

Public submission

12 May 2023

The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority

Online Submission

To the Manager

RE: ACMA Draft five-year spectrum outlook 2023-28 and 2023-24 work program

TPG Telecom Limited (**TPG Telecom**) welcomes the opportunity to comment on the ACMA's draft five-year spectrum outlook 2023-28 and 2023-24 work program (**Draft FYSO**).

TPG Telecom supports the submission of the Australian Mobile Telecommunications Association (**AMTA**) to the Draft FYSO. Rather than repeat every position raised in the AMTA submission, TPG Telecom wishes to highlight certain positions of particular interest to TPG Telecom.

For Australia to maximise the economic and social benefits of mobile connectivity, the telecommunications industry requires significantly more spectrum to cater for exponential consumer demand for mobile data. While the ACMA has made positive progress on the allocation of additional mid-band spectrum in the 3.4-3.8 GHz range, TPG Telecom believes additional Time Division Duplex (**TDD**) mid-band spectrum needs to be made available within this FYSO period.

From TPG Telecom's perspective, the next priority for IMT spectrum after the allocation of 3.4-3.8 GHz spectrum should be to progress the allocation of the top part of the 6 GHz band (ie 6425-7125 MHz) for IMT use. Ideally, mobile network operators (**MNOs**) should be able to put this spectrum 'into use' by 2027 timeframes. TPG Telecom would welcome the ACMA commencing a targeted study on potential incumbency issues in the 6 GHz band in the near term. Beyond 2027, TPG Telecom would support the allocation of additional mid-band TDD spectrum in the 4 GHz band.

In addition to mid-band spectrum, the 600 MHz band offers a compelling opportunity for additional low-band spectrum to be made available for IMT use. Not only will this spectrum be ideal for IMT use in regional Australia, TPG Telecom anticipates additional low-band spectrum would be needed in metropolitan areas for deep indoor coverage, as consumer demand increases over time. Ideally, MNOs would have certainty of access to 600 MHz spectrum towards the end of this FYSO period (i.e. 2027/28).

While the requirement for additional spectrum is primarily driven by consumer demand, the 2027/28 timeframe aligns with the anticipated technology refresh to 6G by the industry. Certainty of spectrum allocations leads to efficient use of spectrum, due to operators being able to adequately prepare for the 6G technology refresh.

If you have any question about this submission, please do not hesitate to contact Stephanie Phan, Acting Head of Industry Strategy TPG Telecom, at [REDACTED]



Yours sincerely



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