

Our ref. BN19/951
Your ref. IFC:11/2019

Australian Communications and Media Authority
Communications Infrastructure Division
Spectrum Planning and Engineering Branch

By online submission

Reconfiguring the 900 MHz band – Options paper

Dear Executive Manager

I am pleased to provide comment, on behalf of the NSW Government Telecommunications Authority (NSW Telco Authority), on the 'Reconfiguring the 900 MHz band – Options paper', released in April 2019.

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 also has a central role in coordinating spectrum holdings on behalf of NSW government agencies.

The options paper includes discussion of alternatives for reallocation of the 850 MHz expansion band, potentially linking it with the 900 MHz band processes. The 850 MHz expansion band is of great interest to the NSW Telco Authority and to public safety and emergency service agencies nationally, due to its planned, future application for public safety mobile broadband (PSMB).

PSMB is an operational communications tool for public safety agencies and emergency services which will enhance the efficacy of their day-to-day frontline activities, the management of emergency events and responses to public safety incidents. The implementation of a nationally interoperable PSMB capability will improve public safety outcomes, enabling operational communications between agencies and across jurisdictional borders.

At the Council of Australian Governments meeting on 12 December 2018, all jurisdictions agreed to continue the collective pursuit of a national PSMB capability, including the resolution of its spectrum arrangements in parallel with the conduct of PSMB proof-of-concept trials. Central to a nationally interoperable PSMB capability is dedicated spectrum, for which the Australian Government has set-aside 5 + 5 MHz in the 850 MHz expansion band without identifying a specific lot allocation within that band.

In responding to the "Reconfiguring the 900MHz band" document, NSW Telco Authority wishes to provide commentary on the below question posed in the paper:

9. The ACMA is aware that due to public safety mobile broadband (PSMB) negotiations there is a request to set aside 2 x 5 MHz of spectrum for a PSMB network. While the lot location for this spectrum in the 850 MHz expansion band has not been identified, it is expected that the remaining blocks at the top or bottom of the band would be put to market. Do stakeholders have a view on the relative technical efficiency of the remaining blocks of spectrum for carrier services?

The PSMB proof-of-concept processes, being led by the NSW Telco Authority on behalf of all jurisdictions, will contribute to inform stakeholders of the viable and/or preferred frequency lot or lots for PSMB, which may be influenced by factors including the current and future maturity of the relevant equipment ecosystems and the technical capabilities based on global standards. This, in turn, will factor in the consultation between the Commonwealth and the states and territories to determine the lot allocation for PSMB.

As the final decision on the lot allocation for PSMB is yet to be settled, the remaining lots available for carriers are not yet identified. Consideration of broader technical efficiency for carriers should be contemplated in balance with the lot requirements identified for a PSMB capability. This includes ensuring the objects of the *Radiocommunications Act 1992* (Cth) regarding the adequate provision of spectrum for law enforcement and emergency services are met when allocating spectrum.

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@finance.nsw.gov.au.

Yours sincerely


Kate Foy
Managing Director
NSW Telco Authority

15/5/15