



Ms Linda Caruso,  
General Manager - Communications Infrastructure Division  
Australian Communications and Media Authority

**Ref: 2020-31**

Dear Ms Linda Caruso,

On behalf of the Australian Space Agency (the Agency), I would like to thank the Australian Communications and Media Authority (ACMA) for the opportunity to comment on both the Implementation of the Spectrum Pricing Review and the draft Five Year Spectrum Outlook consultations.

The Agency was established to transform and grow a globally respected Australian space industry that lifts the broader economy, inspires and improves the lives of Australians – underpinned by strong national and international engagement. The Government has set a target to triple the size of the Australian space sector from \$3.9 billion to \$12 billion and create another 20,000 jobs by 2030. The path to achieve this vision is outlined in the [Australian Civil Space Strategy 2019-2028](#). Growth in the Australian market is currently strong, with IBIS World<sup>1</sup> forecasting a growth rate of 7.4 per cent over the period 2020-2025 and expected to reach \$8 billion in 2025. This growing space industry is heavily dependent on spectrum and access to it.

This demand on spectrum is further compounded by an emerging wave of lower-cost, miniaturised hardware that can be sent into orbit cheaper and faster than ever before, enabling an even greater number of sectors to affordably access space. Most notably in this changing environment is the increased opportunity for small business, academic, and scientific short duration space missions. As a result, and as outlined in the Civil Space Strategy, space technologies are playing an increasingly important role in many areas of Australia's economy, from supporting agriculture, transportation, drought through to disaster management.

To better characterise the issues these 'Space 2.0' entrants may face, and to inform the ACMA's consultation process, the Agency canvassed feedback from a number of educational, research and smaller Australian space industry representatives. Those sampled predominately fell into two categories: low-Earth orbit two-way satellite communications and Telemetry, Tracking and Command (TT&C) of low-Earth orbit satellites and launch vehicles.

Two of the most notable points raised from the 22 respondents was that price (particularly for new satellites filings) was a barrier to entry, and almost three quarters of respondents indicated licence processing time impacted their scientific, educational or business outcomes. In addition to this, three further suggestions were presented to the Agency:

- That the spectrum cost recovery framework evolve to a tiered approach that considers revenue particularly for academic, research and start-up businesses. It was also suggested that partial to

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<sup>1</sup> IBISWorld. (2020). Satellite Communications and Astronautics in Australia.  
<https://clients1.ibisworld.com.au/reports/au/industry/default.aspx?entid=5545>



full cost recovery waivers be available to academia, science and start-up businesses, to support the growth and transformation of the industry.

- That the ACMA consider the development of an online 'process map' and associated training, so academia, science and start-up businesses can understand early what investments (both financial and time) are required when planning space missions.
- That the ACMA consider additional resourcing to support case management of applications, for example to assist in capturing and supporting the submission of requests, and to support the expected increased demand for TT&C (both of satellite and launch vehicles).

In addition to the above commentary, the Agency would like to highlight to the ACMA that many representatives reinforced the excellence of ACMA staff for what are highly technically and regulatory complex roles.

Should there be any questions on the issues outlined in the letter, I can be contacted by email at [Anthony.Murfett@space.gov.au](mailto:Anthony.Murfett@space.gov.au) or by phone on (08) 8406 4772.

I would also like to highlight that the Agency is committed to continue working collaboratively with the ACMA as the Australian space sector rapidly changes.

Thank you again for providing an opportunity to comment.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Anthony Murfett", with a long horizontal stroke extending to the left.

Anthony Murfett  
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