



17 April 2025

The Manager  
Spectrum Licensing Policy Section  
Australian Communications and Media Authority  
PO Box 78  
Belconnen ACT 2616

**Re: Amazon Web Services, Inc. (AWS) Submission to the Australian Communications and Media Authority's (ACMA) Consultation on the Five-Year Spectrum Outlook (FYSO) 2025–30**

Amazon Web Services, Inc. welcomes the opportunity to comment on the ACMA's draft Five-Year Spectrum Outlook 2025-30. We appreciate the opportunity to contribute to the discussion on Australia's spectrum management priorities and commend the ACMA for its comprehensive approach in addressing the evolving needs of spectrum users.

Our comments focus on promoting the availability of spectrum for satellite services. Through the AWS Ground Station service, AWS is committed to supporting the growth of the Australian space industry. AWS Ground Station is a cloud service that enables satellite operators to transmit commands and downlink data across multiple regions quickly, easily, and cost effectively. The high costs to build and operate international earth stations are a major barrier to entry for the space industry. AWS Ground Station supports a wide range of non-geosynchronous orbit (NGSO) satellite use cases, including Earth Observation (EO) satellites operating under the Earth Exploration-Satellite Service (EESS).

We strongly support the ACMA's objective in the draft FYSO to ensure the regulatory environment continues to facilitate the use of low earth orbit (LEO) satellites. Australia has become an important communications centre for NGSO satellites from around the world. While the ACMA's leadership has been successful in fostering this role for Australia, there are additional steps that the ACMA could take related to radiocommunications licensing to keep Australia competitive in the rapidly growing LEO satellite industry.

**Licence tax**

In particular, we encourage the ACMA to consider international benchmarking in reviewing its apparatus license tax framework. Currently, even with available discounts, Australia's license fees are significantly more expensive than those of other countries. This disparity acts as a disincentive to further investment and innovation.

Particularly in the X-band EESS downlink band, where a number of operators hold licences with 375 MHz bandwidth in low and remote density areas, the licence tax is a pain point. We believe the tax rate in the 5.0-8.5 GHz range for Low and Remote Density Areas should be reduced well below where it is today: at AUD0.0476/kHz and AUD0.0230/kHz. In particular, we note that the rate in Low Density Areas (LDA) is just under half of what it is in Medium Density Areas like Newcastle, Perth and Adelaide. We believe that an earth station siting policy encouraging satellite earth station operators to be located in regional and remote areas should be incentivised with a discount of more than just ~50%.



### **Flexibility in the requirement to align with ITU filing parameters**

AWS encourages the ACMA to adopt a more flexible approach to aligning ITU filings with spectrum licence applications. Under the current requirements, the parameters of a proposed earth station licence must be completely within the 'envelope' of the parameters listed in the corresponding ITU filings for the satellite system with which communications would be authorised under the proposed licence.

This stringent requirement makes Australia a relatively difficult place to license and operate earth stations in, compared to other countries around the world, and presents difficulties and regulatory overhead for these operators. This creates a challenge whereby (a) the Australian licence needs to align with the information in an ITU filing which is already with the ITU, and (b) for this to work, the ITU filing needs to be made to include parameters that would support the Australian earth station. Therefore, in practice, the satellite operator needs to have identified all possible suppliers and developed Emission and Earth Station parameters that would support all of these *before* making the filing. Furthermore, they would likely not aim to be doing so, since this appears to be an ACMA-specific requirement. Modifying the ITU filing to support a particular supplier's facility within Australia places a burden on the satellite operator, and may unnecessarily put some Australian suppliers at a disadvantage compared to suppliers in other countries. Where there is an existing, established relationship between satellite system and ground station operators, this can be resolved and worked into practices (albeit still a burden for the satellite operator), but it may be hindering more last-minute type arrangements where a satellite operator is looking for support from a ground station provider before launching, thereby impacting Australia's business competitiveness.

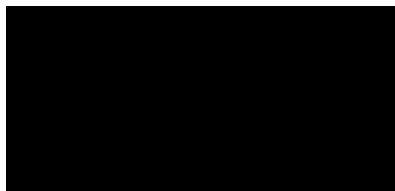
We recommend that ACMA consider mechanisms to accommodate partial non-alignment between licence applications and ITU filings, even if for non-renewable licences which can be revisited once plans and technical operating parameters firm-up.

### **Conclusion**

AWS appreciates the ACMA's efforts in engaging stakeholders and providing an opportunity to support the evolution of Australia's spectrum management strategy. The issues raised in this submission—license tax reform, and flexibility in alignment with ITU filings—represent practical steps the ACMA can take to support more efficient, equitable, and future-focused spectrum use across the communications sector.

Thank you for considering our submission. If you would like to discuss the matters raised in our response or need any further information, please let me know.

Yours sincerely,



Roger Somerville  
Head of Public Policy, Australia and New Zealand  
Amazon Web Services