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Australian Communications and Media Authority
Communications Infrastructure Division
Spectrum Planning and Engineering Branch

By online submission

Submission to *Proposed area-wide apparatus licence – Consultation paper*

Dear Executive Manager

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 *Proposed area-wide apparatus licence – Consultation paper*, released in June 2019.

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 also has a central role in coordinating spectrum holdings on behalf of NSW government agencies.

The NSW Telco Authority is supportive of the establishment of an area-wide licence (AWL) type, which would benefit its business-as-usual network operations and its telecommunications emergency management functions as well as being highly valuable in support of the roll-out of its Critical Communications Enhancement Program (CCEP) across NSW.

The NSW Telco Authority provides the following responses to the specific issues for comment contained in the ACMA consultation paper.

1. *Do you think the proposed characteristics of the AWL type will support your current or intended network deployments? Are there any kinds of deployments that you believe the AWL type should support and currently does not?*

The AWL type would support the operation of the Authority's Mobile Radio Assets (MRA), sometimes referred to as cell-on-wheels or CoW capabilities. MRAs are mobile base stations deployed to support emergency responses and site maintenance activities in locations where a permanent base station is not available. The MRAs use frequencies from the Harmonised Government Spectrum (HGS) in the 400 MHz band.

Under the AWL type, the Authority could deploy multiple MRAs without the need to manage and maintain individual apparatus licences supporting each system. The AWL type could also be used for the deployment of MRAs in locations where an HGS area licence is not available. Therefore, the Authority supports the application of the AWL type for the 400 MHz band.

2. *Which bands and/or geographic areas do you believe would be conducive to the use of an AWL?*

As the Authority's network operates in HGS frequencies in the 400 MHz band, the inclusion of the 400 MHz band in the AWL type would enable public safety and government agencies to benefit from its availability for their operational communications.

The Authority's MRAs may be deployed at any location to support its communications network, hence AWL type coverage across the State would be viewed as valuable to its operations. This coverage requirements could be broken down into regions or smaller geographic areas if required for particular licences.

There could also be occasions when a NSW Telco Authority MRA, for example, might be deployed across the state border within another jurisdiction's HGS area, such as could occur during collaborative inter-jurisdictional bush fire-fighting activities along the border regions. Such issues should be included in the geographic considerations for the AWL type.

3. *What technical and other matters do you believe the ACMA should consider in deciding to use AWL licensing in a particular band?*

Consideration could be given to the authorisation of third-party access to the AWL type. For example, public safety agencies may also independently deploy MRAs to support their operations at particular times. To accommodate these circumstances, it may be efficient to allow these NSW Telco Authority customers access to host-AWLs, held by the Authority, under third-party provisions.

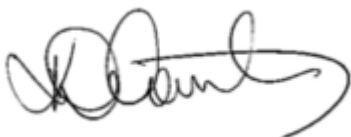
The Authority would be interested in understanding how the operation of the AWL type would compare to area-wide systems operating under the HGS arrangements. For example, specific to the HGS, RALI LM08 (*Frequency Assignment Requirements for the Land Mobile Service*) requires that services operating within 120km of a state/territory border must be aligned with the specified geographic boundary power spectral density limits unless this use is endorsed by the HGS area licensee or, if no HGS area licence exists, by the National Coordinating Committee for Government Radiocommunications (NCCGR) representative in that neighbouring jurisdiction. The Authority is interested as to whether similar endorsement might be required from neighbouring jurisdictions for each AWL licence application.

4. *Do you have any other comments on the AWL concept?*

The NSW Telco Authority is interested in further details about the potential pricing structure of AWL in the 400 MHz band. Noting the pricing of the HGS area licence and that of the area-wide apparatus licences currently required for each channel on MRAs, it would be desirable if the AWL type offered a competitive alternative.

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@customerservie.nsw.gov.au.

Yours sincerely



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