

Mark Arkell

From: Giles Tanner
Sent: Wednesday, 3 August 2022 11:08 AM
To: Mark Arkell; Christopher Hose
Subject: Free TV Australia submission in response to IFC 19/2022, Proposed updates to channel arrangements in the 7.2 GHz band

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To: The Proper Officer

We write in response to the ACMA IFC, 'Proposed updates to channel arrangements in the 7.2 GHz band - IFC 19/2022'. On 27 July, ACMA's Mark Arkell confirmed that Free TV had an extension until Wednesday, 3 August to respond.

Free TV is the peak body for commercial TV broadcasting in Australia. Relevantly, it represents the interests of Seven Network, Nine Network and Network Ten, each of which holds a fixed (television outside broadcast network) apparatus licence authorising television outside broadcasting Australia-wide in frequency bands including 7.2 GHz.

Free TV is happy to endorse the proposed new channel arrangements for TOB in 7.2 GHz.

If ACMA proceeds with the changes to RALI FX-03, the total amount of 7.2 GHz spectrum available to the three networks under the revised raster will reduce from the current 90 MHz, to 72 MHz. While the issue of apparatus licence taxes is outside the scope of RALI FX-03, we note that each network currently pays an annual licence tax of \$415,899 in respect of spectrum entitlements in the 2 GHz, 2.2 GHz, 7.2 GHz and 13 GHz bands. This tax is not broken down on a band-by-band basis, but ought substantially to reflect the value of spectrum TOB operations deny to other users.

The ACMA's draft Five-year Spectrum Outlook 2022-27 foreshadows that ACMA will be consulting on various spectrum pricing issues in Q4 2022. We look forward to engaging with the ACMA on the appropriateness of the current licence tax for TOB in that context.

Kind regards

Giles Tanner
Director of Technology Strategy



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