OPTUS



Submission in response to ACMA's draft Five-year spectrum outlook 2026-31 and 2026-27 work program

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EXECUTIVE SUMMARY

Optus welcomes the opportunity to provide feedback on the Australian Communications and Media Authority (**ACMA**) draft five-year spectrum outlook 2026-31 and 2026-27 work program.

Optus remains supportive of the continued development of the FYSO as a best-practice tool for spectrum management, promoting transparency and industry engagement by setting out the ACMA's proposed approaches to spectrum release and use.

The reforms to the Radiocommunications Act 1992 have provided the ACMA with increased flexibility to manage competing demands, and Optus broadly supports both this approach and the transparency delivered through the FYSO.

While the draft FYSO acknowledges the progression to preliminary planning stage for a number of bands, we suggest that spectrum management over this FYSO period must be guided by three strategic imperatives: the development of a national spectrum strategy, 6G readiness, and the delivery of the Universal Outdoor Mobile Obligation (**UOMO**).

In support of these imperatives, we consider that spectrum management over the period of this FYSO should focus on the following key issues:

- ESL-related activities must be treated at the highest priority within the work program.
- The absence of a national spectrum strategy places a heightened burden on the FYSO to provide clear, long-term direction.
- The ACMA should adopt a holistic, whole-of-band approach to mid-band planning to avoid a repeat of the fragmented outcomes seen in the C-band replanning and allocation processes.
- The 1.8 GHz and 2 GHz band replanning approach should be guided by a long-term public-interest framework that preserves the spectrum's primary role in supporting competitive public mobile services, including delivery of UOMO, while enabling complementary private and local-area use cases where appropriate.
- 2300-2302 MHz conversion to spectrum licencing to support the delivery of 100MHz bandwidth for 5G services in the 2.3 GHz band.
- Progressing the allocation of 2 GHz MSS spectrum to support Direct to Device (**D2D**) services and the UOMO, with explicit clarity on Mobile Network Operator (**MNO**) access.
- Continued assessment of current frameworks against industry and international announcements in the 6GHz band. This includes ensuring that planning decisions in the upper 6GHz band are made expeditiously and do not foreclose options which can deliver 200 MHz channel bandwidths for wide-area wireless broadband services ahead of expected 6G from approximately 2030.

We also refer the ACMA to the Australian Mobile Telecommunication Associations (**AMTA**) submission and the Optus submission to the UOMO Senate inquiry.

STRATEGIC CONSIDERATIONS FOR SPECTRUM OUTLOOK 2026-31

Ensuring the appropriate band arrangements are in place is fundamental for ensuring the ever-increasing demand on finite spectrum resources can meet the expectations of licensees and spectrum users.

The ACMA should continue to prioritise the work program relating to expiring spectrum licences (**ESL**s) as this forms the cornerstone for promoting long-term network investment in Australia's critical communications infrastructure. The release of final 1800 MHz ESL pricing did not occur within the ACMA's indicated timeframe, resulting in material consequences for renewal planning. We request that the ACMA implement measures to ensure that subsequent tranches proceed according to schedule. We have set out our detailed views on the ESL process in submissions to the ACMA's ESL Stage 4 consultations, and we refer the ACMA to those, and our earlier submissions[1].

Importantly, while the ESL consultation process is nearing completion, the pricing outputs of the process must be appreciated in the context of the broader capital reality facing MNOs over the FYSO period. Spectrum renewals and new spectrum acquisitions are not funded from separate budgets – they draw from the same finite capital envelope. ESL prices that are set at levels that are too high, or without sufficient certainty, directly constrain the industry's capacity to bid for, deploy, and fully utilise new spectrum bands as they become available. Higher spectrum prices will elevate the operating cost base for MNOs to provide services and will eventually translate to higher cost for end customers. This tension is particularly acute given the volume of spectrum investment that will be required during the FYSO period, across both renewals and new allocations needed for 6G. The ACMA should therefore recognise the ESL pricing approach not as a standalone administrative exercise, but as a lever that materially shapes the investment environment for all future spectrum activity.

In addition to the ongoing and critical work in relation to ESLs, Optus considers that spectrum management over the period of this FYSO must be guided by three strategic imperatives:

- **National spectrum strategy:** Australia requires a more coherent and forward-looking mobile spectrum policy from government. While the FYSO is not a substitute for such a policy, it must, in the interim, provide clear principles for spectrum harmonisation and optimisation, and new allocations.
- **6G readiness:** Ensuring adequate spectrum is available to support the competitive launch of 6G networks in Australia around 2030, including low-band and mid-band pathways alongside continued optimisation of existing 5G spectrum holdings.
- **UOMO delivery:** Ensuring that flexible and appropriate spectrum solutions are in place to support MNOs under UOMO, while recognising that D2D technology is still maturing and that spectrum constraints are real.

National Spectrum Strategy

Optus encourages the ACMA to adopt a long-term, holistic plan for spectrum allocation to WBB. The ACMA should plan each band as part of a coherent system, rather than allocating spectrum in

[1] https://www.acma.gov.au/consultations/2025-04/expiring-spectrum-licences-stage-3-preliminary-views; https://www.acma.gov.au/consultations/2024-03/expiring-spectrum-licences-stage-2-information-gathering-and-views-uses-frequency-bands-and-alternative-licence-conditions

fragmented portions. Disconnected allocations undermine the harmonisation and economies of scale needed to reduce equipment and device costs and attract sustained infrastructure investment.

Of equal importance in meeting ever-increasing demand for services is the readiness of existing bands to support future technologies. A whole-of-band approach, for each band, will give industry the investment certainty it needs, while preserving the ACMA's flexibility to maintain a pipeline of spectrum in a way that protects incumbent services and manages interference risks.

It is acknowledged that it is not the ACMA's role to develop that overarching vision, as that responsibility sits with the Federal Government. In the absence of a national spectrum strategy, the FYSO is the most important planning document available as a surrogate for long-term strategic direction. This places a heavier burden on each FYSO iteration to signal clearly where Australia's spectrum ecosystem is headed, and for the FYSO to take a proactive rather than reactive posture on the spectrum decisions that will shape the country's communications landscape.

The current C-band allocations show how fragmented outcomes can emerge from decisions made without a coherent framework, disconnected geographical and frequency spectrum allocations, inconsistent technical settings and duplicated regulatory effort across industry and the ACMA. Without a shift toward holistic, whole-of-band planning approach, informed by a clear government vision, similar outcomes risk recurring in the bands critical to 6G and UOMO delivery. Future planning must be better coordinated to accommodate upcoming technologies, using a structured, methodical approach of the kind taken with ESLs.

6G Readiness

The quality of 5G, and ultimately 6G, services will continue to depend on the quality and quantity of the spectrum available to MNOs. It follows that efficient allocation of spectrum resources will be crucial to achieving this outcome, including through:

- Band harmonisation processes to promote spectrum efficiency being better leveraged by the ACMA and industry. Licence harmonisation, band reallocation and defragmentation are also key steps in enabling allocated spectrum to be used for new technologies.
- Co-existence, coordination and cooperation to deliver spectrum utility. Focus on interference management is needed to ensure that spectrum allocated under formal spectrum licensing arrangements remain of sufficient quality and utility for use by licensees.

Optus acknowledges the ACMA's recognition of 6G as a key enabler of Australia's future productivity objectives. However, while initial 6G deployments are expected to leverage upper mid-band spectrum, including the upper 6 GHz band, from approximately 2030, no clear domestic spectrum roadmap for 6G has yet emerged. The ACMA should take active steps to ensure that planning decisions made during this FYSO period do not foreclose the spectrum options necessary for 5G advanced deployment, particularly in the upper 6 GHz band above 7100 MHz.

In the Future use of the upper 6 GHz band Outcomes Paper[2], the ACMA decided to reserve the frequency range for 6585 –7100 MHz for WA WBB in yet to be defined metro areas/regional centres. While this decision is welcomed, it does not go far enough to support future 6G requirements, particularly the need for contiguous 200 MHz-wide channels.

[2] Future use of the upper 6 GHz band, ACMA Outcomes Paper, December 2024 <https://www.acma.gov.au/sites/default/files/2024-12/Outcomes%20paper%20-%20Future%20use%20of%20the%20upper%206%20GHz%20band_0.pdf>.

Optus considers there are opportunities for additional spectrum to be made available above the upper 6 GHz band to support long-term IMT evolution. A staged approach could include:

- **7100–7125 MHz**, aligning with current European RSPG, WRC-23 Region 1 & 3, Ofcom consultation on expanding access to the 6GHz band[3]
- **7125–7250 MHz**, consistent with WRC-27 Agenda Item 1.7, which would make up to 665 MHz available for wireless broadband and enables a minimum of 200 MHz contiguous spectrum per existing MNO; and
- **7250–8400 MHz (or parts thereof)**, for future consideration for IMT through subsequent consultation processes.

Optus encourages ACMA to maintain the current position, notwithstanding ongoing advocacy from the Wi-Fi community. In this context, the ACMA should adopt a longer-term 6G perspective and play an active advocacy role in support of global identification of the 6585–7250 MHz band for IMT at WRC-27, including consideration of a further extension up to 8400 MHz.

Supporting the Universal Outdoor Mobile Obligation

The ACMA has an important role under the Radiocommunications Act in ensuring that appropriate planning, licensing and allocation frameworks are in place to support the UOMO. D2D satellite services are expected to be a key mechanism for meeting the UOMO, particularly in remote areas and Australia's external territories.

The ACMA's commitment to developing a work program in 2026–27 to examine how D2D services covered by the UOMO can be facilitated in external territories is welcomed and must be progressed without delay. Should the Government proceed with the 1 December 2027 UOMO commencement date, ensuring that the necessary spectrum planning, licensing and allocation frameworks are in place to support D2D deployment is a matter of practical urgency, not a medium-term consideration. Legislation that moves ahead of spectrum, technology and commercial readiness creates real risks for industry and for the consumers the UOMO is intended to serve.

Delivery of UOMO services over terrestrial mobile spectrum is important to ensure reliability, scalability, and consistency with existing mobile network planning and coverage obligations. This includes service delivery via the terrestrial mobile network as well as the use of terrestrial IMT spectrum to support D2D services. Use of IMT spectrum in both terrestrial and D2D networks leverages established infrastructure, proven handset support, and well-understood interference management frameworks, providing greater certainty of service availability than emerging non-terrestrial alternatives.

In this context, the 1800 MHz band represents a strong candidate for supporting UOMO in the early stages. The band provides a favourable balance between propagation and capacity, is widely supported by existing devices, and poses a comparatively lower risk to radio astronomy services than alternative low-band and mid-band spectrum. These characteristics make 1800 MHz well suited to delivering baseline outdoor D2D mobile coverage while minimising coexistence and coordination challenges. Therefore, Optus considers it necessary for the ACMA to progress the spectrum licence conversion of remote 1800 MHz apparatus-licensed holdings to deliver a national spectrum licence.

As the 2 GHz MSS band (1980–2010 MHz and 2170–2200 MHz) is incorporated into the 3GPP Non-Terrestrial Networks (**NTN**) specification and is a recognised band for D2D services, it offers a credible pathway for long term UOMO-related services in areas where terrestrial coverage is lacking. It is also

[3] https://www.ofcom.org.uk/spectrum/innovative-use-of-spectrum/consultation-expanding-access-to-the-6-ghz-band-for-commercial-mobile-and-wi-fi-services

likely to be the primary band for next-generation satellite D2D services, pending expansion of 3GPP NTN standards to IMT bands.

The entities legally obligated to deliver UOMO (MNOs) must be the only entities having access to the spectrum needed to meet that obligation. If satellite operators hold 2 GHz MSS licences without any UOMO delivery responsibility, mobile network operators subject to statutory coverage requirements would be forced to rely on wholesale access on terms set by those operators. This creates an imbalance, where obligated parties depend on spectrum controlled by parties with no equivalent obligations, potentially increasing costs and reducing value for consumers. ACMA should therefore design the 2 GHz MSS allocation framework, including eligibility settings, to ensure MNOs can access spectrum directly rather than being structurally dependent on wholesale arrangements.

Accordingly, Optus requests access to the 2 GHz MSS spectrum under a licensing framework that enables mobile network operators to deliver UOMO-related services directly, providing the flexibility, certainty, and competitive neutrality required to integrate D2D capability alongside existing terrestrial networks.

We also refer the ACMA to our submission to the UOMO Senate inquiry.

PROPOSED 2026-27 SPECTRUM WORK PLAN AND FYSO

Optus supports the ACMA maintaining a balance between planning ("new allocations") and optimisation ("band harmonisation") activities.

Optus also welcomes the inclusion of the table of licensing and regulatory development[4] and proposes consultation plans that have previously been shared in previous versions of the FYSO.[5] This has been valuable in assisting with internal resource planning to support upcoming consultations and review activities.

Our views on the ACMA's plans for monitoring, initial investigation, preliminary replanning or re-farming of spectrum bands are summarised below.

Monitoring

We support continued monitoring of the bands identified by the ACMA.

600 MHz band

The 600 MHz band remains at the monitoring stage with no change to prioritisation. Optus reiterates our view that this band should ultimately be reallocated for IMT use. There is clear and growing international momentum for the allocation of sub-700 MHz spectrum for mobile services[6] that warrants a more active posture from the ACMA in monitoring this band for IMT development.

The Minister for Communications indicated in late 2024 that the Department would publish a white paper on 600 MHz band allocation and use[7]. As this has not yet occurred, the ACMA should engage with the Department to ensure this white paper is progressed, as it is relevant to the long-term planning of the band and the future of free-to-air television broadcasting.

Mid-band spectrum

The 3.3G Hz, 4.5 GHz and 4.8 GHz bands have been included in the FYSO for many years, and we welcome continued monitoring of these bands for international developments.

The 4400–4800 MHz band continues to attract domestic interest from MNOs, wireless internet service providers and private network operators. Optus welcomes the ACMA's monitoring activities related to this band, including whether to progress parts of the band to initial investigation, subject to the outcomes of WRC-27 in relation to IMT use.

[4] Table 5, Draft FYSO 2026-2031.

[5] For example, refer to tables 9 and 10 which set out both the issues and proposed timeline in FYSO 2024-2029.

[6] For example, IMT in the 600MHz band has been allocated for IMT in Saudi Arabia and UAE, and is being considered across a number of developing regions, with 60+ countries having also signed into new footnotes for low-band spectrum.

[7] https://minister.infrastructure.gov.au/rowland/speech/radcomms-2024-melbourne.

Other bands

Optus notes the longstanding inclusion of the 40 GHz, 46 GHz and 47 GHz bands in the FYSO and supports continued monitoring of international developments. Optus does not consider there is an immediate need to accelerate progress for the 40 GHz and 47 GHz bands.

Future bands

Optus notes WRC-27 agenda item 1.7 will consider studies on sharing and compatibility and develop technical conditions for the possible use of IMT in the frequency bands 4400-4800 MHz, 7125-8400 MHz and 14.8-15.35 GHz.

The ACMA is also considering the use of the 5030-5091 MHz frequency band for use in command and control radio links in the Radio Regulations.

We support the ACMA's ongoing monitoring of developments in these bands.

Initial investigation

2300 – 2302 MHz

While there has been continued recognition from the ACMA that action is required, this has not advanced beyond the initial investigation stage for many years.

Prioritising the conversion of the 2300–2302 MHz segment to spectrum licensing delivers significant public interest and spectrum efficiency benefits.

The enablement of a full 100 MHz operation in the 2300 MHz band would directly translate into increased network capacity and higher sustained user throughput as well as better utilisation of deployed infrastructure. These outcomes align with ACMA's objectives.

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Given the strong efficiency case, low incumbent impact, and direct linkage to improved mobile network capability, Optus respectfully submits that the 2300–2302 MHz segment warrants prioritised consideration for spectrum licence conversion.

Early action would allow Australia to fully realise the benefits of existing 2300 MHz allocations, reduce unnecessary operational complexity, and ensure alignment with global 5G technology evolution. Optus remains available to support ACMA with technical data, potential trial results, and stakeholder engagement to assist in progressing this matter.

Optus reiterates our position that this band should be offered as a direct allocation to existing adjacent incumbents. It is critical that any change in band and licence configuration is completed at least 3 years prior to the 2.3 GHz spectrum licences expiring in July 2030, noting the application window opens 2 years prior to licence expiration and therefore having confirmation of this 2MHz allocation prior to 2.3GHz renewal application is critical. If this work is not progressed promptly during this FYSO period, the window of opportunity to address the issue before renewal will be lost.

1800 MHz - long term use (1710–1785 MHz and 1805–1880 MHz)

Optus welcomes the ACMA's commencement of an initial investigation into the long-term use of the 1800 MHz frequency ranges currently occupied by rail services (state government entities), with a discussion paper expected in Q4 2026.

The 1.9 GHz FRMCS band provides a fit-for-purpose, internationally harmonised alternative for Future Rail Mobile Control System deployments, and the ACMA should actively support this transition from GSM-R 1800.

Since rail services continue to occupy rail corridor locations in the 1800 MHz band in the short to medium term, apparatus licensing provides necessary operational continuity during this period. However, the ACMA's investigation into long-term use must be conducted with genuine urgency. The 1800 MHz band is the most suitable band for D2D delivery using terrestrial IMT spectrum and this should be considered part of a long-term option for the band. Without access to additional metro 1800 MHz spectrum, MNOs would need to remove spectrum from the existing terrestrial mobile networks for UOMO, resulting in adverse impacts on network performance and customer services.

Rail operators are beginning to plan FRMCS network deployments now, with end of support for GSM-R looming in 2035, and clarity on the long-term spectrum position for the 1800 MHz band is essential for informed investment decisions.

We look forward to engaging substantively with the Q4 2026 discussion paper.

Preliminary replanning

Optus acknowledges the continued inclusion of the 1.5 GHz and the 1800 MHz and 2 GHz bands (outside of spectrum-licensed areas) at the preliminary replanning stage and will maintain a watching brief.

1.5 GHz (1427–1535 MHz)

Optus acknowledges ACMA's plan to commence consultation on options for use of the 1.5GHz band (1427-1535MHz) and looks forward to this being made available.

1800 MHz (1710–1785 MHz and 1805–1880 MHz) and 2 GHz (1920–1980 MHz and 2110–2170 MHz) outside of spectrum-licensed areas

Optus welcomed the ACMA's June–October 2024 consultation on future arrangements in these bands and submitted a response supporting consideration of reallocating spectrum from apparatus to spectrum licensing. We consider that the most efficient means of delivering long-term public benefit is to separate apparatus-licensed use in remote Australia between localised private wireless applications and spectrum required for public mobile networks, with the 1800 MHz band identified primarily for MNO use and the 2 GHz band for infrastructure operators and other private wireless network operators. Importantly, ongoing MNO access to the 2 GHz band in regional areas will remain necessary, and we support the creation of a distinct and dedicated allocation for non-MNO users. Consistent with the growing recognition of mobile services as essential services, Optus considers it important that any replanning approach is guided by a long-term public-interest framework that preserves the primary role of the spectrum in supporting competitive public mobile services, while enabling complementary private and local-area use cases where appropriate.

The decision to retain these bands at the preliminary replanning stage, rather than release planning outcomes as flagged in the FYSO 2025–30, is acknowledged. The ACMA's reasons, being divergent views in the 2024 consultation and growing interest in D2D services, reflect a material shift in the policy context.

In this environment, allocation of the 1800 MHz band (outside of spectrum-licensed areas) to MNOs via spectrum licensing on an area-wide or regional basis remains the preferable outcome, and the ACMA should present this as one of the options in the Q3 2026 revised consultation paper.

As the 1800 MHz band poses a comparatively lower risk to radio astronomy services than alternative low-band and mid-band spectrum, it is currently the most suitable terrestrial IMT band for supporting UOMO. Optus considers that this is the most likely solution for UOMO delivery in the shorter term and encourages the ACMA to progress the arrangements required to transition the apparatus licences to spectrum licences and to support options for national frequency holdings for MNOs. The reallocation period and the transition arrangements for incumbent apparatus licence holders are likely to be the most significant practical issues for stakeholders, and the ACMA should engage closely with MNOs and other parties on these matters prior to the release of the revised planning options.

Implementation stage

Optus acknowledges the progression of the 2 GHz MSS and upper 6 GHz bands further within the implementation stage and will continue to engage actively.

2 GHz MSS (1980–2010 MHz and 2170–2200 MHz)

Optus broadly supports the ACMA's approach to this band. The allocation of spectrum in the 2 GHz MSS band is now a significant priority given the Australian Government's plans to establish the UOMO. D2D satellite services operating in this band may be a key mechanism for delivering the UOMO, and the allocation framework must be designed to support this outcome.

Optus' position is that access to the 2 GHz MSS band should be restricted to UOMO obligation holders, namely mobile network operators (MNOs). The 2 GHz MSS spectrum is uniquely positioned as being the longer-term solution for D2D given that it can meet coverage requirements, device compatibility, and service quality for satellite-to-mobile connectivity. The 2 GHz MSS bands are harmonised internationally for mobile-satellite use and are already supported by global satellite vendors, chipset providers, and standards.

More importantly the 2 GHz MSS is a new band and will enable MNOs to re-purpose IMT spectrum back into the terrestrial network when there is sufficient Australian market 2GHz MSS handset support, thereby increasing spectrum utilisation for Australians within the current terrestrial coverage area.

Granting MNOs direct access will ensure that Australia will be able to access a competitive wholesale satellite network operator (**SNO**) market. MNOs will be able to enter into commercial arrangement with a satellite provider which includes access to the spectrum and to change provider if better options become available in the SNO market. If the spectrum resides with the satellite operator, then there are little commercial incentives to drive better pricing arrangements for MNOs and the Australian consumer.

The question of how MSS spectrum is allocated should not be considered as a narrow, technical planning decision. Rather, it is a significant precedent-setting choice about control of Australia's future mobile connectivity. Optus draws the ACMA's attention to the active and well-resourced international campaign by satellite operators, including large NTN providers, to reshape spectrum frameworks in favour of NTN-first or satellite-primary allocation models. This position is being actively and formally opposed by the GSMA and mobile network operators globally, who have consistently argued that satellite and NTN services should complement, not displace, terrestrial mobile networks, that IMT bands used for D2D should not gain MSS primary allocation as a result of WRC-27 AI1.13 outcome, and that IMT and MSS spectrum must remain under the control of licensed mobile operators who bear coverage obligations and consumer accountability. Optus' position in this submission is squarely aligned with that global MNO and GSMA stance. Allocating 2 GHz MSS spectrum to satellite operators without guaranteed and direct access for Australian MNOs would weaken domestic competition, shift effective control of critical connectivity infrastructure to entities with no equivalent regulatory obligations, and create long-term structural dependency and cost risk for UOMO delivery. The ACMA should approach the 2 GHz MSS allocation framework with full awareness of this global context. A decision that appears

administratively conservative in isolation could, in practice, give up meaningful control over aspects of Australia's mobile connectivity future to operators whose incentives are not aligned with domestic coverage, affordability, or competitive outcomes.

Optus also notes that UOMO is not a single D2D product, it will be delivered across multiple technologies and the interoperability between the service offerings will be important. Interoperability management often requires configuration changes in both networks to deliver capability and performance when customers move between terrestrial and non-terrestrial networks. Control over the delivery spectrum is a necessary pre-requisite to ensuring these coordination efforts can be effectively developed and maintained.

Optus considers that, as UOMO represents a world-first regulatory obligation, the ACMA should ensure that any allocation of the 2 GHz band is guided by Australia's specific policy objectives and future requirements, rather than being constrained by international practices or historical domestic arrangements developed for different use cases. Furthermore, this recommendation should also be applied on a forward-looking basis to all future MSS band allocations, ensuring consistency across bands.

Upper 6 GHz

Optus acknowledges the ACMA's planning decision for the frequency range 6585-7100 MHz from the upper 6GHz band (6425-7125MHz) for WA WBB use.

We support the ACMA's proposed Q4 2026 consultation on licensing arrangements and a draft re-allocation declaration for the 6585–7100 MHz band. Authorising WA WBB access via spectrum licences, with apparatus-licensed access for WBB outside defined areas, is the appropriate licensing approach for this band.

The ACMA should also, in the Q4 2026 consultation, give consideration to the spectrum range from 7100 MHz up to 7250 MHz, as part of a whole-of-band planning framework that treats the upper 6GHz band as a coherent whole. European developments, including the RSPG opinion of November 2025 and Ofcom's January 2026 paper, confirm that the international planning boundary at 7125 MHz is under active consideration in the context of WRC-27 agenda item 1.7. Australia must take an active role within the WRC-27 process in support of identification of 7125-7250 MHz for IMT to ensure alignment between the European and Australian allocation and technical frameworks. This will best support delivery of the contiguous 200 MHz-wide channels that 5G-Advanced and 6G services require.

We also support the ACMA's recognition of the benefits of making a re-allocation declaration well in advance of the anticipated MNO need for upper 6 GHz spectrum. Certainty around access to and pricing for upper 6 GHz spectrum is a pre-requisite for Australia's ability to lead and influence development of the global 5G-Advanced and 6G ecosystem in a way that is beneficial to Australia. From an MNO perspective, the ability to plan network evolution, conduct pre-commercial trials, align vendor roadmaps, influence standardisations and support device ecosystem development in the late 2020s depends on having regulatory and commercial certainty well in advance of 2030. Without early clarity on access conditions and pricing, MNOs cannot responsibly commit the capital required to lead rather than follow. Deferring access or leaving pricing signals ambiguous risks Australia falling behind peer markets (including in Europe and Northeast Asia) where MNOs are actively positioning upper 6 GHz as the necessary strategic bridge between 5G-Advanced and 6G.[8] Optus submits that if Australia aspires to

[8] For example: https://www.gsma.com/about-us/regions/europe/general/essential-action-for-europes-mobile-future/

be a technology leader, and not merely a fast follower, the ACMA has a critical and time-sensitive role to play now.

Following WRC-27 outcomes, Optus would support an opportunity to extend the upper limit of the WBB allocation beyond 7100 MHz, and early consideration of this in the Australian planning framework, consistent with the holistic, whole-of-band approach we have called for throughout this submission, would be prudent.

The ACMA should move expeditiously with the 6585–7100 MHz implementation to provide certainty to WBB operators who will require this spectrum by approximately 2030. Optus supports the establishment of a Technical Liaison Group (TLG) for the spectrum licence technical framework, following the re-allocation declaration.

OTHER ISSUES: PRICING AND COMPLIANCE PRIORITIES

Implementation of the Spectrum Pricing Review

Optus supports the ongoing implementation of the Spectrum Pricing Review recommendations through formal consultations and periodic band pricing reviews.

Transparency over the pricing arrangements to be applied in each pricing decision remains important, particularly with regard to continuity of service, price stability and investment incentives for existing licensees.

For 2026–27, Optus supports the following pricing activities:

- Maintaining the tax regimes for annual updates to apparatus and spectrum licence taxes, including the annual EME component amount; and
- Progressing the 520 MHz to 5 GHz band pricing review to ensure relative prices between adjacent bands remain appropriate.

We note the government's one-year suspension of the commercial broadcasting tax and the resulting administration of rebates under the Rebate Rules, and we do not have specific comments on this matter at this stage.

Compliance priorities

Optus supports the ongoing focus on interference activities and addressing non-compliant radiocommunication devices. Effective compliance and enforcement arrangements, supported by industry cooperation, are critical to mitigating harmful interference, safeguarding licensed spectrum use, and maintaining a fair and predictable operating environment for all spectrum users.