

The Manager
Major Spectrum Allocations Section
Australian Communications and Media Authority

Online submission

Dear Manager

Submission to the Australian Communications and Media Authority – Draft spectrum re-allocation recommendation for the 850/900 MHz band (consultation IFC 14-2020)

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), on the *Draft spectrum re-allocation recommendation for the 850/900 MHz band - consultation paper*, released by the ACMA in May 2020.

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 New South Wales. The 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 several major digital connectivity programs for the State.

New South Wales continues to work with other states, territories and the Commonwealth through the Public Safety Mobile Broadband (PSMB) Senior Officials Committee, established by the Council of Australian Governments, on development of a nationally interoperable PSMB capability.

Central to this work is consideration of the allocation of dedicated spectrum for PSMB nationally, to support the operational communications of law enforcement, public safety and emergency management in the public interest. The Ministerial Council for Police and Emergency Management will progress the spectrum considerations with the Minister for Communications, Cyber Security and the Arts on the allocation for PSMB.

The *Radiocommunications Act 1992* (Cth) includes the object (s 3(b)) to:

'make adequate provision of the spectrum:

- (i) *for use by agencies involved in defence or national security of Australia, law enforcement or the provision of emergency services;...*

The discussion paper notes the 'Government communications policy objectives' for the allocation of the 850/900 MHz band include, 'supporting a national PSMB capability'.

A PSMB capability is critical to the future of operational communications for law enforcement agencies and emergency services organisations, with the adequate provision of dedicated spectrum being key to its delivery.

The Commonwealth previously set-aside 2 x 5 MHz of spectrum for this purpose and the 850 MHz expansion band contains several potential band segments. A decision to allocate spectrum from this band to PSMB will affect the re-allocation decisions for the remaining 850/900 MHz spectrum.

The specific spectrum requirements for PSMB, including quantum and frequency band segment considerations, are still being contemplated in parallel with the establishment of PSMB proof-of-concept trials which will inform implementation of the national PSMB capability.

The need for the accelerated implementation of a PSMB capability was recently reinforced for emergency services organisations during the 2019-2020 bushfire crisis, hence the availability of adequate provision of spectrum for PSMB is high in the national interest.

New South Wales will continue to collaborate with the Commonwealth and other jurisdictions to progress towards achievement of adequate provision of spectrum for PSMB as a priority. The final PSMB spectrum allocation decision will affect the remaining spectrum available for auction.

The discussion paper notes that, subject to further discussion and decisions, the Minister may decide to hold-back 2 x 5 MHz of spectrum in the 850 MHz expansion band from the re-allocation process for the deployment of PSMB. The NSW Telco Authority supports the continuing reservation of this spectrum for PSMB. This would also require the identification of the particular sub-band segment subject to that decision.

Further, as the quantum of dedicated spectrum required for PSMB is not yet confirmed, it is proposed that the PSMB spectrum allocation decision be resolved prior to any further decisions for the allocation of the remaining spectrum in the 850 MHz expansion band.

Should you wish to discuss this submission, please contact Alison Port, Director Engineering and Spectrum, NSW Telco Authority on 02 8522 7447 or email at alison.port@customerservice.nsw.gov.au.

Yours sincerely



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