

A close-up photograph of a person's hand holding a silver smartphone. The hand is positioned in the upper right quadrant of the image, with the thumb and index finger visible. The background is a dark blue, textured fabric, possibly a shirt. The lighting is soft, highlighting the contours of the hand and the metallic finish of the phone.

Review of the 2.5 GHz band spectrum licence technical framework

Submission to the Australian
Communications and Media Authority

7 July 2026

Recommendations

This submission recommends the Australian Communications and Media Authority:

1. Adopt the proposed changes to the 2.5 GHz band spectrum licence technical framework.
2. Provide further detail on forthcoming consultations for the Expiring Spectrum Licences process within the next Five-Year Spectrum Outlook.
3. Provide further detail on the proposed secondary licensing framework to address competition issues and the underutilisation of spectrum resources.
4. Include scientific and public-interest stakeholders within their review processes to ensure all uses for spectrum resources are considered and safeguarded.

About this submission

The Australian Communications Consumer Action Network (**ACCAN**) is pleased to provide this submission to the Australian Communications and Media Authority (**ACMA**) on the review of the 2.5 GHz band spectrum licence technical framework (**the Framework**). This submission welcomes the proposed changes to the Framework to enable fast, reliable delivery of new technologies at minimal cost to consumers and calls for greater clarity on future spectrum consultation processes, while continuing to engage with public-interest and scientific stakeholders.

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ACCAN is the peak national consumer organisation advocating trusted, accessible, inclusive, affordable and available communications and digital services.

1. Introduction

The ACMA has undertaken a review of the 2GHz band spectrum licence technical framework, proposing a series of updates to modernise it. These changes will enable the Framework to accommodate contemporary technologies that the existing framework cannot adequately account for, such as the deployment of 5G and Advanced Antenna Systems (**AAS**).

The 2.5 GHz spectrum band is a key component for Australia's mobile and wireless broadband services, being vital to the functioning of 4G and 5G services. The efficient use and implementation of this spectrum band has only become more important as consumer demand for mobile connectivity and data usage grows over time.¹

The adoption of new technologies, along with widely embraced international standards, will enable faster and more reliable implementation of 5G services across Australia at lower cost to both service providers and consumers.

ACCAN recognises that this review focuses on the specific technical framework applying to the 2.5 GHz band and that given the forthcoming Expiring Spectrum Licence (**ESL**) process provides opportunity for broader changes to the Framework, the proposed changes are limited in scope and relate only to the relevant technical framework.

We therefore limit our comments to the proposed technical reforms and the manner in which they were reached, while emphasising the need to prioritise improved consumer outcomes in any future changes to spectrum settings in the ESL process.

2. Background

ACCAN has actively engaged on spectrum policy throughout the ESL process, given the importance of these decisions to consumer outcomes now and into the future. ACCAN has consistently emphasised the importance of ensuring that spectrum policy settings treat spectrum appropriately and as a valuable and finite public asset. Spectrum policies should deliver long-term public value, promote effective competition, and support efficient and improved outcomes for all Australians, including those in regional, rural and remote (**RRR**) areas.

¹ Australian Communications and Media Authority, 'Trends and Developments in Telecommunications 2024–25 | ACMA' (February 2026) <<https://www.acma.gov.au/publications/2026-02/report/trends-and-developments-telecommunications-2024-25>>.

2.1. The proposed changes

The ACMA's review of the Framework proposes updates that enable the use of modern equipment while limiting potential impacts on services operating in adjacent bands.

The review proposes updating the Framework to incorporate standards from the 3rd Generation Partnership Project (**3GPP**), an international collaboration of telecommunications standardisation organisations that develops technical specifications for global mobile networks.² These new standards account for modern 4G and 5G wireless infrastructure, such as AAS, which are incompatible with the current framework due to their fully integrated design and lack of connection points between the radio unit and antenna that traditional radio systems use for measuring conducted power or emissions.

Among the proposed changes to the Framework is adopting Total Radiated Power as a measurement metric compatible with these new systems and updating transmitter power limits and unwanted emission requirements to account for the new metric and align more closely with 3GPP standards.

Of note, while these changes bring Australia closer into alignment with 3GPP standards, the ACMA has avoided broader changes to achieve even greater alignment, advising that such changes could be considered as part of the forthcoming ESL process. This approach has ensured that, despite adopting new metrics for measuring emissions, the proposed new limits for in-band emissions are effectively equivalent to the existing limits.

3. Review of the technical framework

3.1. Efficient use of spectrum and alignment with international standards

ACCAN welcomes the proposed amendments, which take a measured approach to modernising the Framework. They ensure the Framework remains fit for purpose, is able to support the operation of newer 5G and AAS technologies, and the adoption of metrics that bring Australian practices closer in alignment with international 3GPP standards.

Adopting proven and widely implemented international standards can reduce the need for bespoke equipment for the Australian telecommunications landscape, lowering input costs for network providers and supporting efficient network deployment.³

² 3GPP, 'The 3rd Generation Partnership Project' <<https://www.3gpp.org/about-us>>.

³ OECD, 'The Road to 5G Networks: Experience to Date and Future Developments' [2019] *OECD Digital Economy Papers* 31 <https://www.oecd.org/en/publications/the-road-to-5g-networks_2f880843-en.html>.

3.2. Preservation of critical services and scientific research

ACCAN welcomes the inclusion of the Bureau of Meteorology and the Commonwealth Scientific and Industrial Research Organisation (**CSIRO**) in the technical liaison group that provided advice for this review. Spectrum is a vital public resource, not only for telecommunications services but also for essential public services and scientific research, such as weather forecasting, aviation, radio astronomy, and environmental monitoring.⁴ As technologies evolve and frameworks adapt to accommodate them, the operation of these services must be accounted for and safeguarded into the future.

The inclusion of these bodies demonstrates acknowledgment of the critical nature of these services, the role they play in this space, and the important contribution they can make to spectrum settings. ACCAN encourages the ACMA to continue engaging the Bureau of Meteorology, the CSIRO and other relevant scientific and public-interest stakeholders in future reviews to ensure the effective and efficient implementation of spectrum resources.

3.3. Forthcoming consultations

This review deferred consideration of greater alignment with 3GPP standards to the forthcoming ESL process, and the ACMA intends to commence consideration of the Framework that would apply to renewed licences in Q1 2027. However, at present, there remains limited public information regarding the expected timing and scope of future consultations.

Spectrum licensing decisions shape the long-term development of Australia's communications infrastructure and are important to consumer, competition and coverage outcomes. Accordingly, stakeholders must be provided with greater clarity on forthcoming spectrum consultation opportunities through the 2026-2031 Five-Year Spectrum Outlook (**FYSO**) and other channels.

In addition, ACCAN calls for more information and further exploration of the ACMA's proposed secondary licensing framework to address competition issues and the underutilisation of spectrum resources. As the ACMA has stated, a secondary licence framework could '*provide targeted solutions that are designed to address entrenched policy issues, such as connectivity in remote areas and in First Nations communities*' and '*allow prospective alternative licensees to apply directly to the ACMA for spectrum access*'.⁵

⁴ Australian Communications and Media Authority, 'Review of the 2.5 GHz Band Spectrum Licence Technical Framework' (June 2026) 20–22 <<https://www.acma.gov.au/consultations/2026-06/review-25-ghz-band-spectrum-licence-technical-framework>>.

⁵ Australian Communications and Media Authority, *Expiring Spectrum Licences - Views on Alternative Licensing Conditions* (March 2025) 19–20 <<https://www.acma.gov.au/sites/default/files/2025-03/ESL%20-%20ACMA%20report%20on%20alternative%20licensing%20conditions.pdf>>.

A secondary licence framework does have the potential to address these issues. However, its efficacy would rely heavily on its implementation, and, of course, on whether it is implemented at all. The draft for the ACMA's next FYSO advises that the ACMA are '*continuing to consider the merits of a secondary licensing framework*' but provides no further details on the topic.⁶ Increased priority should be given to the consideration of this framework, as delays to its implementation could result in missed opportunities to close the digital divide and improve the quality of telecommunication services for Australians, particularly those in RRR areas. Consideration of timing, scope, stakeholders and potential implementation paths for this framework should occur within the next FYSO.

ACCAN would welcome greater clarity on upcoming consultations relevant to the 2GHZ MSS band given their importance to the implementation of the Universal Outdoor Mobile Obligation and the critical impact this changing technology will have on consumer outcomes.

4. Conclusion

ACCAN supports the ACMA's proposed updates to the Framework, as well as measures to modernise it and enable the deployment of new technologies critical to the future of telecommunications in Australia, in a manner that aligns with international standards and best practices.

The continued inclusion of expert bodies in these review processes is critical to ensure all possible repercussions and externalities across all affected sectors are considered and addressed.

In order to provide greater clarity for all stakeholders and transparency in the ESL process, ACCAN calls on the ACMA to provide further details on expected scope and timelines for forthcoming spectrum consultations in the next FYSO, and to provide further information on the proposed secondary licensing framework to ensure effective competition and efficient allocation of spectrum resources in Australia.

The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples.

⁶ Australian Communications and Media Authority, 'Draft Five-Year Spectrum Outlook 2026–31' (March 2026) 14 <<https://www.acma.gov.au/consultations/2026-03/draft-five-year-spectrum-outlook-2026-31>>.



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