

ARA Submission

Satellite direct-to-mobile services: regulatory issues

Consultation Paper

25 January 2024

The ARA

The Australasian Railway Association (ARA) is the peak body for the rail sector in Australia and New Zealand, and advocates for more than 220 member organisations across the industry.

Our membership covers every aspect of the rail industry, including the:

- passenger and freight operators that keep essential rail services moving;
- track owners, managers, and contractors that deliver a safe and efficient rail infrastructure network; and
- suppliers, manufacturers, and consultants that drive innovation, productivity, and efficiency in the rail industry.

Our members are driven to support vibrant, sustainable and connected communities through greater use of rail across Australia and New Zealand. We bring together industry and government to help achieve this ambition.

Our advocacy is informed by an extensive research program to ensure we offer solutions that are grounded in evidence and focused on delivering tangible value in our daily lives.

The rail industry has a crucial role to play in the region's sustainable development and growth, and offers meaningful and rewarding careers for tens of thousands of people in the regions.

Our significant program of work is focused on supporting a strong advocacy agenda, and creating opportunities for the rail industry to network, collaborate and share information, and maximise the benefits we have to offer the wider community.

The ARA thanks the Australian Communications and Media Authority for the opportunity to make this submission, which has been developed in consultation with ARA member organisations.

Any questions regarding this submission should be directed to Jesse Baker, General Manager Passenger Rail and Safety via

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Australia's Rail Industry

Rail is a significant industry in Australia, creating economic activity through its operations and capital investments. It is an industry with activities across every major metropolitan and regional area and is supported by the full spectrum of skills in the Australian workforce.

In 2019, the rail industry contributed around \$30 billion to the Australian economy and employed more than 165,000 workers (directly and indirectly in full-time equivalent terms, FTE). The industry is made up of around 900 businesses that are located in approximately 20 major hubs.

The Australasian Railway Association (ARA) is the peak body for the rail industry throughout Australia and New Zealand

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Issues For Comment

The following information is provided by the ARA to respond to the matters for feedback presented in the “Satellite direct-to-mobile services: regulatory issues” consultation.

1. **Is the current spectrum management framework fit-for-purpose to manage these new satellite services? This includes spectrum-licensed bands and other bands covered by the LIPD class licence.**

ARA has no comment: ARA assumes any International Mobile Telecommunication (IMT) service operators will continue to comply with their spectrum licence conditions and operate within current spectrum management framework to manage interference risks.

2. **If not considered fit-for-purpose: What are your concerns? What is your proposed solution? What next steps should be taken?**

ARA considers current spectrum management frameworks to be fit-for-purpose.

3. **Are there any other commercial, regulatory or public-benefit implications we should take into account?**

ARA would like to highlight the potential public-benefit implications relating to the improved efficiency and interoperability of Australian railways which provide critical transport for passengers and freight across the country.

Radio telecommunication spectrum is vital for rail safety and control communications such as various communication-based train control systems and driver emergency communication.

The Council of Australian Governments’ 2011 Intergovernmental Agreement on Rail Safety Regulation and Investigation Reform committed the parties to improved rail safety and seamless national safety regulation of rail operations. Further, the Australian Government has committed to a workplan with the states and territories that includes improving the interoperability of rail systems.¹

Australian railways, that operate on the Defined Interstate Rail Network (DIRN) and in regional and remote locations, depend on private and public telecommunication services, where available. Satellite services are used to provide additional coverage and to provide a backup means of communication.

Satellite direct-to-mobile services are expected to provide text, voice, data, and IoT connectivity to unmodified phones and modems that are installed trackside, and on most passenger and freight trains in Australia, with improved performance compared to the existing satellite services currently used. The use of unmodified phones and modems will enable improved interoperability between train operators and coupled with the improved communications performance in regional and remote locations, will drive efficiency in the delivery and sustainment of train communications systems. Another potential benefit would be improved telecomms services to rail customers - i.e. passenger Wi-Fi.

ARA welcomes improved access to voice and data networks using standard 3GPP-based equipment that is anticipated from satellite direct-to-mobile services. This is a development that is expected to provide cost-effective support (especially in remote and low population areas) and benefit the Australian rail industry to meet its obligations under Rail Safety National Law and deliver value to Australian citizens and industry.

¹ [AFR Infrastructure Summit 2022 | Ministers for the Department of Infrastructure](#)