



# Submission by Free TV Australia

## **ACMA consultation on satellite direct-to- mobile services: regulatory issues**

January 2024

## 1. Introduction

In the ACMA's Five-year spectrum outlook 2023–28 (FYSO), the Authority provided information on arrangements and potential issues with:

- satellite direct-to-mobile services
- other satellite use of bands without a satellite allocation.

As part of this work, it held an online spectrum tune-up on 31 October 2023, which it followed with a call for submissions.

Among other things, the Authority has invited industry views on regulatory and spectrum management issues concerning:

- satellite uses of bands without an existing satellite allocation, in particular, bands that are licensed to mobile network operators for terrestrial wireless broadband.

Thank you for the opportunity to comment on the issues raised in the FYSO and at the 31 October 2023 tune-up.

### 1.1 About Free TV

Free TV Australia is the peak industry body for Australia's commercial television broadcasters. We advance the interests of our members in national policy debates, position the industry for the future in technology and innovation and highlight the important contribution commercial FTA television makes to Australia's culture and economy. We proudly represent all of Australia's commercial free-to-air television broadcasters in metropolitan, regional and remote licence areas.



Our members are dedicated to supporting and advancing the important contribution commercial free-to-air television makes to Australia's culture and economy. Free TV members provide vital local services to all Australians. Commercial television networks spend more than \$1.5 billion on Australian content every year, dedicating over 85% of their content expenditure to local programming.

A report released in September 2022 by Deloitte Access Economics, *Everybody Gets It: Revaluating the economic and social benefits of commercial television in Australia*, highlighted that in 2021, the commercial TV industry supported over 16,000 full-time equivalent jobs and contributed a total of \$2.5 billion into the local economy. Further, advertising on commercial TV contributed \$161 billion in brand value. Commercial television reaches an audience of 16 million Australians in an average week, with viewers watching around 3 hours per day.

The commercial television industry creates these benefits by delivering content across a wide range of genres, including news and current affairs, sport, entertainment, lifestyle and Australian drama. At no cost to the public, our members provide a wide array of channels across a range of genres, as well as rich online and mobile offerings.

A strong commercial broadcasting industry delivers important public policy outcomes for all Australians and is key to a healthy local production ecosystem. This in turn sustains Australian storytelling and local voices and is critical to maintaining and developing our national identity.

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## 1.2 Free TV comments

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Free TV commends the ACMA for acting promptly in response to the rapidly evolving opportunities for satellite direct-to-handset communications, including with the use of existing IMT allocations in Australia.

Free TV's interest is limited to the potential re-purposing of the 700 MHz IMT allocation for communication between satellites and mobile devices. This spectrum is adjacent to the UHF TV broadcasting allocation. In particular, we draw attention to the additional protections the 700 MHz spectrum licence technical framework currently affords to reception of TV transmissions in geographical areas where UHF TV 'Block E' channels are in use - these are the channels closest to transmissions from mobile base stations and mobile devices.

In general, satellite direct-to-handset communications should only take place in the 700 MHz band:

- following commercial agreement between the relevant spectrum licensee and a satellite services provider; and
- following review, and amendment as appropriate, of the technical framework of existing spectrum licences to accommodate satellite direct-to-handset communications, taking into account any potential impact of satellite direct-to-mobile services on TV reception, including in Block E areas.

We would not seek to preclude appropriately managed trials of satellite direct-to-handset communications using 700 MHz spectrum, however, provided they take adequate account of the need to protect TV reception arrangements. We express no view on the relationship of this work to WRC-27 Agenda Item 1.13.

We thank the ACMA for the opportunity to make submissions on the issues raised in the FYSO and at the tune-up.

Please do not hesitate to contact Free TV if you require any further information.