

From: [REDACTED]
To: [ACMA Frequency Planning](#)
Subject: Exploring future use of the 1.9 GHz band - consultation 40/2021
Date: Wednesday, 19 April 2023 3:46:02 PM
Attachments: [image001.png](#)

Dear Manager,

Please find following comments from the NSW Telco Authority on the consultation, Exploring Future Use of the 1.9GHz band. Please confirm receipt of this email.

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 NSW. The NSW Telco 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 major digital connectivity programs for the NSW Government. The NSW Telco Authority appreciates the opportunity to provide comment on submissions made under this consultation.

The NSW Telco Authority notes comments in the Australasian Railway Association (ARA) submission that 1.9 GHz (1900 to 1910 MHz) spectrum should be allocated for Mission Critical (MCX) services within rail corridors to be used by rail services. This should be in addition to the current allocation of 15 MHz in the 1800 MHz band to allow transition from GSM-R to the Future Railway Mobile Communication System.

Currently, 5 + 5 MHz of spectrum in Band 27 is reserved for public safety use. The international benchmark for Public Safety Mobile Broadband (PSMB), which will enable emergency services to operationalise mobile broadband connectivity in the field at all times, is 10 + 10 MHz, as allocated by authorities in the United States, Canada, South Korea and Qatar. In 2022, NSW executed a PSMB proof of concept on behalf of all Australian jurisdictions. Testing identified a significantly worse user experience when working with only 5MHz and that this allocation may not meet all Emergency Service Organisation requirements. This finding validates the international benchmark. In addition, industry providers have indicated that they have no interest in developing devices or infrastructure for Band 27, making the allocation for PSMB in Australia unusable.

When there is no dedicated spectrum available for public safety purposes in Australia the consequences will be increased cost, complexity and delays to the PSMB, something that Australia's first responders and communities can ill afford.

The NSW Telco Authority suggests that both the 15 MHz of spectrum holding in the 1800 MHz band (currently licenced to rail) and an allocation of spectrum within the 1.9 GHz band, should also be reserved for public safety use outside of rail corridors, via an area-wide class licence in line with public safety coverage projections across Australia for 4G LTE or 5G NR technology. This would better support Australian emergency services organisations to provide PSMB coverage in high-risk areas in order to manage

emergencies and natural disasters with greater efficiency. The NSW Telco Authority has briefed Transport for NSW and Sydney Trains on our comments.

The decisions ACMA takes now will either mean the success of PSMB in Australia or sentencing the program to years of delay and complexity. We ask for your support in ensuring spectrum in the 1800MHz and 1900MHz band is retained for public safety purposes.

Kind regards,

[Redacted]

Associate Director, Policy | Strategy and Innovation

NSW Telco Authority | Department of Customer Service

p [Redacted] or Teams

e [Redacted] | www.telco.nsw.gov.au

McKell Building, Level 10, 2-24 Rawson Place, Sydney NSW 2000



**Telco
Authority**