

6th September 2024

The Manager, Wireless Broadband
Spectrum Planning and Engineering Branch
Australian Communications and Media Authority
PO Box 78
Belconnen ACT 2616

Submission to ACMA on Consultation on 1800 MHz and 2 GHz bands – Review of planning arrangements outside of spectrum licensed areas

OneWiFi's interest in the Consultation on 1800 MHz and 2 GHz bands is that as a wholesale-only Mobile Active Neutral Host we provide active network infrastructure that can be accessed, on an equitable basis, by all Mobile Network Operators (MNOs) holding a spectrum licence and holders of a radiocommunications licence for public telecommunications Services (PTS), to provide mobile coverage at the lowest marginal costs for all operators in underserved areas via services enabled by OneWiFi's Mobile Active Neutral Host solution.

OneWiFi has focused on rolling out its infrastructure in regional and rural localities, where there is no or limited mobile coverage, often where spectrum licensees including holders of 1800MHz and 2GHz licences for PTS may have spectrum which is not being utilised. This unutilised spectrum can be readily activated on our Mobile Active Neutral Host infrastructure for the benefit of all consumers and communities in the form of mobile service availability and choice, which strongly aligns with public interest objectives.

OneWiFi would expect that holders of 1800MHz and 2GHz licences for PTS would find it commercially attractive to share infrastructure in relevant locations which may also be supporting cellular mobile services. In particular OneWiFi's infrastructure facilitates the efficient use of spectrum by lowering the infrastructure costs in more geographical markets for activating spectrum for all operators. We are aware in particular of the premium value of mid band spectrum in regional areas and the need to maximise its utility in serving the community. Therefore, we strongly advocate for use it or lose it/share it conditions applying to licence holders where infrastructure sharing lowers the barrier for use. It is also important that prospective licensees don't try to warehouse spectrum as a contingency measure, without being time bound to KPIs.

The absence of suitable infrastructure may suppress demand for spectrum in some localities, particularly for niche operators.

ACMA is seeking comment on the following:

1. The analysis of utilisation in the bands.
2. Any other spectrum supply issues.
3. The case for action conclusion and the desirable planning outcomes.
4. The identified policy elements, or others that could be considered.
5. The analysis and preliminary views on the policy elements.
6. The need for an associates test when applying spectrum limits and how it could be conducted.

7. The proposed options, their assessment, and our conclusions.
8. Means to manage any initial high demand.
9. Other aspects of the technical frameworks.

OneWiFi supports the direction that ACMA is taking to facilitate the availability of 1800MHz for PTS use where it is otherwise not possible because of existing PTP assignments resulting in more efficient use of the spectrum

With regard to managing any initial high demand, apart from inherent commercial factors likely to suppress demand, OneWiFi considers that a practical Use it or lose it condition would further mitigate demand. Over the top licencing provides a mechanism for alternative users to test use of any apparent un or under used spectrum.

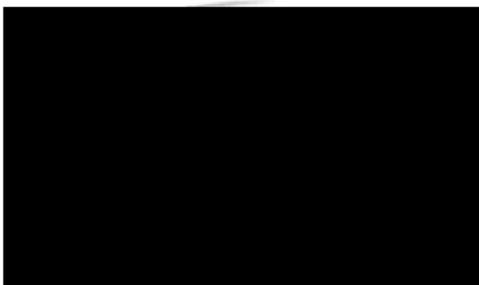
OneWiFi considers that there is merit, to the extent possible aligning licence conditions for PTS licensing in the 1800MHz and 2.1GHz bands with expiring spectrum licence conditions accordingly our submissions to ACMA on ESL are relevant here. Therefore, we offer our comments under 'Issues for Comment', items 2 and 4. OneWiFi also believes that while item 1 provides useful context for making an informed assessment, it does not allow disruptive business models and technologies and therefore, the status quo will /need to shift

OneWiFi believes Option 4 - changes to assignment priority, allocation quantum policy, PTP use and the introduction of over-the-top licensing, to be the most appropriate mechanism to not only deliver against **All** the stated Desirable Outcomes but also improve equitable outcomes for all industry participants (supply and demand) and facilitates maximising economic outcomes in regional, leverage evolving telecommunications business models (Neutral Host) and technology evolution (Direct to Handset Satellite Services and other allied service, etc). Option 4 would serve to future-proof spectrum usage.

The concern pertaining to 'potential impacts upon existing licensees', can be addressed by assessing OTTL applications against time-bound metrics.

Thank you for the opportunity for OneWiFi to put forward our view on 1800 MHz and 2 GHz bands arrangements and we would be pleased to provide additional information in clarification if required.

Yours faithfully,



DIRECTOR OF REGULATORY ENGAGEMENT AND POLICY
ONEWIFI & INFRASTRUCTURE