

The Manager
Spectrum Licensing Policy
Australian Communications and Media Authority
Online submission

Dear Manager

Consultation on the Ministerial Policy Statement – Expiring Spectrum Licences

I am pleased to provide comment to the Australian Communications and Media Authority (ACMA), on behalf of the NSW Government Telecommunications Authority (NSW Telco Authority), to the consultation on the *Radiocommunications (Ministerial Policy Statement – Expiring Spectrum Licences) Instrument 2024* (MPS).

The NSW Telco Authority is constituted by, and functions under, the *Government Telecommunications Act 2018* (NSW) to operate and maintain mission-critical operational communications services for public safety and government agencies within NSW. The NSW Telco Authority holds responsibility for coordinating telecommunications services support during emergencies under the *State Emergency and Rescue Management Act 1989* (NSW), has a central role in coordinating spectrum holdings on behalf of government agencies and manages major digital connectivity programs for the NSW Government.

In relation to the MPS issued with the consultation, the NSW Telco Authority believes that public safety should be awarded a higher priority and we strongly recommend that public safety is included in the MPS as a separate objective.

We are aware that public safety features in 3(b)(ii) of the object of the *Radiocommunication Act 1992* but note that public safety is given little regard in the MPS. It is important to the long-term interests of the Australian public to ensure their safety by supporting public safety communications. The impact of natural disasters on our communities over recent years has demonstrated the importance of public safety communications to keep the people and places of Australia safe. Accordingly, Emergency Services Organisations (ESOs) require adequate spectrum to support their operations.

The current mission critical Land Mobile Radio (LMR) network used by the ESOs in NSW allows state-wide, cross organisational mission critical voice and data communications at low bit rates (e.g., short messages, status messages), based on the Telecommunications Industry Association standard P25. This is critical technology and is relied upon heavily by first responders and those with sanctioned roles in public safety and emergency management. P25 equipment in NSW will reach end of life in 2026 but various P25 components will be required to live on until such a time as Public Safety Mobile Broadband (PSMB) can be relied upon as the primary communication system.

Already, devices and services, such as video communication, drones and robot-controlled devices, are critical components in public safety communications. Uplifting the communication toolkit from mission critical voice communications to mission critical broadband voice and data communication

will see an expansion in operational response capabilities including real time intelligence and evidence gathering, life-saving applications, incident control centre command and direction, and geolocation support.

This capability expansion will also see a safer working environment for first responders and faster, more effectual and safer response for members of the public. To ensure these advancements are available to first responders to a mission critical level, government may be required to step in if the commercial market fails to provide the necessary enablers and services. This could mean ensuring adequate spectrum for an Australian PSMB, in addition to other public safety communications uses.

To this end, the MPS should feature public safety as a separate objective for consideration by the ACMA when deciding upon the most valuable long term public interest for spectrum licences.

For further information, please contact Georgina Gold, A/Director Whole of Government Connectivity Leadership, NSW Telco Authority at georgina.gold@customerservice.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "J. Pickens".

James Pickens
A/Managing Director

09/04/24