

The Manager, Economics Advisory,
Australian Communications and Media Authority (ACMA)
PO Box 13112 Law Courts MELBOURNE VIC 8010



By email: spectrumpricing@acma.gov.au

27 May 2023

Re: ACMA Consultation Paper—*Proposed changes to apparatus licence pricing structures*

Dear Sir/Madam

AMTA appreciates the opportunity to comment on the proposed changes to apparatus licence pricing structures. We support the ACMA's proposed changes to base annual increases in apparatus licence on population rather than on the consumer price index (CPI). Whereas it is of potential concern that this could lead to excessively high increases in densely populated areas within high- and medium-density areas, we appreciate the ACMA's clarifications and comparisons demonstrating that annual increases in population are on average lower than the CPI.

In providing this brief response, we also wish to be listed as a stakeholder with a view to being notified of future consultations and public release of submissions, especially if a reply-comment period is adopted for this particular consultative process.

In this regard, we are especially interested in monitoring developments regarding the ACMA's proposals around "pricing for varying levels of interference", i.e. reduced pricing for more opportunistic uses of spectrum which may present a reduced interference potential and/or require less stringent levels of protection. We are wary that such initiatives may have the potential—unintended or otherwise—to invite less-compliant users to operate in certain bands, or 'pollute' the spectrum environment in highly-regulated bands facilitating the provision of highly reliable radiocommunications services. That said, we don't oppose the concept in and of itself, so we wish to monitor what kinds of proposals for varying levels of interference are made by respondents to this consultation.

We look forward to continuing engagement with the ACMA on this matter.

Yours sincerely,

A large black rectangular box redacting the signature of Chris Coughlan.

Chris Coughlan
Head of Spectrum and Network Infrastructure
Australian Mobile Telecommunications Association Ltd ([AMTA](#))