

27 February 2013

Mrs Bridget Kerans  
Spectrum Transformation and Government Section  
Australian Communications and Media Authority  
By email: 900MHzreview@acma.gov.au

Dear Mrs Kerans,

The Australian Mobile Telecommunications Association (AMTA) welcomes the opportunity to participate in the ACMA's review of the 800 MHz and 900 MHz bands and provide comment on the *803-960 MHz band – Exploring Options for Future Change Discussion Paper* (the Paper).

### ***Demand for Mobile Broadband***

The actual and forecast growth in demand for mobile broadband is unrelenting.

The ABS 'Internet Activity' report found volume of data downloaded by mobile handsets increased 32% to 6,610 Terabytes from Jun-Dec 2011.<sup>1</sup>

Ericsson's Mobility Report (Nov 2012) found that global mobile data traffic doubled between Q3 2011 and Q3 2012 and forecasts mobile data to grow by 12 times between 2012 and 2018. Ericsson predicts this growth will be driven primarily by video. Ericsson further predicts that LTE (Long Term Evolution) subscriptions will reach 1.6 billion by 2018.<sup>2</sup>

AMTA strongly supports the ACMA's revised review objectives as outlined in section 1.5 of the paper. AMTA particularly appreciates the inclusion of international harmonisation as an objective. AMTA believes that international harmonisation, where appropriate and possible, enables economies of scale to be realised by the mobile industry with significant benefits to consumers in terms of prices for mobile devices.

### ***PSMB in the 800 MHz Band***

Public Safety Agencies (PSAs) rely on both fixed and mobile telecommunication services when they respond to emergencies and extreme weather events. It is vital that PSAs have access to the latest technology in relation to mobile communications services.

Radiofrequency spectrum is not of itself a technology but an important national resource. AMTA supports the ACMA's extensive work in identifying spectrum for the purposes of PSAs and public safety in Australia. AMTA notes that the ACMA has reviewed PSA use of the 400 MHz band as well as identified 50 MHz of spectrum in the 4.9 GHz band to provide very high-speed, short range on-demand capacity to areas of high activity for support a wide range of public safety uses. This band is also internationally harmonised for public protection and disaster relief (PPDR).

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<sup>1</sup> [ABS Internet Activity report June 2012](#)

<sup>2</sup> [Ericsson Mobility Report Nov 2012](#)



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AMTA supports the ACMA's decision, made in October 2012, to earmark 2 x 5 MHz from the 800 MHz band for PSAs. AMTA agrees with the Minister for Broadband, Communications and the Digital Economy's statement that:

*"The Government considers the allocation of spectrum from the 800 MHz band to be the best option to meet the communication needs of our public safety agencies."*<sup>3</sup>

AMTA considers that the proposed allocation of 809-814 MHz paired with 854-859 MHz will be appropriate and adequate for the implementation of a national interoperable mobile broadband capability for PSAs. AMTA looks forward to further engagement with the Public Safety Mobile Broadband Steering Committee (PSMBSC) to progress the implementation of this proposal.

AMTA notes that New Zealand Government has recently announced that New Zealand PSAs have expressed a preference for spectrum for public safety purposes to be allocated from the extended 800 MHz band, in alignment with Australian and regional plans.<sup>4</sup>

### ***The 900 MHz Band***

AMTA supports the ACMA's proposal for replanning of the paired 890-915 MHz and 935-960 MHz segments of the 900 MHz band into 5 MHz FDD paired blocks.

AMTA suggests that the timeframe for replanning of the 900 MHz band will be dependent on some of the outcomes of the review of the 800 MHz band and the timeframe will therefore need to be considered in conjunction with that review process.

AMTA refers the ACMA to its members' own submissions in relation to reallocation preferences for the 900 MHz band.

AMTA looks forward to continued participation in the review of the 800 MHz and 900 MHz bands.

Yours sincerely,



Lisa Brown  
Manager, Policy  
AMTA

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<sup>3</sup> Senator the Hon Senator Conroy, Minister for Broadband, Communications and the Digital Economy, Media Release, 29 Oct 2012, "[Spectrum for Public Safety Agencies](#)"

<sup>4</sup> ZDNet 21 Feb 2013 [NZ Plans 4G Spectrum Auction](#)