



TELSTRA CORPORATION LIMITED

Commonwealth Held Spectrum Consultation Paper

Public submission

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Executive Summary

Telstra welcomes the opportunity to comment on the “*Commonwealth Held Spectrum*” consultation paper. Given increasing demand for spectrum and the importance of the services and capabilities provided through spectrum by the government and the industry at large, there is an obligation on the government as one of the main holders of spectrum to ensure that processes are in place to continually identify and implement efficiency improvements. To this end, we support the three draft proposals as presented in the paper and believe these recommendations are a step in the right direction towards improving the transparency and efficiency of Commonwealth held spectrum and incentivising Commonwealth spectrum holders to participate in spectrum sharing and trading. However, we do have some suggestions about how to further improve the proposals, and these are outlined in our more detailed comments below on the proposals.

01 A strong governance framework

Draft proposal 1

Establish an advisory committee comprising relevant Commonwealth government agencies to provide advice to the Minister for Communications on issues of spectrum policy and identify and implement whole-of-government efficiency improvements that will enhance the management of Commonwealth spectrum holdings.

We support the proposal to establish a ‘Government Spectrum Steering Committee’ (the Committee) to facilitate whole-of-government consideration on issues of spectrum policy and to provide guidance to the Minister for Communications on issues of spectrum policy and management. We believe this is an important step towards improving transparency and ultimately reform of Commonwealth spectrum holdings.

However, in regards to membership of the Committee, we believe it should not be merely limited to representatives of Commonwealth government users of spectrum. We believe engagement with the wider industry is key to ensuring that the Committee has a holistic view of the spectrum management landscape and can provide well informed advice to the Minister. To this end, we suggest that several representatives from the private sector or industry bodies (for example: AMTA or Communications Alliance) be also appointed to the Committee and the associated working group. If membership is not possible, as a bare minimum, we suggest a regular standing invitation to the Committee (e.g.: half yearly) and the subsidiary working group (on an as needed basis) be extended to the industry.

It is encouraging to learn that the Department of Communications and the Arts (the Department) has already commenced a Commonwealth-wide stocktake of the Commonwealth spectrum holdings¹. However, it is not clear from the consultation paper when the Committee will deliver its reform roadmap to the Minister. We suggest that an indicative timeline be provided so the Committee’s delivery of its key objectives are time bound. We are supportive of the proposal to review the work plan, and the necessity for Committee and the working group, after two years.

¹ Commonwealth Held Spectrum consultation paper. P14



02 Improving transparency

Draft proposal 2

The Government should publish a consolidated report outlining the value and use of the Commonwealth's spectrum holdings every two years.

To facilitate this portfolio agencies should provide information on their spectrum holdings by value (price paid) and number of licences; the utilisation-over-time and purposes for which spectrum holdings are used; and future spectrum requirements including the timing of new spectrum allocations.

We are pleased to see the proposal for reporting on the value and use of Commonwealth spectrum holdings every two years. We believe this will improve the transparency of Commonwealth spectrum holdings which will in turn enable more efficient use of spectrum such as identification of excess holdings that could be shared or traded with the wider industry.

We look forward to the upcoming report on the Commonwealth use of spectrum that is currently being prepared by the Department in consultation with the ACMA. However, we would like to suggest that in addition to the requirement for government agencies to provide information on their spectrum holdings by value (price paid) and number of licences, utilisation over time, and purposes/usage, they should also be required to report on geographic extent of usage (i.e. location of sites in use, for each frequency band used).

As acknowledged by the Department in the consultation paper, there are bands in public sector spectrum holdings that have little use and could be of significant interest to the private sector. Two examples of bands in this category, that could be the subject of early review, are summarised below.

- 2700-2900 MHz: While this band is exclusively allocated across the entire continent for aeronautical & meteorological radars, and some off-shore radar beacons, it is only used by a small number (~14 Bureau of Meteorology, ~18 Aeronautical, ~6 Defence) of radar services and most of these are located in the vicinity of major city airports and airbases. Spectrum in this band outside the areas served by the radars, corresponding to large geographic tracts across regional and remote Australia, is lying fallow and unable to be utilised by other spectrum users such as fixed wireless access broadband providers.
- 2900-3100 MHz: Similarly, while this band is exclusively allocated across the entire continent for a few (~30) coastal/off-shore maritime and (3 or 4) meteorological radars, and some off-shore maritime radar beacons (reef markers in coastal waters), it is otherwise lying fallow across the vast majority of the continent. It is again a significant resource that could potentially be brought into use by fixed wireless access broadband providers and other spectrum users.



03 Retaining benefits through sharing and trading of spectrum

Draft proposal 3

The Government should explore the implementation of a whole-of-government approach to the identification of sharing and trading mechanisms, including the examination of foreign government approaches and emerging technologies and processes to determine if there are opportunities for the Government to engage in sharing and trading of Commonwealth held spectrum.

We are supportive of the proposal that Government should explore the applicability of sharing and trading to Commonwealth held spectrum.

We note that this proposal is one of the key deliverables for the Committee supported by research from the Department in consultation with Department of Finance. We look forward to seeing the outcome of this research and engaging with the Department in reviewing the barriers as well as incentives for Commonwealth spectrum holders to share and trade spectrum.