Telco Authority

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The Manager
Spectrum Licensing Policy Section
Australian Communications and Media Authority

Online submission

Dear Manager

Submission to ACMA - Facilitating trials of radionavigation-satellite service (RNSS) repeater devices in road tunnels (consultation IFC 15/2020)

I am pleased to provide comment to the Australian Communications and Media Authority (ACMA), from the NSW Government Telecommunications Authority (NSW Telco Authority), on the *Facilitating trials of radionavigation-satellite service (RNSS) repeater devices in road tunnels - consultation paper*, released in May 2020.

This submission is made in collaboration with, and on behalf of New South Wales emergency services organisations, with whom the NSW Telco Authority shares unified positions on the issues and proposals raised in the consultation paper. These emergency services organisations are:

- Ambulance NSW
- Fire and Rescue NSW
- NSW Police Force
- NSW Rural Fire Service; and
- NSW State Emergency Service.

The NSW Telco Authority is constituted by, and functions under, the Government *Telecommunications Act 2018* (NSW) to operate and maintain mission-critical operational communications services for public safety and government agencies within New South Wales. The Authority holds responsibility for coordinating telecommunications services support during emergencies under the *State Emergency and Rescue Management Act 1989* (NSW), has a central role in coordinating spectrum holdings on behalf of government agencies and manages several major digital connectivity programs for the State.

As New South Wales progresses with development of its extensive Sydney Integrated Road Tunnel Network (SIRTN), the availability of RNSS repeaters/simulators becomes essential to the effective delivery of public safety and emergency services to the community. The risks derived from inadequate location services in the SIRTN were identified by Fire and Rescue NSW in consultation with Transport for NSW and the Sydney Motorway Corporation during planning and the assessment of the fire safety and response arrangements within the tunnel network.

Subsequently, NSW established a working group, including Transport for NSW, Fire and Rescue NSW, NSW Police Force, NSW Ambulance and the NSW Telco Authority, to identify a solution path which is effective for the range of different emergency services organisations' technologies required to assist in asset dispatch and other emergency management activities that utilise location services. The working group identified that an RNSS repeater/rebroadcaster solution was appropriate to achieve this as it is non-proprietary, robust and compatible with mission-critical operational technologies. No suitable alternatives were identified.

The working group then commenced engagement with the ACMA in consideration of the current impediments to the implementation of these devices. On behalf of the working group, the NSW Telco Authority acknowledges the priority that the ACMA has placed on consideration of this issue

in recognition of the public interest in enabling implementation of RNSS repeater devices to support critical emergency management activities and for the general use of this technology by the public and transport industry towards the safer use of road tunnels.

The New South Wales emergency services organisations are collectively supportive of the commencement of the RNSS repeater devices trials to occur in the SIRTN as soon as practicable, and the working group has identified a three-stage trial of an RNSS simulator network led by Transport for NSW and involving Fire and Rescue NSW, NSW Police Force and NSW Ambulance as its preferred approach. As progress on the tunnel network continues in stages, time is of the essence to complete the trials towards the objective of a full roll-out within the SIRTN.

A summary of the collective New South Wales agency positions on the issues and proposals raised in the discussion paper follows:

- The approach proposed by the ACMA in the discussion paper to enable the trials is generally supported and appreciated.
- Option 3 (Amend the Declaration, and authorise trials through scientific licensing) is supported to enable the efficient commencement of the trials.
- Option 2 (Amend the Declaration, and develop long-term licensing arrangements) is desirable for the long-term, and should be pursued in parallel with Option 3 and the conduct of the trials for future implementation. This should occur under the apparatus licencing regime to minimise the risks of conflict or interference between devices.
- The long-term approach should not be limited to enabling RNSS repeaters in road tunnels but should include scope for other RNSS-denied environments (such as railway tunnels and stations) to support emergency management activities.
- Compliance with technical operating parameters should be required but without inhibiting the future adoption of technological enhancements or advancements.

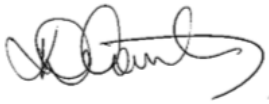
Further information from two working group members relating to their specific, individual functions and elaborating on these collective positions, is central to this joint submission and included as attachments as follows:

- Attachment A: **Fire and Rescue NSW** – Facilitating trials of radionavigation-satellite service (RNSS) repeater devices in road tunnels - Response to the consultation paper
- Attachment B: **NSW Police Force** - Submission to ACMA – Arrangements for jamming devices and radiocommunications device exemptions – consultation 15/2020

The NSW Telco Authority and the working group look forward to further engagement with the ACMA towards undertaking the RNSS repeater trials and implementing the regulatory changes required to enable the ongoing licencing and deployment of these devices upon successful trial completion.

Should you wish to discuss this submission, please contact Alison Port, Director Engineering and Spectrum, NSW Telco Authority on 02 8522 7447 or email at alison.port@customerservice.nsw.gov.au.

Yours sincerely



Kylie De Courteney
Managing Director, NSW Telco Authority

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