NSW Government Submission

Five Year Spectrum Outlook 2026-31

May 2026

Introduction

This NSW Government submission has been prepared jointly by the NSW Telco Authority (NSWTA), Transport for NSW (TfNSW) and the Department of Primary Industries and Regional Development (DPIRD). The NSW Government appreciates the opportunity provided by the Australian Communications and Media Authority (ACMA) to comment on the five-year spectrum outlook 2026–31 (FYSO) and 2026–27 work program.

The NSW Government supports the work of the ACMA to periodically review spectrum allocations and technical frameworks that provide access to spectrum for non-commercial public services such as public safety, transport, including rail safety, operation and control communications.

As previously advised, the NSW Government asserts that public safety and essential government services should be awarded a higher priority in spectrum allocation and/or management decisions.

As the NSW Government's requirement for spectrum continues to grow, equating the spectrum interests of states and territories with commercial licensees without due regard to the importance of public safety and essential service delivery has resulted in public safety services at risk of being left in spectrum deficit, especially with respect to operational communications and emergency response.

Given the complexity of the current system, securing spectrum for essential government services will become harder. We therefore recommend that the ACMA review its approach to spectrum management and licencing so that public safety is given priority over commercial purposes to secure the future delivery of essential government services. In this respect, the NSW Government agrees with our Victorian counterparts that this could be achieved through legislative and/or regulatory changes that prioritise spectrum and ensure its affordability for public safety and essential government services and actively plan for expected growth in demands for spectrum for these purposes.

The key points in this submission are made under the two headings of 'Spectrum for government requirements' and 'Regional connectivity', with the following subheadings:

- Spectrum for government requirements
  - Enhanced engagement with states and territories
  - Pricing for essential government services
  - Spectrum licence conditions for public safety
  - Rail spectrum (1800 MHz and 1.9 GHz)
  - 4.9 GHz for public safety
  - Intelligent transport systems
  - Emerging aviation technologies
  - Private networks
- Regional connectivity
  - Secondary licensing framework and spectrum sharing
  - Expiring spectrum licences (ESL): From policy intent to enforceable conditions
  - Universal Outdoor Mobile Obligation (UOMO) implementation: the case for an accelerated timeline

Spectrum for government requirements

The NSW Government appreciates the ACMA's acknowledgement that some government spectrum needs warrant additional considerations and regulatory arrangements. The NSW Government has asserted in several submissions, including submissions to the FYSO 2024-29 and FYSO 2025-30, that spectrum is essential to government service delivery and its allocation must be prioritised over commercial interests. We reiterate in this submission that there needs to be special consideration of essential government services embedded into ACMA's spectrum management processes.

Commercial operators have commercial interests as a primary focus while governments are established to provide for the people with public funds. Governments are not geared to compete with commercial organisations as they must follow annual budget processes with high levels of accountability required of planned expenditure of public funds. If the Commonwealth does not support state and territory government services with special consideration of their spectrum requirements, then the outcome will be inadequate services for the public with less value for tax dollars.

Spectrum is a critical resource for government, enabling the delivery of a range of essential government services that keep people and places safe, provide affordable public transport options and manage power, water and waste. If continuing access to spectrum is not safeguarded, the ability of state and territory governments to deliver these critical services would be severely affected. For example, as new transport routes are established, radio communication connectivity between vehicles and stationary infrastructure, including signals and level crossings, will be required to reduce accidents and improve safety. Effective management and allocation of spectrum for government services is needed to maximise its benefits across these sectors for the people of NSW.

This requires prioritisation of state and territory government requirements for spectrum to support public safety through essential government services now and into the future and that guaranteed, affordable access to spectrum for state and territory governments should take precedence over commercial interests.

Enhanced engagement with state and territory governments

The NSW Government seeks more active collaboration and early involvement in strategic planning with the ACMA regarding spectrum needs for essential government services. While the ACMA actively consults on a wide range of spectrum related topics, when consultations are released the ACMA's positioning is advanced, and together with the relatively short consultation timeframes, there is limited opportunity for state and territory governments to prepare a meaningful and/or collective (state-wide or multi-jurisdictional) response to each relevant consultation.

The NSW Government appreciates the ACMA's recent discussions with some of our key agencies regarding spectrum and other issues. However, we reiterate that a more structured engagement approach would be beneficial to state and territory government service provision.

The NSW Government requests a regular and ongoing Commonwealth-led state and territory forum to allow for more effective consultation and input from state and territory governments. The forum would have a strategic policy focus and would enable influence early in ACMA's planning stage. This approach was endorsed by state and territory governments in the Spectrum Working Group Options Paper which was presented to the Regional Connectivity Ministers' Roundtable (RCMR) on 23 October 2024.

This approach would provide the following benefits:

- Facilitate early and better understanding of both ACMA and state and territory priorities and support improved planning for spectrum requirements to meet the needs of public safety and essential government services.
- Recognise that state and territory governments operate differently from, and perform separate but critical functions, to commercial entities, so should be treated differently in spectrum allocation processes.
- Greater collaboration and/or alignment between the Commonwealth, states and territories in determining most suitable approach for spectrum licensing, management and pricing for essential government services.
- Finally, closer collaboration with the ACMA can provide state and territory governments with more allocative certainty and support appropriate investment of public funds in spectrum for essential government services.

Pricing for essential government services

Acknowledging the importance of commercial services, including providing critical services such as Triple Zero and other life-saving information transmission services, spectrum allocation decisions should not be geared to achieving the highest financial returns at the expense of taxpayers. Instead of competing with commercial entities in open auctions, the NSW Government recommends that a separate approach be adopted in relation to the pricing of spectrum for essential government services.

Alternatives to market based competitive processes were identified in the Spectrum Issues Paper for the RCMR and included cost recovery pricing and options to pay licence fees in instalments to ensure low cost-high certainty access to spectrum for essential government services. These alternatives represent the unified voice of state and territory governments seeking support from the Commonwealth to deliver vital essential services.

Cost recovery pricing, where government users only pay the administrative and regulation cost components of a spectrum licence price (i.e. licence tax and service charge), provides price certainty and would reduce the financial burden for state governments.

This pricing model recognises the unique value of government spectrum usage for delivery of not-for-profit public services. Given that they deliver a significant public benefit, the impact to the taxpayer should be minimised along with the cost burden for other state government services that exist with current pricing arrangements. The benefit of this model is that it ensures price certainty and supports more informed internal state government budget planning.

To align spectrum fees with state and territory planning and budget cycles, payments by instalment would mitigate the need for significant upfront payments for licences.

Licence conditions for public safety

Acknowledging that implementation of a fully operational Australian Public Safety Mobile Broadband (PSMB) will take time to complete, there are conditions on mobile networks that can be applied to facilitate data-enabled operational communications of Emergency Services Organisations (ESOs) within a short timeframe.

Emergency services worldwide now rely on broadband data as much as voice to keep first responders and communities safe. ESOs need secure, prioritised broadband for operational communications, situational awareness and emerging technologies that can mean the difference between life and death.

Market forces alone have failed to deliver this capability. Without enforceable conditions, Mobile Network Operators (MNOs) will continue to prioritise commercial traffic over public safety, leaving first responders without the connectivity they need to protect lives and property.

The *Radiocommunications Act 1992* aims to promote the long-term public interest by managing spectrum for defence, national security, and non-commercial purposes, including public safety. This intent should be strengthened through enforceable conditions that prioritise emergency communications and guarantee interoperability and resilience. These measures ensure seamless, reliable connectivity during disasters, when every second counts.

With these conditions in place, ESOs can rely on uninterrupted connectivity, enabling stronger emergency management within a regulatory framework that safeguards national security and public safety.

The cost of inaction

Spectrum is a finite national resource. If mobile networks continue to operate without such conditions, the government effectively neglects a pathway to ensure effective operations of public safety and emergency communications.

In the absence of clear obligations, governments may find themselves needing to negotiate special access agreements or pay additional costs for priority access, roaming, or temporary increased capacity. Taxpayers could end up funding what might have been secured upfront through enforceable conditions.

Recommended enforceable conditions

While acknowledging that implementation options and metrics will require technical consultation with stakeholders including MNOs, the NSW Government proposes that the following conditions are applied to carrier licences of all MNOs:

Quality, priority and pre-emption (QPP)

- ***Quality of Service (QoS)*** – ensuring emergency services communications (including voice, video, and data) are delivered reliably and quickly, even when the network is congested.
- ***Priority*** – ensures higher-tier emergency services users always get priority access to the network and that their communications are always at the front of the queue ahead of regular users (except for Triple Zero calls).
- ***Pre-emption*** – if the network is congested, it can automatically free up space by pausing or dropping lower-priority traffic to make room for emergency communications.

Domestic roaming for ESOs

Emergency services personnel should have domestic roaming that is always on to connect to alternative networks whenever their main network is unavailable or has poor coverage.
Always-on domestic roaming for emergency services should not involve any roaming fee or charge.

Always-on domestic roaming enables:

- Greater coverage, especially in regional and remote areas.
- Improved resilience – if one carrier's network is down or severely congested, another can be used.

Transparency

We note that most of the information about outages required for improved transparency is provided via the *Telecommunications (Customer Communications for Outages) Industry Standard 2024* (CCO Standard). However, NSWTA is always willing to work with the ACMA regarding any possible improvements.

Getting the right data as quickly as possible enables agencies like NSWTA to rapidly respond to network outages, providing the required, targeted support. This data is vital for first responders for situational awareness before entering into areas experiencing outages.

Resilience standards

MNOs should meet defined minimum power redundancy requirements at base stations to maintain reliability during emergencies.

They should also complete an agreed Bushfire Risk Mitigation assessment (based on Commonwealth Scientific and Industrial Research Organisation (CSIRO) research) for all mobile tower sites in bushfire-prone areas at least annually and implement relevant measures, such as replacing shelters with outdoor units, installing heat shields, and managing vegetation and other nearby third-party fuel sources.

Current non-regulatory initiatives, such as A Pathway to Infrastructure Resilience, offer improvements but depend on voluntary carrier participation, limiting adoption. In contrast, implementing a licence condition would harden sites and increase the likelihood they remain operational when most needed.

Rail spectrum (1800 MHz and 1.9 GHz)

National rail interoperability supports passenger and freight movements, providing the backbone to a major portion of Australia's supply chain, and greater use of rail services supporting the national objectives of decarbonization, productivity, and investment. 1800MHz spectrum is a critical enabler for national rail interoperability.

The NSW Government considers long-term access to the 1800 MHz band is essential to achieving these objectives for the rail industry. As outlined in the Australasian Rail Association (ARA) submission for Expiring Spectrum Licences – Stage 3, stranded assets due to premature migration of rail mobile radio systems from the 1800 MHz band to 1900 MHz would be counterproductive to these national objectives. Accordingly, the NSW Government stresses that both the 1800 MHz and 1900 MHz allocations will be required for rail operations for several years into the future.

In addition to the Digital Train Radio System, valued in the order of $1B and outlined in the ARA's ESL Stage 3 submission, there have been press announcements of further investments in NSW for approximately $11.5B for Metro, and $93B for High-Speed Rail projects. These investments have significant dependency on the long-term availability of the 1800MHz.

The NSW Government asserts that the continued long-term allocation of 1800MHz 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 NSW Government supports TfNSW's preference to retain 1800MHz rail spectrum under spectrum licences rather than apparatus licences. Retention of 1800MHz for rail use remains within TfNSW's long-term strategy to deliver safe, efficient, and affordable transportation in alignment with the highest public interest, gaining the greatest value from the significant investment of public spending in 1800MHz-specific infrastructure and equipment. TfNSW's continued ability to deliver affordable transportation to maximise public benefit is heavily reliant on the long-term availability of the 1800MHz rail spectrum licences at public interest prices.

Notwithstanding TfNSW's preference to continue 1800MHz access via spectrum licence, there are also concerns over the apparatus licensing framework that is scheduled "later in 2026". There is a high likelihood that the publication of this framework will occur after the commencement of spectrum licensing applications in June 2026. This can generate uncertainty for stakeholders and inhibit the ability to make informed decisions over the suitability of apparatus licensing for their needs.

The NSW Government has previously raised concerns regarding the timelines for the expiring spectrum licence process and the potential risks for railway operators in relation to investment milestones and government budget cycles. The risks are exacerbated by the immature development of Future Railway Mobile Communication System (FRMCS) standards and equipment, meaning that the rail industry will not have the necessary information available by Q4 2026 to provide meaningful contribution to the 1800MHz planning work. Accordingly, the NSW Government requests that the ACMA defers this planning work to Q4 2027.

The NSW Government requests that the 1.9 GHz framework be finalised as priority, to enable its proof-of-concept testing and development of the next generation of Rail Mobile Radio (RMR) business case.

4.9 GHz for public safety

We note that the ACMA is monitoring 4 GHz (4400–4990 MHz), which includes the spectrum under the *Radiocommunications (Public Safety Emergency Response) Class Licence 2023* (PSER Class Licence) of 4.94 GHz to 4.99 GHz.

With international interest for commercial wireless broadband (WBB) use in all or part of the broader 4400–5000 MHz band and the growing interest for use of the band for commercial services in Australia, the NSW Government wishes to reiterate the importance of retaining the 50 MHz (4.94 GHz to 4.99 GHz) under the PSER Class Licence for public safety purposes.

NSW Police Force (NSWPF) is the most prevalent user of 4.9 GHz under the PSER Class Licence and states that at least one channel will be used for 2-3 hours daily. Common uses are for wideband air to ground wireless communication (aircraft to fixed and portable ground receiver stations) and fixed point to point and mesh networks services to support major events and critical incident responses. NSWPF strongly supports retaining the band for public safety purposes.

Other agencies in NSW, in particular the State Emergency Service (SES), use 4.9 GHz for mesh systems for rescue missions that take place beyond commercial network coverage, such as in caves, tunnels and valleys of heavy vegetation.

NSWTA is in the process of commissioning research to gain a better understanding of ESO use of the band across NSW so that we can work toward encouraging more ways to use the band and more efficient use. To enable this approach, our research may lead to development of band management strategies that the NSW Government intends to share with the ACMA when available.

Intelligent transport systems

The NSW Government supports monitoring of cooperative intelligent transport systems (C-ITS) and linking Australian developments to EU developments and European Telecommunications Standards Institute (ETSI) standards.

TfNSW expects that there will be significant developments in relation to the C-ITS in the next five years which will likely warrant a review of the ACMA's approach to ensure it can support the deployment of C-ITS technology in Australia and deliver information between connected vehicles, infrastructure and the network in a secure, reliable and timely manner.

Emerging aviation technologies spectrum regulation

The NSW Government acknowledges ACMA's ongoing efforts to monitor the current and future implications of spectrum and licensing requirements for drones and Advanced Air Mobility, in line with international developments in spectrum management.

The NSW Government, along with other states and territories, foresees increasing use of drones to support our operational and communications requirements. Examples include drones used to provide surveillance of large fires to support emergency management operations, and drone technology used by TfNSW to monitor road traffic and major events, enhancing incident response efficiency and augmenting the management of major events in NSW.

The NSW Government seeks ongoing consultation to form an agreed approach to the related regulatory and licensing mechanisms.

Private Networks

While ACMA states that "millimetre wave (mmWave) spectrum in the 26 and 28 GHz bands and mid-band spectrum categories in the 3.4–4.0 GHz band are especially well suited" for use of WBB for private networks, the NSW Government notes that some government operated private networks, such as the Public Safety Network (PSN) and public transport networks, require large coverage areas that require use of lower frequency bands.

The NSW Government highlights that some private networks will need to support roaming, or similar mechanisms, enabling devices to connect to other public and private networks in provision of critical public transport services. The NSW Government trusts that the ACMA will support access to mobile network codes and national numbers necessary for interoperability with other private and public networks as required.

Additional point regarding RNSS

As an additional point, we note that work regarding Radio Navigation-Satellite Services (RNSS) is not included in the work program this year. TfNSW considers work related to 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 systems.

Regional Connectivity

The draft FYSO 2026-31 addresses a pivotal period for regional spectrum policy. The convergence of the ESL renewal, the UOMO implementation, place-based secondary licensing, and maturation of satellite D2D technology creates a once-in-a-decade opportunity to reshape spectrum access in regional Australia. The Australian Government's response to the 2024 Regional Telecommunications Review, adopting all 14 recommendations on improving rural and regional connectivity, reinforces both the urgency and the political mandate for action.

Through the Regional Digital Connectivity Program, the NSW Government is investing in the delivery of new mobile and broadband infrastructure across regional NSW. This investment is not abstract: it has been deployed into towers, backhaul, and shared infrastructure across regional NSW, and it has produced direct operational evidence of where spectrum access barriers are actively constraining connectivity outcomes.

The NSW Government has been a long-term advocate for mechanisms such as the proposed secondary licensing framework and spectrum sharing to support regional connectivity and we have provided an outline of our views below.

In addition, the NSW Government strongly supports the progression of the UOMO that will greatly improve outdoor coverage to more remote and rural areas that have experienced low or no coverage for many years. The NSW Government has provided a submission to the consultation on the UOMO and we have included some comments below about accelerating the timeline for UOMO implementation.

The NSW Government makes the following recommendations in relation to regional connectivity:

- operationalise the ESL Ministerial Policy Statement 2024 (MPS) regional connectivity objective by attaching measurable deployment conditions to renewed 850 MHz and 1800 MHz licences, supported by geographically differentiated pricing
- accelerate the place-based secondary licensing framework from 'ongoing' to a defined 2026–27 deliverable, with a consultation paper published by Q2 2027
- bring forward the UOMO work program from Q3 to Q2 2026, maximising the implementation window before the December 2027 commencement; and
- design the 2 GHz Mobile-Satellite Services (MSS) allocation to enable participation by regional satellite operators and preserve the shared narrowband Internet of Things (IoT) set-aside as a model for future bands.

Secondary licensing framework and spectrum sharing

The NSW Government acknowledges the ACMA's exploration of potential opportunities to enable third party access to spectrum included in spectrum licences in areas where incumbent licensees have not deployed services and is unused. NSW Government continues to advocate for the use of a place-based secondary licensing framework which could enable third parties to apply for licences to deliver localised connectivity solutions in areas where there is limited commercial incentive for incumbents to provide services.

The NSW Government regards the development of a place-based secondary licensing framework as highly important for regional connectivity. The framework would enable third-party access to spectrum included in spectrum licences where incumbents have not deployed services. In much of regional NSW, incumbent licensees hold exclusive spectrum rights across geographic licence areas covering tens of thousands of square kilometres with negligible or zero utilisation. There is currently no regulatory pathway for alternative providers to access this underutilised spectrum.

It is recommended that the ACMA accelerate the place-based secondary licensing work item from 'ongoing' consideration to a defined deliverable within the 2026–27 program, with a consultation paper by Q2 2027. The draft FYSO's commentary on non-traditional spectrum sharing, including database-driven models such as Automatic Frequency Coordination and the US Citizens' Band Radio Service (CBRS), demonstrates that the technical tools exist. However, there appears to be a limited domestic regulatory framework that applies these proven models to the Australian regional context.

The NSW Government's Regional Digital Connectivity Program has shown that shared mobile infrastructure results in shared-access outcomes are achievable where spectrum and infrastructure policy are aligned. Place-based secondary licensing would extend this logic from infrastructure sharing to spectrum access.

The growing uptake of private networks in sectors including agribusiness, transport, logistics and utilities reinforces the urgency. These applications are directly relevant to regional NSW's economic base, where agriculture, mining, and freight logistics depend increasingly on connected sensors and autonomous systems. The place-based secondary licensing framework, combined with area-wide licences (AWLs) and class licensing arrangements, would materially expand spectrum access for agricultural IoT, precision farming, and bushfire monitoring — applications where the absence of spectrum access is the primary barrier to deployment, not the absence of demand.

Expiring Spectrum Licences: From Policy Intent to Enforceable Conditions

The renewal of 850 MHz and 1800 MHz spectrum licences is a highly consequential spectrum decision for regional Australia in the outlook period, with application windows opening 18 June 2026 and existing licences expiring 17 June 2028. The ESL MPS includes 'connectivity and investment in regional and remote areas to deliver improved services to end users' among its five communications policy objectives.

This objective is not sufficiently operationalised in the draft FYSO's ESL work program.
The sub-1 GHz spectrum in the 850 MHz band is foundational to regional mobile coverage. Its propagation characteristics allow a single base station to cover areas that would require multiple higher-frequency sites, making it the only economically viable path to mobile service in low-density areas. Enforceable conditions should be attached to renewed licences to reduce the risk that the next licence term will replicate the pattern of the current one, with a metropolitan concentration of spectrum use and negligible regional utilisation.

It is recommended for the ACMA to provide enforceable conditions to the ESL MPS regional objective by incorporating measurable regional deployment benchmarks, such as minimum population coverage thresholds or rollout milestones tied to geographic licence areas, into the conditions attaching to renewed 850 MHz and 1800 MHz licences. The simplified pricing methodology for ESL valuations should also reflect the commercial asymmetry between metropolitan and regional spectrum use. Geographically differentiated pricing applying lower per-MHz charges in geographic licence areas where deployment costs are high and commercial returns are low, would reduce the effective cost of regional spectrum holdings and incentivise deployment without creating barriers to participation in the renewal process.

UOMO Implementation: The Case for an Accelerated Timeline

The draft FYSO's retention of the 1800 MHz and 2 GHz bands (outside spectrum-licensed areas) at the preliminary replanning stage is appropriate given growing interest in D2D services. The UOMO Bill, with default commencement on 1 December 2027, will require Optus, Telstra and TPG Telecom to ensure baseline outdoor mobile coverage (SMS and voice) is reasonably available across Australia, with Low Earth Orbit (LEO) satellite D2D expected to be a primary delivery mechanism in regional areas where terrestrial infrastructure is uneconomic.

The ACMA plans to publish its UOMO work program in Q3 2026. This work program should be brought forward to Q2 2026. With the UOMO commencing in December 2027, the window for carriers to negotiate D2D service agreements, conduct regional trials, and resolve spectrum coordination issues is already compressed. A Q3 2026 publication date reduces the likelihood that UOMO coverage in regional NSW will be operational at commencement.

Regarding the 2 GHz mobile satellite service allocation, the ACMA plans to consult on draft allocation instruments in Q2 2026 and commence the allocation process in Q4 2026. Given the significance of this band for satellite IoT and D2D services in regional Australia, the ACMA should prioritise allocation design features that support regional deployment. Specifically, IoT configurations should be sized to encourage participation by smaller or regional-focused satellite operators, not only by the three incumbent MNOs. The 2 × 5 MHz dedicated to shared narrowband satellite IoT is a sound design feature that should be preserved. The ACMA should consider whether similar set-asides are warranted in other satellite-relevant bands to ensure that narrowband IoT services that are critical for agricultural and environmental monitoring in regional Australia are not crowded out by broadband allocations.

In addition, the NSW Government has concerns that section 12K of the UOMO Bill allows for circumstances where there is only one primary universal outdoor mobile provider (PUOMP). This presents a risk that having only one PUOMP does not meet the intent of the UOMO, which is to ensure baseline mobile coverage is reasonably available outdoors to all people in Australia on an equitable basis.

Allowing for only one or two PUOMPs in a given area means that customers of the other MNOs will not have coverage in that area. In such circumstances, coverage would be available only to customers of the designated PUOMP/s, rather than on an equitable basis. This issue affects not only residents of the relevant area, but also people travelling into the area who are not customers of the designated PUOMP/s.

The NSW Government requests clarification on how this gap in equitable coverage will be addressed. In its October 2025 submission, NSWTA suggested that this gap can be addressed by including a requirement in the Bill for each PUOMP to enable mobile roaming to customers of other networks on demand.

For example,

- A TPG customer is travelling to Town A, where Telstra is the only PUOMP.
- If there is no coverage for the TPG customer in Town A, Telstra should be required to offer roaming to that customer, thereby ensuring coverage.

Under this approach, roaming would be available at all times yet would be activated by the customer if they choose to use the service, potentially for a set fee. The NSW Government suggests that a pricing schedule for domestic roaming should be recommended by the Australian Competition and Consumer Commission to ensure fair and reasonable rates, while maintaining incentives for ongoing regional investment by mobile operators.

In terms of public safety, mobile roaming will ensure that anyone travelling into an area where their provider does not have coverage can still contact people important to them, family, friends, and essential services. However, the NSW Government asserts that any roaming requirement introduced through the Bill should apply only to mobile telecommunications services delivered under the UOMO. Existing arrangements for roaming for Triple Zero calls should remain unchanged and not be subject to amendments of this Bill.