Australasian Railway Association

# Submission

## The Australian Communications and Media Authority (ACMA)

## Five-year spectrum outlook 2026-31 and 2026-27 work program

## Draft for consultation

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**May 2026**

ABN: 64 217 302 489

Australasian Railway Association

# The ARA

The Australasian Railway Association (ARA) is the peak body for the rail sector in Australia and New Zealand, and advocates for more than 220 member organisations across the industry.

Our membership covers every aspect of the rail industry, including the:

- passenger and freight operators that keep essential rail services moving;
- track owners, managers, and contractors that deliver a safe and efficient rail infrastructure network; and
- suppliers, manufacturers, and consultants that drive innovation, productivity, and efficiency in the rail industry.

Our members are driven to support vibrant, sustainable and connected communities through greater use of rail across Australia and New Zealand. We bring together industry and government to help achieve this ambition.

Our advocacy is informed by an extensive research program to ensure we offer solutions that are grounded in evidence and focused on delivering tangible value in our daily lives.

The rail industry has a crucial role to play in the region's sustainable development and growth and offers meaningful and rewarding careers for tens of thousands of people in the regions.

Our significant program of work is focused on supporting a strong advocacy agenda, and creating opportunities for the rail industry to network, collaborate and share information, and maximise the benefits we have to offer the wider community.

The ARA thanks the Australian Communications and Media Authority for the opportunity to make this submission, which has been developed in consultation with ARA member organisations.

Any questions regarding this submission should be directed to [redacted], Executive Officer – Projects & Membership via [redacted]

# Australia's Rail Industry

Rail is a significant industry in Australia, creating economic activity through its operations and capital investments. It is an industry with activities across every major metropolitan and regional area and is supported by the full spectrum of skills in the Australian workforce.

In 2024, the rail industry contributed around $39 billion to the Australian economy and employed more than 196,000 workers (directly and indirectly in full-time equivalent terms, FTE). There is currently $162 billion of investment in rail civil construction and maintenance projects forecast over the next 10 years.

# Railway response

The ARA welcomes the opportunity to provide the following information to the ACMA's consultation – *Five-year spectrum outlook 2026-31 and 2026-27 work program Draft for consultation.*

**Regarding Part 1: Five-year spectrum outlook 2026-31 and Overview**

The ARA supports the ACMA's goals on productivity and investment through the delivery of national rail interoperability where the 1800 MHz spectrum is critical for enabling delivery. The ARA notes members have stressed long-term access to the 1800 MHz band as essential to achieving these objectives for the rail industry. As outlined in the ARA submission for Expiring Spectrum Licences Preliminary Views Stage 3, stranded assets due to premature migration of rail mobile radio systems from the 1800 MHz band to 1900 MHz band would be counterproductive to these national objections. Therefore, the ARA and its members support the ACMA's continued consideration of the 1800 MHz band for rail uses in the spectrum outlook and further engagement activities towards delivering the outcomes of the national objectives.

***Allocation and Licensing***

The ARA and its members support ACMA's approach in considering the impact to consumers and industry as precedence over the use of auctions to determine spectrum allocation. The ARA recommends ACMA expand this rationale to include public interest overall.

The ARA's members highlighted that public interest includes maintaining a safe, efficient and affordable freight and passenger transport system, avoiding government overspending on unnecessary reinvestment over existing infrastructure, and providing service continuity as a major contributor towards Australia's supply chain network. The 1800 MHz spectrum is a fundamental element to sustain our national capability.

Additionally, the ARA's members consider work related to Radio Navigation-Satellite Services (RNSS) in tunnels (as well as other applications), to be of significant interest and encourages the ACMA to continue efforts in developing standards and suitable licences for operation of this class of system.

***International influences***

The ARA's members support the ACMA's monitoring of international developments and leveraging technical specifications and standards for radiocommunications technologies, such as the Rail Mobile Radio (RMR), developed by international bodies for use domestically.

***Private Networks***

The ARA's members highlighted that some private networks are not suited to high frequency bands. For example, public transport services require coverage over large areas which are note suited to high frequency bands.

The ARA's members highlighted some private networks will need to support roaming, or similar mechanisms, enabling devices to connect to other public and private networks in provisions of critical public transport services.

The ARA's members expressed concerns that it may be difficult for some private networks to obtain necessary mobile network codes and national numbers necessary for interoperability with other private and public networks.

***Spectrum for government requirements***

The ARA's members support the use of spectrum for governments to provide public transport services and notes that the ACMA acknowledges governments' need for spectrum.

The ARA's members reiterated that the continued long-term allocations of 1800 MHz band is a key factor to deliver commitment towards zero emissions, avoiding:

- Uncontrolled and untimely disruptions that can cripple the continuity of freight and passenger transportation services delivered to the benefit of public and threaten Australia's supply chain.
- Significant waste and e-waste from disposal of non-expired infrastructure assets and equipment.
- Significant redesign, reinvestment, and reconfiguration of equivalent infrastructure contrary to national productivity initiatives.

The ARA's members identified that they expect their use of private and public networks to increase, as new transport routes are established and the need for radiocommunications connectivity between vehicles and stationary infrastructure – including signals and level crossings – is deployed to reduce crashes and improve safety.

The ARA recommends that the ACMA maintains a proactive engagement with rail and other transport authorities.

**Regarding Part 2: 2026-27 annual work plan**

**Long-term use of the 1800 MHz band**

The ACMA intends to commence consideration in Q4 2026 of the long-term use of the 1800 MHz frequency bands currently allocated to Australian railways across Victoria, New South Wales, Queensland, South Australia, and Western Australia.

The ARA understands that, in its paper "Preferred Views on ESL Frequency Bands and Licensing Arrangements," the ACMA's preliminary position not to support long-term rail access to this spectrum is based on perceived uncertainty regarding the future delivery of rail services. This uncertainty arises from a lack of confirmed timelines for the availability and deployment of FRMCS on 5G infrastructure, including rail-specific onboard equipment, as well as unclear future bandwidth requirements associated with this technology and the rollout of ETCS on high-density metropolitan networks.

The ARA's position is that this uncertainty should not justify limiting long-term access to the 1800 MHz band. On the contrary, it supports maintaining rail's access until there is clear evidence that a transition to alternative spectrum can be achieved effectively and without risk to operations.

The ACMA has also indicated its intention to assess whether rail services could be supported by the 1.9 GHz band in the long term. However, the ARA does not expect that materially new information will be available by Q4 2026 beyond what has already been provided through the ESL consultation process. If this assessment proceeds in the absence of additional evidence, the ARA is concerned that the rail sector may be placed at a disadvantage, particularly given the ACMA's demonstrated tendency to interpret information gaps as a basis for restricting long-term spectrum access.

With FRMCS standards and equipment still under development, the ARA requests that the ACMA extends the 1800 MHz planning works to allow the rail industry sufficient time to provide meaningful contributions.

**Outcome of review of 1800 MHz band spectrum licence technical frameworks**

The public consultation on the review of the 1800 MHz spectrum licence technical frameworks included some detail regarding proposed apparatus licensing arrangements for rail services within the 1800 MHz band.

However, it remains unclear whether the outcomes of this consultation will lead to amendments to RALI MS34, or whether any such changes will be addressed through a separate consultation process. The ARA requests that the ACMA clarify this point and include any activities to amend the RALI MS34 in the FYSO.

It is also unclear whether RALI MS34 will limit rail to apparatus licences supporting current-generation technologies, or whether licensees will be permitted to apply for 1800 MHz apparatus licences to support 5G networks. The ARA requests clarification from the ACMA on this matter.

The ACMA has indicated that it plans to finalise updates to the 850 MHz and 1800 MHz spectrum licence technical frameworks in Q2 2026, ahead of the ESL renewal application period. However, it has not indicated that it will finalise the 1800 MHz apparatus licence framework before the renewal application period begins. The ARA requests clarification from the ACMA on this matter.

**Absence of progression of 1.9 GHz technical frameworks and licencing arrangements for rail**

The work program does not indicate whether the ACMA will continue progressing the development of technical frameworks and licensing arrangements for rail use of the 1.9 GHz band. The ARA requests that this work be continued, as it is critical to informing planning activities by Queensland Rail, the Suburban Rail Loop Authority, and High Speed Rail, all of whom require greater certainty regarding the risks and costs associated with deploying new radio systems using this spectrum.

The ARA notes that the previous FYSO, in Table 1, indicated that ACMA would "commence the allocation process (subject to the timing of outcomes of technical framework and allocation instrument consultations)" for the 2 GHz MSS

(1980–2010 MHz and 2170–2200 MHz) and 1.9 GHz (1880–1920 MHz) bands in Q2 2026. We understand that these activities may be running behind schedule; however, we expect updated target dates to be provided in the new FYSO.

Although the ACMA mentions, briefly, in a single sentence, that it is developing arrangements for rail services in the 1.9 GHz band, the paper offers no detail on when these arrangements are expected to be completed. The ARA members have requested the 1.9 GHz framework to be finalised as a priority.