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Thursday 29 October 2015

The Manager  
Spectrum Planning Section  
Spectrum Infrastructure Branch  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616  
Australia

**Submission to Beyond 2020 – A Spectrum Management Strategy to Address the Growth in Mobile Broadband Capacity**

Dear Sir / Madam,

The GSMA welcomes the recent promulgation of the discussion paper “Beyond 2020 - A spectrum management strategy to address the growth in mobile broadband capacity” (“Discussion Paper”) by the Australian Communications and Media Authority (“ACMA”). The Discussion Paper sets out the ACMA’s views on a proposed process for its consideration of additional spectrum for mobile broadband services and seeks comments from industry. With significant current and forecast growth in the demand for mobile services both globally and in Australia this is an important matter on which the GSMA wishes to comment.

This submission is structured as follows:

- About the GSMA
- General Comments
- Comments on Specific Matters

About the GSMA

The GSMA represents the interests of mobile operators worldwide, uniting nearly 800 operators with more than 250 companies in the broader mobile ecosystem, including handset and device makers, software companies, equipment providers and internet companies, as well as organisations in adjacent industry sectors. The GSMA also produces industry-leading events such as Mobile World Congress, Mobile World Congress Shanghai and the Mobile 360 Series conferences.

For more information, please visit the GSMA corporate website at [www.gsma.com](http://www.gsma.com).



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## General Comments

As set out in the Discussion Paper the ACMA notes that the growth in mobile broadband traffic has been the biggest driver of changes in the use of radiofrequency spectrum. This has led the ACMA to reconsider the process by which it considers additional spectrum for use by mobile services. In particular, the ACMA proposes to shift from allocating mobile spectrum from the setting of “explicit quantitative targets” to a “contingency planning model”. The proposed approach will require the ACMA to closely monitor developments in the mobile broadband industry at both the local and international levels to enable it to make spectrum available for mobile broadband as and when it is needed.

The GSMA acknowledges the ACMA’s tacit recognition that ensuring that there is sufficient spectrum for mobile broadband is a significant matter and one which warrants a dedicated process and also requires considerable industry consultation. The ACMA’s proposed approach to mobile spectrum allocation suggests that the ACMA intends to treat this as a special case which requires the ACMA’s dedicated on-going attention. In this context, the GSMA welcomes the ACMA’s proposal.

However, the GSMA is concerned that the Discussion Paper expresses the view that there is already *“sufficient spectrum available for mobile broadband services in the short to medium term.”* The GSMA is concerned that with the way that the industry is currently evolving with 4G, 5G and the Internet of Things, the demand for mobile data will accelerate. This suggests that there is a very real possibility that by 2020 the available spectrum will not meet consumer and business demand. Accordingly, the GSMA would urge the ACMA to recognize this possibility and place a greater sense of urgency into its spectrum planning process.

The GSMA notes that the ACMA’s proposed approach to mobile spectrum allocation involves a close on-going dialogue with mobile network operators (MNOs). As such, MNOs would need to ensure that the ACMA is fully informed with regard to a wide range of factors including, for example:

- growth in mobile data traffic
- technological developments
- spectrum sharing arrangements among MNOs
- MNO infrastructure deployment

The close industry dialogue means that the ACMA explicitly recognizes that MNOs must also share responsibility for ensuring that scarce national spectrum resources are used efficiently and effectively. Provided that such information is treated in confidence and kept secure by the ACMA, the GSMA considers this a welcome development.

*Prima facie*, the ACMA’s proposal will, if adopted, require the ACMA to devote additional resources to this activity. That is, resources of the ACMA will be required to closely monitor developments in the mobile broadband industry and to engage closely with MNOs. Such resources may be diverted from



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other activities undertaken by the ACMA or be an additional resource requirement. The GSMA considers that the greatest concern with the ACMA's proposal is the possibility that it is under-resourced.

### Comments on Specific Matters

The Discussion Paper seeks comments from stakeholders in relation to some specific matters. The GSMA's response to these matters is given in the discussion that follows.

#### *ACMA Assumptions*

The ACMA has identified ten assumptions which are to be used in the development of its proposed mobile broadband strategies and an associated work program. Having reviewed these assumptions, the GSMA considers them to be comprehensive and where relevant supported by available evidence. As such, the GSMA supports the ACMA's adoption of these assumptions.

#### *Assessing the Highest Value Use of a Spectrum Band*

The Discussion Paper notes that the ACMA will be likely to consider a range of factors when making an assessment of the potential change of use of a given spectrum band to mobile broadband. It is noted that such factors reflect emerging international best practice. The GSMA accepts that the factors likely to be considered by the ACMA for such an assessment are rational and if adopted would be expected to result in a sound conclusion.

The GSMA is, however, concerned that the assessment process itself is kept in perspective. That is, the adoption of such a thorough assessment may be costly to implement and may take a relatively long time period to complete. In this context, the GSMA submits that the ACMA should also consider, for example, the outcomes of spectrum auctions in overseas markets as an initial basis for assessing the highest value use of a spectrum band.

#### *ACMA Strategies*

The ACMA proposes to adopt a set of five strategies to address the growth in demand for mobile broadband capacity. The GSMA sees these strategies as both comprehensive and practical for this exercise. Accordingly, the GSMA supports the ACMA's adoption of these strategies.

Key among the five strategies is "Strategy 2: Transparent spectrum management planning process". This particular strategy features a six stage process for consideration of additional spectrum for mobile broadband use from "monitoring" to "allocation". The adoption of this process would mean that at any one time different spectrum bands would be in different stages in the process of moving toward allocation to mobile services. The GSMA considers to be a practical strategy which keeps the ACMA's options open and gives it the flexibility to speed up (or down) the progression of multiple spectrum bands toward mobile broadband use as market conditions continue to evolve.



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### *Proposed Work Plan*

The Discussion Paper sets out the ACMA's proposed mobile broadband spectrum work plan within the "Strategy 2" framework as described in the previous section. The GSMA notes that the work plan is comprehensive and that it includes the GSMA's target bands for mobile service identification for WRC-15 Agenda item 1.1.

The GSMA notes that the 2.7-2.9 GHz spectrum band is listed in the "Monitoring" stage of the framework. This spectrum band is being considered for mobile service identification at WRC-15 and there is now a considerable body of regional and international research into the suitability of this band for mobile service identification. As such, the GSMA would have hoped that this band would be in the "Initial Investigation" stage of the framework. The GSMA urges the ACMA to reconsider the position of the 2.7-2.9 GHz spectrum band in its work plan following the outcome of WRC-15.

In addition, the GSMA notes that spectrum above 6 GHz is also listed in the "Monitoring" stage of the Strategy 2 framework. With industry discussion already underway on 5G, the GSMA suggests that the ACMA should progress this item to Stage 1 "Initial Investigation" in its spectrum work plan.

### *Closing*

The GSMA appreciates the opportunity to comment on the Discussion Paper. Ensuring that there is sufficient spectrum available for mobile services is an important matter which the ACMA clearly recognises. The GSMA is supportive of the ACMA's proposed approach to mobile spectrum allocation as outlined in the Discussion Paper but cautions that the ACMA must ensure that the approach is adequately resourced. In addition, the GSMA is concerned that available spectrum may not satisfy consumer and business demand for mobile data by 2020 and accordingly, urges the ACMA to adopt a greater sense of urgency in its spectrum planning process. The GSMA would be pleased to address any questions that you may have regarding this submission.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Alasdair Grant".

Alasdair Grant  
Head of Asia