Access Partnership Response to

ACMA "Five-year spectrum outlook 2024–29 and 2024–25 work program"

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Introductory Remarks

Access Partnership appreciates the opportunity to submit a comment on the abovementioned Consultation and express his gratitude for the Spectrum Outlook Draft Consultation document released by the Australian Communications and Media Authority (ACMA). The insights provided in the draft Spectrum Outlook for the next five years (FYSO 2024-2029) offer a comprehensive overview of the spectrum management landscape, outlining key trends and factors shaping spectrum planning and allocation priorities.

Access Partnership recognises Australia's efforts to align with international trends affecting spectrum management especially in light of the decisions taken at WRC-23. Australia, led by the ACMA, stands out as a leading regulatory force in the Asia-Pacific region, taking proactive steps to establish a regional approach to critical issues. Access Partnership supports this proactive stance and overall intent.

The consultation on the draft FYSO is instrumental in fostering transparency regarding ACMA's spectrum management agenda. By engaging with industry stakeholders and the broader community, ACMA enables transparency around its spectrum work program, informs future activities, and provides stakeholders with predictability regarding spectrum planning, allocation, and regulatory licensing activities.

Comments

2 GHz MSS (1980–2010 MHz and 2170–2200 MHz)

The Access Partnership congratulates the ACMA on its comprehensive and forward-looking decision to re-plan the 2 GHz band for Mobile Satellite Services (MSS) in Australia. This initiative demonstrates a proactive approach to spectrum management that adapts to the changing needs of the telecommunications sector and the growing demand for innovative satellite applications. In addition, the adoption of measures to support terrestrial applications alongside MSS demonstrates a commitment to promoting complementary technologies and maximising spectrum potential.

Notwithstanding the above, it is worth noting that in the WRC-27 preparation process, there are multiple agenda items with direct implications for the future usage of the band. Agenda Item 1.13 deals with the bands 1 805-2 025 MHz and 2 110-2 200 MHz among others for direct

connectivity between space stations and IMT user equipment to complement terrestrial IMT network coverage while Agenda Item 1.14 focuses on the frequency bands 2010-2025 MHz (Earth-to-space) and 2160-2170 MHz in Regions 1 and 3, as well as 2120-2160 MHz in all Regions. Throughout the work cycle, there is also the possibility that the work in the band is combined to provide a unified framework. This would present a unique opportunity for Australia to introduce a clear, up-to-date framework. We strongly encourage ACMA to thoroughly consider the ongoing global discussions and studies pertaining to the 2 GHz band before finalizing any long-term decisions. It is imperative that these decisions do not hinder industry's ability to fully leverage the potential benefits of this band.

However, if ACMA wishes to proceed with the decision to re-plan this band, we believe that the allocation of a 2 × 25 MHz block for MSS across Australia, coupled with a price-based auction mechanism, would not be the best model to facilitate access to spectrum for innovative satellite applications. Instead, a 2 x 15 MHz and 2 x 10 MHz block allocation (the option presented in the Public Consultation 'Technical design features and allocation considerations for the 2 GHz MSS band (1980-2005 and 2170-2195 MHz)') could offer numerous benefits, including increased competition, efficient use of spectrum, promotion of innovation, optimised network deployment and flexible licensing arrangements. These benefits can contribute to a more dynamic and competitive telecommunications landscape, ultimately benefiting consumers and stimulating economic growth.

Now while the decision to use an auction mechanism to allocate spectrum in the 2 GHz band for mobile satellite services (MSS) in Australia may seem appropriate, it is essential to consider alternative models that could improve competitiveness and fairness in spectrum allocation.

One argument against using auctions as the sole mechanism is that they may not always result in optimal outcomes for all stakeholders. Auctions tend to favor large incumbents or financially strong players, potentially excluding smaller or innovative entities from accessing spectrum. This could stifle competition and limit the diversity of services and applications that could otherwise flourish in the allocated bands.

Alternative models, such as beauty contests or hybrid approaches, could offer a more balanced and inclusive spectrum allocation process. Beauty contests allow regulators to assess applicants based on predetermined criteria, such as technical expertise, service plans, and coverage commitments. This approach ensures that spectrum is allocated to operators who can deliver the most value to consumers and the market.

Hybrid approaches combine elements of auctions with other mechanisms, providing flexibility and customization to suit the specific needs of the spectrum band and the telecommunications market. By incorporating elements like upfront payments, performance obligations, and competitive bidding rounds, hybrid models can strike a delicate balance between encouraging competition and innovation, without placing excessive emphasis solely on revenue generation.

Bands being studied under WRC-27 agenda item 1.13.

Access Partnership extends its gratitude to ACMA for its efforts to address the important issue of bands under consideration in agenda item 1.13 of WRC-27. We wish to express our willingness to support ACMA in any way necessary in connection with this initiative.

The consideration of possible new allocations to the mobile-satellite service under WRC-27 agenda item 1.13 represents an important opportunity to improve connectivity and complement the coverage of terrestrial IMT networks in Australia.

Final Remarks

As a trusted advisor in the telecommunications industry, Access Partnership is committed to supporting ACMA in navigating these complex issues and fostering a regulatory environment that promotes innovation and growth. We would welcome the opportunity to further discuss our concerns and collaborate on finding a mutually beneficial path forward.

Thank you for considering our input. We look forward to the next steps and remain available to provide any further assistance or clarification required.