



TELSTRA GROUP LIMITED

Telstra submission to the ACMA Spectrum licence tax Updating the EME Component for 2024–25.

August 2024

23 August 2024



Introduction

Telstra welcomes the opportunity to respond to the Australian Communication and Media Authority (ACMA) consultation on the *Spectrum licence tax - Updating the EME Component for 2024–25*¹ (consultation paper). Our submission addresses the following:

- Expansion of the collection of this tax to 5G apparatus licence holders.
- Increased transparency regarding how the tax is dispersed, including:
 - EME (electromagnetic energy) Component funding – How the tax is being directed to various government funded programs?
 - Is the revenue being used for its original stated purpose?
- Allocate funding from the tax for the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) to undertake research into *5G advanced*² for a future public awareness campaign.

Telstra response to updating the EME Component for 2024–25.

Telstra supports the EME Component of the Spectrum Licence Tax and the associated EME program, notably the research being undertaken by ARPANSA. This research is essential to providing evidence to the general public of EME levels in the community, along with establishing EME standards.³ We generally support indexing increases in the EME component to the Consumer Price Index (CPI), however we note that this is subject to fluctuations in the CPI.⁴

There should be greater transparency on how the EME component revenue is allocated

Telstra would appreciate the ACMA providing greater transparency on the allocation of the EME Component, as this assists in ensuring that the Spectrum Licence Tax revenue is applied to programs and initiatives that deliver greater community awareness and understanding to alleviate concerns that EME is harmful. Telstra would appreciate reporting being provided in relation to:

- a. Itemisation of the programs receiving funding from the EME component, and the amount of funding allocated to each item. Telstra would appreciate details of the activities funded with the revenue from the program, e.g. websites,⁵ information videos,⁶ and research activities⁷ to address community concerns associated with 5G and electromagnetic energy.⁸

¹ The ACMA, August 2024, *Spectrum licence tax Updating the EME Component for 2024–25*, available at [https://www.acma.gov.au/consultations/2024-08/updates-spectrum-licence-tax#:~:text=From%202023%E2%80%9324%20and%20for,Consumer%20Price%20Index%20\(CPI\).](https://www.acma.gov.au/consultations/2024-08/updates-spectrum-licence-tax#:~:text=From%202023%E2%80%9324%20and%20for,Consumer%20Price%20Index%20(CPI).)

² GSMA, 2024, *5G-Advanced: Shaping the future of operator services marketing paper*, available at https://www.gsma.com/solutions-and-impact/technologies/networks/gsma_resources/5g-advanced-shaping-the-future-of-operator-services/

³ ARPANSA, 2024, *Electromagnetic Energy Program*, available at <https://www.arpansa.gov.au/research-and-expertise/electromagnetic-energy-program>

⁴ The ACMA, 2023, *Updates to spectrum licence taxes*, available at [https://www.acma.gov.au/consultations/2023-07/updates-spectrum-licence-taxes#:~:text=In%202023%E2%80%9324%20and%20each,Consumer%20Price%20Index%20\(CPI\).](https://www.acma.gov.au/consultations/2023-07/updates-spectrum-licence-taxes#:~:text=In%202023%E2%80%9324%20and%20each,Consumer%20Price%20Index%20(CPI).)

⁵ Department of Infrastructure, Transport, Regional Development, Communication and the Arts, 2024, *What is the safety standard for EME from telecommunications?*, available at <https://www.infrastructure.gov.au/media-communications-arts/spectrum/5g-and-eme/your-questions-answered/what-safety-standard-eme-telecommunications>

⁶ Department of Infrastructure, Transport, Regional Development, Communication and the Arts, 2024, *Wireless Connectivity and the Science of Safe Connection*, available at <https://www.infrastructure.gov.au/media-communications-arts/spectrum/5g-and-eme/resource-hub/videos>

⁷ Australian Radiation Protection and Nuclear Safety Agency, 2024, *EME Program Research Framework*, available at <https://www.arpansa.gov.au/research-and-expertise/electromagnetic-energy-program/eme-program-research-framework>

⁸ The ACMA, 2020, *Modifications to Apparatus and Spectrum Licences Taxes) Direction 2020, Explanatory Statement*, pp. 1-2



- b. ARPANSA funding, notably EME research, in particular what percentage of the revenue from the EME component is being directed to this research.

Future EME research priorities

Over the coming years 5G advanced⁹ will be introduced and Telstra would like the ACMA to consider allocation of funding for ARPANSA to undertake research on this technology in a timely manner, so that information is available for future public awareness campaigns.