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Tuesday, 16 July 2024

The Manager  
Spectrum Licensing Policy Section  
Australian Communications and Media Authority  
PO Box 13112 Law Courts  
Melbourne VIC 8010

Dear Sir/Madam,

**RE: Proposed new framework for licensing radionavigation-satellite service retransmission technologies**

Transurban Limited (Transurban) appreciates the opportunity to respond to the Australian Communications and Media Authority's (ACMA) proposal to enable long-term licensing for radionavigation-satellite service (RNSS) retransmission devices.

Everything we do, works to get people where they want to go, as quickly and safely as possible. We strengthen communities through transport. We listen and respond to community needs, and we strive to champion road safety and empower our customers. Technology and innovation are key enablers at the heart of how we do this.

Transurban operate multiple tunnels across Queensland, New South Wales, and Victoria. Our WestConnex tunnels in New South Wales are some of the longest and most navigationally complex tunnels in the world. Committed to our customers, we have invested in tunnel positioning technologies in the construction of our new and older tunnels to uplift safety and customer experience. We have received strong feedback from our customers that the investment is empowering our customers. We have measured a significant reduction in stopped and reversing vehicles around tunnel exits, evidencing the positioning technology to have a significant material impact on safety. However, this technology has many limitations including widespread use with other road users, particularly emergency services.

Separately, we recently collaborated with Transport for New South Wales and emergency services to trial RNSS repeater technology in our Cooks River Crossing tunnel in New South Wales under a scientific assigned apparatus licence. The licencing we found suitable for this trial and therefore concur with the ACMA's preference of continuing to use an apparatus licence for long term licencing. Further to this, we agree and underscore the ability of an apparatus licence to provide visibility to the ACMA of the location of RNSS stations and therefore drive transparency and demonstrate compliance to the Radiocommunications Assignment and Licensing Instructions (RALI), we note currently still in draft. Registration (Section 4.7) within the RALI we see as an effective mechanism to achieve this.

In regards, to the fees; the proposed flat tax amount per RNSS repeater system we see as practical and economical.

We see no issues with the proposed changes to remade instruments that are sunseting.

Transurban is consistently known for its ambition, innovation, and long-term outlook. We are actively engaged in Cooperative Intelligent Transport (C-ITS) and Connected and Autonomous Vehicles (CAV) development. To this end we understand positioning and timing as a critical enabler in the development and enablement of C-ITS and CAVs. Today, RNSS retransmission technologies are key to uplifting safety and positioning capabilities unanimously.

Long term licencing including economical fees and development of technical requirements and instruments of RNSS retransmission technologies are important steps in advancing safety and connectivity ubiquitously.

We are keen to continue to work with government in enabling RNSS retransmission technologies for the use of all road users. We thank the ACMA again for allowing us to provide our feedback and look forward to continuing to contribute and support further developments.

Yours sincerely

Cameron Gillanders

Domain Lead – Road User Communications

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