Draft five-year spectrum outlook 2026-31

ACMA

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Public Submission

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Submission

TPG Telecom (**TPG**) welcomes the opportunity to comment on the ACMA's Draft five-year spectrum outlook 2026-31 (**FYSO**).

TPG supports AMTA's submission broadly. This TPG submission is confined to the two issues below:

(1) the proposed timing and framing of the ACMA's work on upper 6 GHz spectrum; and

(2) spectrum management aspects of implementing the UOMO, including allocation of the 2 GHz MSS band.

Upper 6 GHz spectrum

The draft FYSO indicates that the ACMA intends to progress implementation of wide area wireless broadband (**WA WBB**) arrangements in the upper 6 GHz band as detailed in its December 2024 decision paper. The next step is to consult in Q4 2026 on a spectrum re-allocation declaration and commence associated works. This points to an allocation outcome around late 2028 based on past re-allocation timelines.

TPG suggests that the ACMA brings forward this consultation to the start of Q3 2026. TPG believes the upper 6 GHz band is one of the most vital remaining blocks of spectrum for mobile services, and that there are still unresolved issues that need to be worked through. Therefore, the ACMA should provide as much time as possible for the allocation process.

The upper 6 GHz band is one of the few remaining opportunities to make a meaningful addition to Australia's future mobile capacity pipeline. We note the ACMA assumes the IMT industry only needs additional mid-band spectrum by around 2030 to support future demand. TPG does not believe the ACMA's timing assumption is robust.

The level of demand, and demand growth, is not evenly distributed across Australia. In some major population areas, the demand is already starting to strain available capacity and will need additional fresh spectrum much earlier than 2030.

While this submission does not seek to pre-advocate matters the ACMA has already indicated is in the pipeline of preparatory work for the upper 6 GHz band, TPG would like to provide three principles that guide those forward works.

Make the objective clear: maximise the total usable amount of spectrum for IMT

The starting principle should be that Australia should seek to maximise the total amount of mid-band TDD spectrum that can be made usable for IMT services.

That matters because mobile data demand continues to grow. A planning approach that

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preserves unnecessary fragmentation, holds back usable spectrum, or allows process caution to become a proxy for policy would be misplaced. The objective should be to make as much spectrum as practicable available for productive IMT use.

Bring the process forward and treat timing as a substantive issue, not an administrative one

Timing should not be relegated to resourcing considerations. As flagged above, there are still unresolved issues that need to be worked through before an allocation can be implemented. TPG does not underestimate their complexity and the need for careful consideration. Any delay in the commencement of the pipeline of work raises risk that the spectrum is not allocated in time to meet demand.

Design the allocation in a way that supports an industry already under financial pressure

The final principle is that the upper 6 GHz allocation should be approached in a way that supports efficient use and investment by the IMT sector, rather than adding further strain to an industry that is already under material financial pressure.

As a concrete example, the ACMA should not approach the allocation of 6 GHz in the way the 3.4 GHz band was done. In the 3.4 GHz band, allocation was done block by block over time, which meant supply was constrained by regulatory design and inflated the cost of that spectrum. The totality of the usable spectrum, ie, the upper 6 GHz band and the lower portion of the 7 GHz band (as identified in the AMTA submission) should be allocated in a single process to maximise not only the efficient use of spectrum but also to ensure that supply is not artificially constrained.

This is not a claim for special treatment. It is a recognition of commercial reality. Mobile operators are being asked to meet rising traffic demand, maintain and expand coverage, support resilience, and continue investing in network capability in a market with uneconomic returns. In that context, allocation design matters, timing matters, and licence settings matter. Any approach that seeks to maximise fiscal extraction at the expense of deployment, utilisation or downstream competition would not promote the object of the Radiocommunications Act.

Implementing the UOMO

TPG Telecom supports the ACMA's early consideration of spectrum management aspects of implementing the UOMO. This would especially be required if the default start day remains 1 December 2027, despite views from industry and other stakeholders that this date is unachievable. If the start day does not change, we would encourage the ACMA to release its workplan as early as possible.

Crucially, the UOMO requires mobile operators to provide outdoor mobile coverage to

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external territories. If the scope of the UOMO is unchanged, then it is vital mobile operators have certainty about spectrum access well in advance of the start of the UOMO. This is a significant threshold question, as the UOMO currently requires mobile network operators to be lawfully compelled to provide coverage in an area where it does not hold the necessary spectrum rights.

Allocation of the 2 GHz MSS band will require the ACMA to take a considered and cautious approach, given its importance in implementing the UOMO. The draft FYSO notes consultation on allocation instruments to commence in Q2 2026 and the ACMA is working towards an allocation in Q4 2026. While TPG Telecom does not oppose these timelines, we would support the ACMA taking more time to consider the complex issues if required. This is important given the evolving D2D market. Further, legislation for the UOMO has not yet passed, so the full scope of the UOMO is yet to be finalised. It may therefore be sensible for the ACMA to delay allocation of the 2 GHz MSS band until the UOMO Bill is passed, otherwise there is no certainty on how the ACMA would maximise the public interest in any allocation.

In TPG Telecom's view, allocation of the 2 GHz MSS band should support a competitive market for satellite network operators, with multiple operators and multiple commercial models available. TPG Telecom would not support an outcome that would result in a single operator having an effective monopoly over the 2 GHz MSS spectrum, whether they are a satellite network operator or a mobile network operator. To support the UOMO, TPG Telecom believes allocation of 2 GHz MSS spectrum should be limited to satellite network operators. It is critical that this allocation comes with licence conditions requiring satellite network operators to provide all mobile operators with access to Direct-to-Device (**D2D**) services on fair and reasonable terms, with avenues to expedite or escalate discussions if required. This is necessary to support implementation of the UOMO, given successful delivery of the Government's policy objectives is dependent on mobile operators accessing D2D technology and services. TPG Telecom looks forward to engaging with the ACMA further on these issues in its future consultations.

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