no incentive for operators to disperse their awarded spectrum beyond areas with the highest return on investment i.e. urban and regional centres. Indicating that if an operator with low rural and remote investment were to be awarded a large amount of spectrum, it would be extremely unlikely that holding this spectrum alone would provide enough incentive to invest it in new or underdeveloped regional markets.

The 850/900 MHz spectrum is particularly critical for the broader coverage of 4G and 5G. Access to 4G and 5G services is quickly becoming essential for regional, rural and remote businesses to take full advantage of related IOT technologies that will be necessary for those businesses to remain commercially competitive in the local and global markets.

The current auction allocation limits have Telstra, the operator with the most extensive rural and remote coverage and infrastructure investment, ending up with less spectrum for regional areas than before the auction. The ACCC and department must understand and communicate the intended and unintended impacts of this significant change on the quality and certainty of mobile connection in regional communities.

**Assurances for spectrum use**

The allocation process needs to seek assurances from all operators who are allocated spectrum that the spectrum will be promptly used to substantially improve access and quality of services in regional, rural and remote areas. If such assurances are not forthcoming, or the utilisation of the allocated spectrum is not being employed in a reasonable timeframe, then those allocations should be withdrawn and made available to other operators.

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**Competition**

The RRRCC is a strong supporter of competition through the parallel build of the mobile network. However, the Coalition is seeking an outcome of this auction to be an extension of current capabilities and coverage footprint to locations still experiencing poor mobile service. As such, it is important that consideration is given to operators who can leverage existing investments to rapidly improve services well beyond current service boundaries.

The issue of competition in regional, rural and remote Australia is an important one, and the RRRCC is not confident that it can be appropriately addressed through spectrum allocation. Other co-investment programs such as the Mobile Black Spot Program, which have successfully improved the on-ground connectivity for regional, rural and remote communities, are a more targeted and successful method. The RRRCC believe that more could be done to provide regional, rural and remote communities with assurances that they will not be left behind during this spectrum auction.

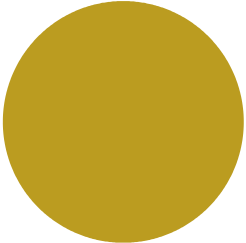
**Closing remarks**

The RRRCC encourages the department to continue considering different methods of improving access to communities on a national scale. In the last five years, we have seen been significant improvement, though there remains a digital divide. New methods of improving access may need to be revisited, such as targeted mobile roaming options. With increased access to spectrum, there is a real risk of duplication of infrastructure that will potentially increase the operational cost to deliver base services and not enhance quality telecommunications services in regional and remote areas. The RRRCC looks forward to remaining in these conversations as they progress.

**The Regional, Rural and Remote Communications Coalition**



Encl.



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The Director

Spectrum Access and Management

Department of Infrastructure, Transport, Regional Development and Communications 2 Phillip Law Street

ACTON ACT 2601

21 May 2021

To whom it may concern,

The Isolated Children’s Parents’ Association of Australia, ICPA (Aust), welcomes the opportunity to provide feedback to the Department of Infrastructure, Transport, Regional Development and Communications consultation on the 850/900 MHz Auction Allocation Limits Exposure Draft.

ICPA (Aust) is a voluntary parent body dedicated to ensuring all geographically isolated students have equity of access to a continuing and appropriate education. This encompasses the education of children from early childhood through to tertiary. The member families of the association reside and work in rural and remote Australia and all share a common goal of achieving access to education for their children and the provision of services required to achieve this.

Many of the families that ICPA (Aust) represents have limited communication services where they live due to geographic isolation. A majority rely heavily on landlines for a voice service and have no mobile coverage at all. A percentage of our member families are able to access limited mobile service with the assistance of antennae and boosters but can only receive the coverage in set positions. While some families living in rural and remote areas who have the Sky Muster satellite internet service are able to utilise options such as Wi-Fi calling, it is currently not an adequate replacement for their main landline service. Internet service for a large number of our members is provided by nbn Sky Muster satellite, with a smaller portion being able to use mobile broadband and even fewer with fixed wireless.

As part of the Regional, Rural and Remote Communications Coalition (RRRCC) we concur with the representative group’s comments regarding the 850/900 MHz Auction Allocation Limits Exposure Draft expressed in their letter to the Department of Infrastructure, Transport, Regional Development and Communications. ICPA (Aust) believes the possible impacts raised by RRRCC may have serious implications for geographically isolated students who require access to reliable, affordable and appropriate communications to ensure they have fair and equitable access to educational opportunities.

Students living in rural and remote areas rely heavily on communication services in order to access their education, however communication types are limited and quality of service is not always optimal. It is essential

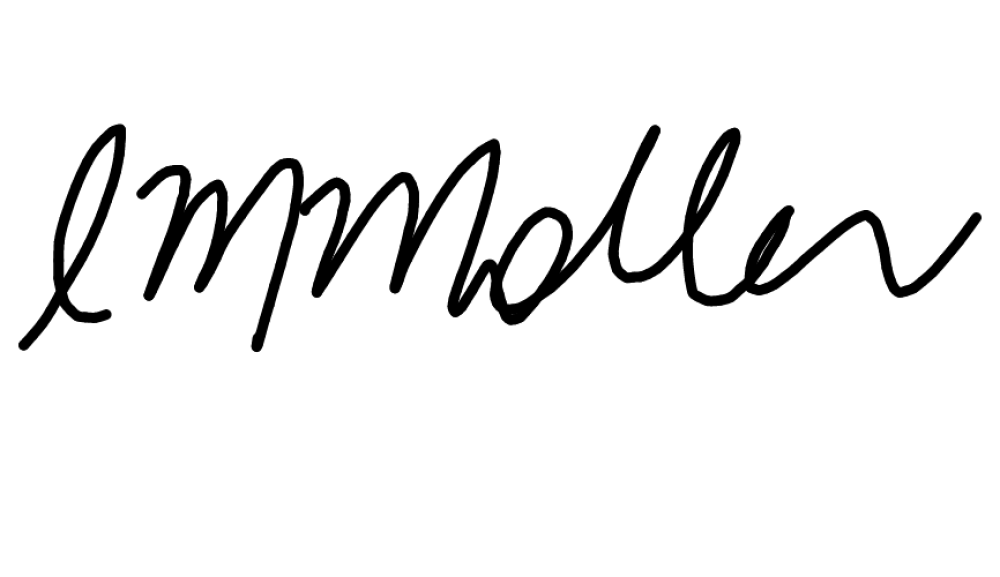
[www.icpa.com.au](http://www.icpa.com.au/) 1

that communication services are maintained, perform reliably and their coverage expanded in rural, remote and very remote regions to enable students to be educated, businesses to operate and for the safety of families in these areas. Prior to any move toward spectrum allocation limitations, assurance is needed that the quantity and quality of services in rural and remote areas will not be diminished as a result of these limitations, particularly with regards to education of children in these areas and the safety of families. At this stage there doesn’t appear to be a requirement for operators to use the spectrum they purchase towards services or to place infrastructure in more remote areas, even though there is a “regional” category for the maximum spectrum that providers may purchase. Locations such as Perth and the Gold Coast are considered “regional” in some rankings, yet the services, number of providers and infrastructure available in these areas is vastly different to those available in more rural and remote areas further away from metropolitan areas. Without adequate safeguards in place there may not be enough incentive for a company to provide services to more remote areas due to smaller consumer numbers. Assurance that service providers will commit to using spectrum and providing required communications infrastructure in rural, remote and very remote areas as part of their spectrum allocation is warranted and should be considered if applying the 850/900 MHz Auction Allocation limits. Providers who are successful bidders on spectrum should be required to provide services in rural and remote areas equal to or better than those currently available.

Limitations on the upcoming spectrum auction should not prevent any mobile carrier from bidding for enough spectrum to grow capacity and enhance their services to meet the future needs of regional, rural and remote customers. ICPA (Aust) believes there should be some guarantee made that providers who already service rural and remote areas and have infrastructure in these areas can continue their commitment in these locations and be supported to continue to operate and extend their services in these areas.

ICPA (Aust) is not opposed to competition between providers in offering communication services, however this must not be done at the detriment of services for those living in rural and remote areas.

One carrier should not be favoured over another in the setting of limitations, as these limits could have unfair consequences on the communication services available to regional and remote families as well as the growth of additional services in future.

Sincerely,

Alana Moller President ICPA (Aust)

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