Telstra submission:

ACMA Draft Five-year spectrum outlook 2026–31 and 2026–27 work program.

Public Version

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Executive Summary

Telstra welcomes the opportunity to provide comments to the Australian Communications and Media Authority (ACMA) on the draft Five-year spectrum outlook (FYSO) 2026–31 and the 2026–27 work program (Draft FYSO). Our view is that Australia requires a clear, National Spectrum Strategy to align Government, the ACMA and stakeholders on our highest shared priorities. This strategy would accelerate decisions that materially affect Australia's connectivity, productivity and safety.

A National Spectrum Strategy is required

Australia's spectrum planning must move beyond band-by-band, point-in-time decisions. A National Spectrum Strategy is needed to set objectives, manage trade-offs transparently, and provide investment certainty for critical digital infrastructure. A piecemeal approach to spectrum management might satisfy certain public interest considerations in the short or medium term, but the long-term public interest cannot be satisfied without formulating more holistic priorities. While we recognise a National Spectrum Strategy would need to be set by Government, we believe the ACMA is in a strong position to advocate for this and to take a more strategic and proactive approach to its regular work planning.

A National Spectrum Strategy should include these priorities for the mobile industry:

- **Launching 6G in Australia by 2030** – for deployment to commence by 2030, the ACMA must offer a defined, accelerated pathway for clearing and allocating priority 6G bands—particularly **6585 – 7250 MHz** (defined in this submission as "**6 GHz**") — while also progressing policy work to enable a future digital dividend in 600 MHz shortly after 2030. The ACMA's decision sequencing is critical for making large contiguous blocks of spectrum available.

- **Unlocking spectrum for satellite-to-mobile (STM) technology** – STM presents an exciting development in telecommunications and will be central to delivering the Universal Outdoor Mobile Obligation (UOMO). STM requires a spectrum roadmap and approach to licensing that preserves Australia's sovereign interests and ensures service continuity for consumers (i.e. we must avoid a situation where mobile network operators (MNOs) have to compromise existing services by diverting spectrum used for these services to the delivery of the STM component of the UOMO). As the 2 GHz MSS band is currently the only band capable of supporting 5G-NTN (required for UOMO voice) in the near term, the ACMA must reconsider the rules for licence ownership and consider adding requirements that the spectrum be used to support UOMO. A STM roadmap should also encompass the potential of 1800 MHz and investigate repurposing other MSS bands for STM and UOMO.

- **Enhancing the quality and utility of spectrum** – spectrum management settings should protect and enhance the quality and utility of Australia's spectrum. In particular, the ACMA should facilitate defragmentation to create wider contiguous holdings (notably across the 3.x GHz bands), enabling more efficient deployments and supporting faster 6G rollout.

While the priorities identified above are focused on mobile networks, we recognise a National Spectrum Strategy should consider priorities for all users of spectrum including Defence, broadcast, satellite and fixed service uses. It could also closely reference international developments to ensure harmonisation with emergent regional and global policy, planning and standards to help support ongoing economic access to global equipment and device ecosystems via international alignment.

Comments on the ACMA's Draft FYSO and FY 2027 work plan

Section 3 of our submission responds to key aspects of the ACMA's Draft FYSO program and 2026-27 work plan that we would like changed or supplemented:

- **Single allocation of 6 GHz (6585-7250 MHz)**: We seek a single allocation of 6 GHz towards the end of 2028 or early 2029 to facilitate MNO access and 6G deployment by 2030. There are various ways the ACMA could achieve this. Regardless of which pathway is taken, the ACMA must:
    - **act now** towards freeing up 6 GHz to keep Australia on track for a timely 6G launch. For example, clearance work and necessary consultations should start in 2026;
    - stay **attuned to and contribute to international developments,** including World Radio Conference 2027 (WRC-27) agenda item 1.7, to ensure Australia is moving in a consistent direction; and
    - carefully sequence the work so that 6 GHz is **subject to a single allocation** towards the end of 2028 or early 2029.
- **Pause the decision on 6 GHz Automatic Frequency Coordination (AFC):** We request that the ACMA pause further work on AFC until the future of 6 GHz is resolved. The ACMA's priority must be to create the largest contiguous block possible to support 6G readiness, as outlined above. The deployment of AFC systems, even below the 6585 MHz boundary creates the risk of constraining the availability of high-quality spectrum for 6G WBB and limiting options for relocating fixed links.
- **Bring forward timing for 1800 MHz planning**: We support the ACMA's plan to release a discussion paper on the "long-term use of the 1800 MHz band" noting its potential as a STM band, however, we would like this to occur earlier than Q4 2026. In the meantime, the ACMA should pause its work on 1800 MHz and 2 GHz IMT bands outside of spectrum-licensed areas, to avoid making decisions that constrain its freedom in driving more holistic outcomes (such as the possibility of creating a nation-wide licence in 1800 MHz to support delivery of UOMO).
- **Spectrum sharing**: the Draft FYSO indicates the ACMA's willingness to consider new proposals for spectrum sharing and distinguishes between 'traditional spectrum sharing' and dynamic spectrum access regimes. Traditional spectrum sharing, such as coordination measures contained in Radiocommunications Advisory Guidelines (RAGs) and Radiocommunications Assignment and Licensing Instruction (RALIs), are critical for optimal spectrum use. However, we remain strongly opposed to dynamic spectrum access regimes that allow for pre-emption and ad hoc coordination and that carry risk of disruption to lower-priority services. International examples of such systems are not experiencing compelling success. Despite our opposition, should the ACMA decide to proceed with AFC in the lower 6 GHz (5925-6585 MHz), we recommend the ACMA add an item to its work plan to develop **guidance for service providers** wishing to develop commercial service offerings based on preemptable spectrum (i.e. spectrum that would have to give way to a higher priority user). This will encourage secondary users to consider and accommodate disruption to their services.
- **Remove Secondary Licensing Framework (SLF) from the work plan**: SLF work should be removed from the 2026-27 work plan. Considering the imminent release of the ACMA's preferred pricing approach for expiring spectrum licences (ESL), it is too late to introduce a SLF in the annual work plan. A SLF has the potential to impact the value of ESLs yet has not been materially taken into consideration as part of the ESL process.

- **Consultation on the "UOMO work program"**: The Draft FYSO foreshadows the creation of a "UOMO work program" that will consider, among other things, the provision of D2D services in external territories that sit outside licence boundaries. We ask the ACMA to consult and work closely with industry – both the named primary universal mobile outdoor providers and the satellite operators – in forming this work program or any UOMO standards, rules or benchmarks.
- **Consider broader MSS spectrum as part of a holistic, National Spectrum Strategy**. We request the ACMA add a new work item to review potential MSS spectrum candidate bands for STM and UOMO. We consider all potential 3GPP NTN bands should be considered in an overarching National Spectrum Strategy that explores the public interest criteria for automatic renewals of L-band and S-band MSS spectrum holdings, which currently use legacy technologies that benefit a relatively small number of users. In the context of UOMO and the growing demand for STM services generally (along with the growing number of STM providers), the ACMA should consider whether the public interest and a competitive market would be better served by repurposing the spectrum to STM.

Our submission also explores additional topics that we would like included in the FYSO, which focus on removing barriers to efficient spectrum use:

- Review the registration exemption threshold that applies to user equipment transmitters in the 3.4 GHz band to align this with limits specified by 3GPP, and do this ahead of the band's review as part of the ESL project;
- Review and possible rationalisation of Earth Station Protection Zones (ESPZs) in the 3400–4200 MHz C-band where they are underutilised, constrain mobile and fixed wireless services, and are unlikely to be candidates for relocation of metro and peri-urban teleports;
- Review existing teleports in metro and peri-urban areas, to quantify the spectrum denial to other use cases (e.g., 5G) in the vicinity of the teleport, with a view of developing a migration roadmap (as part of a National Spectrum Strategy) that could investigate technical solutions to improve coexistence, and/or encourage teleports causing spectrum denial to move to ESPZs;
- Remove the restriction on 3.7 GHz base-station in-band EIRP (Effective Isotropic Radiated Power) limit and align that limit with that of the spectrum licences in the 3400-3700 MHz band to support more flexible spectrum trading and defragmentation;
- Updating of microwave point-to-point planning (including consideration of wider channel bandwidths) and replanning the 13 GHz band to accommodate future backhaul needs and any displacement of fixed links from 6 GHz replanning; and
- Deprioritise work on 1.5 GHz IMT spectrum (1427-1535 MHz) until a holistic review of candidate MSS bands is completed. We recommend the ACMA delay the release of its next consultation paper on the 1.5 GHz band until a public interest review of the renewal of incumbent licences in potential MSS spectrum candidate bands for STM and UOMO is completed.

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1 Introduction

We welcome the opportunity to provide our comments to the Australian Communications and Media Authority (ACMA) in response to the draft Five-year spectrum outlook (FYSO) 2026–31 and 2026–27 work program for consultation[1] (**Draft FYSO**).

Spectrum is a scarce and valuable natural resource. A holistic approach to managing and allocating spectrum is critical to driving innovation, improving connectivity, and enhancing the digital experiences of Australians. These are not easy tasks - the unique nature of spectrum poses significant challenges. The Government and the ACMA must confront:

- competing voices on how best to use this scarce resource;
- the need to make decisions that result in unavoidable trade-offs;
- managing current uses cases while also preparing for compelling future use cases; and
- dealing with an asset that is crowded and technically complex.

This is why we support the creation of a **National Spectrum Strategy**. A National Spectrum Strategy will support the Government and the ACMA in navigating these challenges, which arise every time a decision concerning spectrum is on the table (regardless of the relative importance of that decision).

In addition to guiding and accelerating decision-making, a national strategy will have other critical benefits such as:

- encouraging large, sustained investment in digital infrastructure and technology;
- positioning Australia as a competitive, global leader; and
- aligning Government, the ACMA and stakeholders on national priorities

While it is the Government's role to set any national spectrum policy, the ACMA can use its FYSO to advocate that the Government must prioritise this work. Even in the absence of a National Spectrum Strategy, we call on the ACMA to take a strategic and proactive approach to its work planning and to align individual planning decisions with national policies and objectives.

We would welcome the opportunity to work with the Government, the ACMA and other stakeholders to develop a National Spectrum Strategy that ensures Australia's spectrum resources are used efficiently and effectively to deliver the best possible outcomes for the country.

Our submission is structured as follows:

- Section 2 outlines our views on a National Spectrum Strategy to promote:
  - launching 6G in Australia by 2030
  - unlocking spectrum for satellite-to-mobile (STM) technology
  - enhancing the quality and utility of spectrum
- Section 3 contains our comments on the ACMA's draft FYSO and 2026-27 work program
- Section 4 contains items we consider should be added to the draft FYSO and work program
- Section 5 contains a table of work items that meet our proposed National Spectrum Strategy, prioritised in order of importance

[1] The ACMA, 2026, *Draft Five-year spectrum outlook 2026–31 – consultation,* available at https://www.acma.gov.au/sites/default/files/2026-03/Five-year%20spectrum%20outlook%202026-31.pdf

2 A National Spectrum Strategy is required

Radio spectrum is a finite, scarce national resource, that requires careful, long-term planning and vision to ensure it is used efficiently, and optimally for Australia's social and economic wellbeing. For some time, Telstra and the mobile industry more generally, have been calling for a National Spectrum Strategy to address what we see as a gap in the long-term strategic planning for spectrum use in Australia. The March 2026 Deloitte Access Economics report, Future of Mobile: Reforms to modernise Australia's telecommunications,[2] calls for this. A National Spectrum Strategy would deliver significant benefits by providing investment certainty, driving efficient spectrum allocation, and securing Australia's future digital technology and economic leadership.

We appreciate it is not the role of the ACMA to set a National Spectrum Strategy (this sits with the Government), however the ACMA can use national policies and objectives to guide its individual planning decisions. We believe this approach would support the ACMA to make decisions that satisfy the long-term public interest.

This chapter of our submission outlines the elements we consider to be important for a National Spectrum Strategy, in which the mobile networks play a critical role. We recognise that a national strategy should address priorities for all users of spectrum, including Defence, broadcast, satellite and fixed service uses. It should also closely reference international developments — including the Asia-Pacific Telecommunity[3] (APT) and the International Telecommunications Union (ITU) — to ensure harmonisation with emergent regional and global policy and planning directions and help support ongoing access to global equipment and device ecosystems via international alignment.

2.1 A vision into the next decade

6G is scheduled to launch globally by 2030,[4] and it is vital that Australia is at the forefront of global 6G adoption to take advantage of its superior speed, capacity, security, resilience and energy efficiency features. Satellite-to-Mobile (STM) capability has already launched in Australia and is evolving quickly. The Universal Outdoor Mobile Obligation (UOMO) legislation is expected to be enacted this year, placing an obligation on the three major terrestrial mobile operators to deliver reasonable outdoor coverage across the Australian landmass.

A holistic vision for the next decade would contemplate these major developments in mobile services as well as explore changing usage patterns and technology evolution across all spectrum use (mobiles, broadcast, RLAN, etc) to identify changes in demand, and new ways to use spectrum more efficiently. This could pave the way for a second digital dividend through more efficient use of television broadcast spectrum, migration of rail safety from 2G (GSM) to 5G (FRMCS), and a better understanding of RLAN demand (both indoor re-usability and outdoor demand).

In the absence of a National Spectrum Strategy, we are concerned there is a missed opportunity to carefully plan future spectrum use in a manner that delivers the greatest benefit to Australians both now and in the longer term. Existing users will not be afforded sufficient notice to adopt new, more efficient

2 Deloitte Access Economics, Future of Mobile: Reforms to modernise Australia's telecommunications, March 2026. Available at: https://amta.org.au/latest-news/future-of-mobile-modernising-australias-telecommunications-framework/

3 https://apt.int/

4 GSMA. **Vision 2040: Spectrum for the Future of Mobile Connectivity**, November 2025. Available at https://www.gsma.com/newsroom/press-release/6g-mobile-networks-will-need-up-to-three-times-todays-spectrum-to-meet-surging-data-demands-new-gsma-report-shows/

technology, or to move to a different band, forcing delay in the availability of new spectrum, and avoidable pressure on existing users to migrate quickly.

Today, we are already witnessing the consequences of the absence of a National Spectrum Strategy. For example:

- The 2 GHz MSS band is currently the only band capable of supporting 5G-NTN (required for UOMO voice) in the near term with sufficient spectrum for three operators. A National Spectrum Strategy would have identified the importance of this band to the Government's UOMO aspirations, providing the impetus for the ACMA to reconsider the rules for Satellite Network Operator (SNO) licence ownership, and consider adding requirements that the spectrum be used to support UOMO.[5]
- Lack of progress in making additional low-band spectrum available for 6G (i.e., 600 MHz), despite the Minister announcing a review in October 2024. Consequently, it is likely too late to have additional low-band spectrum available in time for a 6G launch by 2030, whereas a National Spectrum Strategy would have identified the importance of assessing the medium to long term directions for broadcast television in Australia, and the importance of additional low-band spectrum for 6G.
- The ACMA's decision to award a further 160 MHz of the upper 6 GHz band (6425–6585 MHz) to RLAN in late 2024 depletes the available mid-band spectrum for 6G. This creates urgent need for a strategy to extend available mid-band spectrum up to 7250 MHz to avoid a scenario where there will be insufficient spectrum for three MNOs to each have 200 MHz of contiguous spectrum; a key requirement for 6G. The decision to award RLAN also appears inconsistent with the National Interest Assessment of the World Radio Conference 2023 (WRC-23) outcomes, tabled in Parliament in February 2025.[6] The Assessment noted that of the candidate frequency bands for IMT considered by WRC-23, "*of key interest to Australia was the 7025-7125 MHz and the directly adjacent 6425-7025 MHz band*", with 7025-7125 MHz ultimately being identified for Asia-Pacific IMT.
- We are also at risk of missed opportunities in planning 6 GHz. An exploration into consolidating Television Outside Broadcast (TOB) usage to fewer operating bands is urgently required to free up this band for 6G IMT. However, rather than look at usage holistically across all bands, the FYSO planning approach treats each individual band in isolation and at a point-in-time, with no regard for future planning. Again, a National Spectrum Strategy would consider all usage holistically, across all bands.
- STM requires nationwide licensing, not just a review of the usage outside spectrum licensed geographies. The Draft FYSO notes[7] the ACMA's intention to investigate the long-term use of the 1800 MHz band in Q4 2026, and we welcome the ACMA's intention to progress the review of this band. However, the ACMA needs to expedite this activity to meet the Government's expectations around UOMO. Rail safety, private networks and point-to-point links are current use cases for the 1800 MHz band, and consideration should be given to moving these use cases to other bands. The automatic renewal of legacy MSS bands (L-, LS- and extended L-bands) should also be reconsidered in the context of the public interest, noting the applicability of these bands for STM and UOMO. A National Spectrum Strategy would consider appropriate spectrum for these use

6 Australian Parliament House, National Interest Analysis of WRC-23,,tabled 10 February 2025, available at: https://www.aph.gov.au/Parliamentary_Business/Tabled_Documents/9285.

7 Draft FYSO, Table 1 p.25 and bottom of p.31.

cases to migrate to. Planning decisions must be made now and embargos put in place to prevent further deployment in this band. We have been calling for this since late 2024.

A vision into the next decade, and the creation of a National Spectrum Strategy, would provide clear objectives to guide policy and decision-making, including spectrum planning activities set through the FYSO.

2.2 Launching 6G in Australia by 2030

Industry commitment to launch 6G in Australia by 2030 should form part of a National Spectrum Strategy. 6G networks will offer myriad new efficiencies and features. It will be the first radio technology to be built around native AI, which will have a large part to play in network management, providing features such as enhanced security, intelligent network optimisation and energy optimisation. 6G networks will be more secure, resilient, energy-efficient, faster and higher capacity than previous generations. A timely 6G launch will also enable us to keep pace with the international community and influence technical standards and preferred bands.[8] For this to happen, the ACMA must move urgently to make sufficient spectrum available. MNOs require a reasonable runway to undertake testing and update equipment to be ready for commercial launch by 2030. Launch by 2030 requires rollout and testing in 2029, which in turn requires spectrum to be made available by that time.

The 6 GHz and the 600 MHz bands should be prioritised as potential 6G bands, recognising these bands are at very different planning stages. The ACMA must take steps to free up at least three contiguous 200 MHz channels in 6 GHz by 2028/2029. With the 600 MHz band, the Government should seek to progress the proposed Future of Broadcasting review as soon as possible, so this can inform future policy directions for 600 MHz spectrum, allowing the ACMA in turn to progress implementation and clearance activities in a timely manner.

6 GHz (6585 – 7250 MHz)

We ask the ACMA to take a holistic approach to 6 GHz to create the right environment for 6G services. The public interest is best supported by the ACMA making available large contiguous blocks of spectrum for 6G deployment in a way that aligns with anticipated international developments (WRC-27 agenda item 1.7). The ACMA's initial identification of 515 MHz of 6 GHz spectrum for mobile use (6585-7100 MHz) can be viewed as a preliminary step toward supporting future 6G services. However, this quantum is insufficient to enable a viable domestic 6G deployment model, particularly if Australia is to support at least three contiguous 200 MHz channels — an outcome increasingly assumed in international 6G discussions.

Internationally, active work is underway on defining a broader mobile identification that would extend the upper boundary of 6 GHz and incorporate portions of the lower 7 GHz range (hence our definition of 6 GHz in this submission as 6585-7250 MHz). In 2025, the European Radio Spectrum Policy Group (RSPG) recommended priority use for IMT in 6585-7125 MHz.[9] This year, RSPG flagged interest in following any WRC-27 decision to expand the frequency range for IMT up to 7250 MHz. RSPG observed that "*the upper 6 GHz band will be the primary band suitable for the introduction of 6G in Europe by 2030… the frequency range for 6G in this band depends on the outcome of the WRC-27* [later noting

[8] Department of Foreign Affairs and Trade, Joint Statement: Endorsing Principles for 6G: Secure, Open, and Resilient by Design – 27 February 2024. Australia joined with international Governments including the US, the UK, Canada and France in agreeing shared principles for advancing 6G networks.

[9] Radio Spectrum Policy Group (RSPG), RSPG25-031 – *Opinion on long-term vision for the upper 6 GHz band*, November 2025, available at: https://radio-spectrum-policy-group.ec.europa.eu/document/download/3301c2fd-7bff-4ecf-bfcd-cfb572a5972f_en?filename=RSPG25-031final-RSPG-Opinion-Upper_6GHz_band.pdf. See para 5.3.

7125-7250 MHz is under study for IMT] *but consists of at least 540 MHz of continuous spectrum. This can contribute to fulfil the mobile industry and operators' demands of additional 200 MHz per operator in mid band spectrum."*[10] Subsequent to the RSPG developments, UK's Ofcom has recently initiated consultation on expanding mobile access in 6 GHz, including 7110–7125 MHz, currently allocated to Programme Making and Special Events (PMSE)[11], and has explicitly foreshadowed mobile priority use of 7125–7250 MHz subject to ongoing European studies.[12]

3GPP is studying new 6G radio and 6G scenarios and requirements. Their technical report[13] defining deployment scenarios to be evaluated includes carrier frequencies "around 7 GHz". This wording was chosen as a proxy for the spectrum already identified for IMT at WRC-23 and the spectrum being investigated for WRC-27. This reflects a broad industry expectation that 6G can be deployed in 6 GHz spectrum as we have defined it in this submission (6585 – 7250 MHz) with anticipated equipment availability and economies of scale.

The ACMA's Draft FYSO acknowledges international developments and observes that "we are now comfortable that there will be a satisfactory ecosystem for WBB devices in the upper 6 GHz band".[14] Accordingly, the ACMA should ensure its spectrum planning work is well aligned with these emerging international directions.

To position Australia credibly for the 6G era, the ACMA should ensure its 6 GHz work plan is attuned to international developments which will unfold over the next 12-18 months and undertake early preparatory activities as soon as possible (e.g. relevant consultations and clearance work). The case for being forward-looking is supported by Australia's WRC-27 positioning, especially its support for mobiles in the 7125-7250 MHz frequency range. By adopting a broader approach to 6 GHz than what is outlined in the draft FYSO and by taking steps now to achieve a single allocation in 2028/2029, the ACMA can materially support Australia's pathway to 6G.

600 MHz band

New low-band spectrum is also required for the advent of 6G, as it is critical for wide coverage and providing reliable services. Making such spectrum available will also avoid the need to re farm 4G and/or 5G spectrum and help meet traffic growth. The 600 MHz band is the most suitable candidate because other low-band spectrum is are already used for 4G and 5G traffic. In October 2024, the then Minister for Communications recognised that the future spectrum requirements of broadcasters currently using 600 MHz could change due to the availability of alternative delivery mechanisms and shifts in consumer preferences (e.g., growth in on-demand streaming) and announced plans to "*explore pathways for the future of television, shaped by the possibility of realising a digital dividend*".[15] A digital dividend would free up spectrum in the 600 MHz band to help meet mobile capacity demand growth and the implementation of 6G.

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10 Radio Spectrum Policy Group (RSPG), RSPG26-004 – Draft RSPG Opinion on a 6G spectrum roadmap, February 2026, available at: https://radio-spectrum-policy-group.ec.europa.eu/document/download/75f0d0e2-9c82-469c-859d-0f48eedf082c_en?filename=RSPG26-004final-DRAFT-RSPG_Opinion_6G_Spectrum_Roadmap_PC.pdf

11 PMSE use cases in the UK are analogous to TOB use cases in Australia

12 Ofcom, https://www.ofcom.org.uk/spectrum/innovative-use-of-spectrum/expanding-access-to-the-6-ghz-band-approach-to-future-mobile-use-and-incumbent-users *Consultation: Expanding access to the 6 GHz band – Our approach to future mobile use in high density areas and incumbent users* (April 2026), available at: https://www.ofcom.org.uk/spectrum/innovative-use-of-spectrum/expanding-access-to-the-6-ghz-band-approach-to-future-mobile-use-and-incumbent-users,. See para 2.14.

13 3GPP, *TR 38.914 – Study on 6G Scenarios and Requirements* (v0.4.0, Mar 2026), https://www.3gpp.org/ftp/Specs/archive/38_series/38.914/38914-040.zip

14 Draft FYSO, p. 37.

15 Minister, The Hon Michelle Rowland keynote speech to the 2024 Radcomms. Available at: https://minister.infrastructure.gov.au/rowland/speech/radcomms-2024-melbourne

Despite its immense potential, industry awaits the Government's policy direction on the 600 MHz. Government direction is likely to be followed by ACMA replanning activity. Relocation of existing TV use will not be a quick process. Steps must be taken now for the band to be reallocated as quickly as possible (ideally, 2030), and by no later than 2032.

2.3 Unlocking spectrum for satellite-to-mobile technology

A National Spectrum Strategy must prioritise the growing role of STM technology. STM presents an exciting development in telecommunications and poses long-term potential to fulfil the objective of the UOMO. It offers the opportunity to extend coverage into areas that have historically been uneconomic or technically challenging for traditional macro networks.

For the STM ecosystem to develop as we hope, suitable spectrum must be allocated. Spectrum for STM must be standardised for NTN (non-terrestrial network) and assigned using nationwide licence(s) because it is not possible to reuse spectrum between STM and terrestrial mobile networks to achieve contiguous coverage without causing detrimental interference. Currently, there is only a limited amount of spectrum (L-band and S-band) which meets the criteria. Maximising the spectrum available for STM has the following benefits:

- supporting long-term fulfilment of the UOMO;
- helping meet STM demand growth while avoiding the need for MNOs to make trade-offs with terrestrial-based connectivity; and
- protecting Australia's sovereign interest through the licensing arrangements offered for these bands.

As with 6G, the industry needs early allocation certainty of new STM bands and sufficient lead-time to allow for device updates to 5G NR NTN, equipment upgrades and commercial service roll-out.

2 GHz MSS allocation

We welcome the ACMA's progress towards allocation of the 2 GHz Mobile Satellite Service (MSS) band. Traditionally MSS spectrum is offered only to satellite network operators (SNOs). Telstra believes it is in the national interest that this band is allocated via a mechanism which maintains flexibility for the MNOs who bear the responsibility for delivering UOMO, to change SNOs over time. Doing so will ensure continuity of service for Australian consumers, avoid scarce spectrum resources becoming inaccessible to the MNOs and ensure sovereign control of spectrum is maintained.

1800 MHz IMT band

Over the medium term, additional spectrum is needed for STM to keep pace with demand. The 1800 MHz band could be replanned to achieve nationwide spectrum licensing, making it suitable for STM. Incumbent licensees in the 1800 MHz band could be relocated to the 2100 MHz band as appropriate (e.g. private networks for mining in remote Australia). We support the ACMA's intention to release a discussion paper on the long-term use of the 1800 MHz band, however, believe this should occur earlier than Q4 2026. [16] We also note that the ACMA plans to consult on 1800 MHz and 2 GHz bands outside of spectrum-licensed areas prior to this discussion paper, in Q3. We suggest that any decisions regarding the latter spectrum be postponed until the future use of the 1800 MHz has been examined holistically. There is otherwise a risk of the ACMA making allocation decisions regarding the 1800 MHz and 2 GHz

[16] Draft FYSO, p. 25.

bands outside of spectrum-licensed areas which ultimately constrain the ACMA's freedom in making long-term decisions on the future of the 1800 MHz.

Candidate 3GPP NTN bands (MSS spectrum)

Equally important to configuring IMT bands (such as 1800 MHz) for possible STM use is the need to look at candidate 3GPP NTN bands across L-band and S-band. Today, a reasonable proportion of this spectrum is licensed (on annual apparatus licences) to satellite operators. As part of a National Spectrum Strategy, we recommend the ACMA introduce a new item into its work plan to review potential MSS spectrum candidate bands for STM and UOMO. The ACMA should re-examine the public interest criteria for automatic renewals of these MSS bands to determine whether renewal of the incumbent licences best serves the public interest, or whether repurposing the spectrum to STM and UOMO presents a higher value use case. We cover this in greater detail in section 4.1.

2.4 Enhancing the quality and utility of spectrum

A National Spectrum Strategy should also prioritise spectrum management settings that enhance the quality and utility of Australia's spectrum. For instance, we encourage the ACMA to undertake defragmentation work that results in wider contiguous spectrum blocks — this is critical to achieving higher performance, simplifying network deployment and improving efficiency. This work will also support a faster 6G roll-out in the years ahead.

As a starting point, we call on the ACMA to reconsider its current preference for an industry-led approach to defragmentation in the 3.x GHz bands and instead adopt a structured, regulator-led facilitation model similar to the successful 1800 MHz precedent in 2013. Defragmentation work across the 3.x GHz bands should be holistic rather than in single band segments.

In chapter 4, we suggest several items to enhance the utility of spectrum, including a review of the use of ESPZs and metro/peri-urban teleports, removing the restriction on 3.7 GHz base-station in-band EIRP to support more flexible spectrum trading and defragmentation, and wider channel sizes for fixed links.

3 Comments on the ACMA's Draft FYSO and work program

In the previous chapter, we covered 6 GHz, 600 MHz, 2 GHz MSS band and the long-term use of the 1800 MHz band, as these items are integral to the National Spectrum Strategy. In this chapter, we respond to specific items in the ACMA's FYSO program and 2026-27 work plan that we would like to see changed or supplemented, and we comment on other Draft FYSO topics not previously covered.

3.1 Items in Part 1: Draft Five-Year Spectrum Outlook, 2026-2031

This section contains our comments on elements in the ACMA's five-year planning horizon (Part 1 of the Draft FYSO). As the ACMA notes, Part 1 of the Draft FYSO provides an outlook of the trends in markets, technology and spectrum uses that inform the ACMA's medium-term planning, allocation and re-allocation activities.

3.1.1 Spectrum Sharing

Part 1 of the Draft FYSO contains a section on spectrum sharing,[17] in which the ACMA distinguishes between spectrum sharing in its traditional form and 'non-traditional' sharing arrangements, most notably dynamic spectrum access regimes. The Draft FYSO indicates a willingness to consider proposals of new (dynamic) approaches to spectrum sharing.

Traditional sharing methods, such as coordination measures captured in the RAGs and RALIs, are critical tools for ensuring the optimal use of spectrum. However, we are strongly opposed to **dynamic spectrum access regimes that allow for pre-emption** and ad hoc coordination. These arrangements provide insufficient certainty to support long-term infrastructure investment, carry the risk of service disruption and therefore cannot promote the long-term public interest. For example, Telstra operates licensed point-to-point (PTP) links in the 6 GHz band, which it uses for backhaul for mobile services and some legacy copper services. Dynamic spectrum sharing methodologies in this band, such as the proposal for Automatic Frequency Control (AFC) for lower-6 GHz devices, introduces a material risk of unintended interference by raising the noise floor. This could compromise call routing, degrade voice quality, or prevent emergency calls from connecting altogether - outcomes that would have catastrophic consequences for public safety. Given the life-critical nature of these communications, preserving a highly protected and interference-free operating environment remains our paramount concern.

The coordination requirements for dynamic spectrum access regimes are far more complex compared to traditional sharing methods and have more potential failure points. Further, dynamic sharing arrangements that require lower priority users give way to a higher priority user mean that the lower priority users' commercial services are at risk of disruption or losing access to the spectrum altogether. It is therefore difficult to see how this arrangement is beneficial for spectrum users or consumers.

We note the development of spectrum sharing frameworks such as the Citizens' Band Radio Service (CBRS) in the United States, and Wi-Fi / mobile sharing technologies such as Licensed Assisted Access (LAA), which have been commercially unsuccessful. Their use has largely been confined to niche or localised applications. Database-driven coordination systems such as AFC (as explicitly referenced in the Draft FYSO) [18] are nascent and have the potential to disturb more strategic band planning (see our comments in section 3.2.2 below). Overall, our view is that dynamic spectrum access regimes are immature, are not experiencing compelling success, so we remain strongly opposed to their introduction.

[17] Draft FYSO, p.19.
[18] Draft FYSO, p.20.

If, despite our opposition, the ACMA goes down the path of exploring dynamic spectrum access regimes, as one of the regulators responsible for the provision of communications services supplied to the public (the other being the ACCC), we propose the ACMA could add an item to its work plan (see section 4.2) to develop **guidance for service providers** (such as WISPs) wishing to develop commercial service offerings based on preemptable spectrum.

3.2 Items in Part 2: 2026-27 Work Plan

This section contains our comments on elements in the ACMA's work plan for 2026-27 (Part 2 of the Draft FYSO).

3.2.1 Act now to achieve a single allocation of 6 GHz by late 2028 or early 2029

For Australia to achieve a timely launch of 6G, the ACMA must act now to free up as much spectrum as possible in 6 GHz (6585-7250 MHz) for IMT. There are two essential considerations to make this band suitable for 6G. Firstly, it is critical that the spectrum is subject to a single allocation process, and secondly, it is vital that large contiguous blocks of at least 200 MHz bandwidth are made available for each network operator. By doing this, the ACMA will ensure that industry deploys this spectrum to optimal use. We must avoid fragmented allocation processes like in the 3.x GHz band.

We consider there are various ways the ACMA could go about this. For example, to make a single block of spectrum in 6 GHz available, the ACMA could consider adding a consultation on replanning the 7.2 GHz (7100-7425 MHz) band to its 2026-27 work plan. The ACMA could skip the monitoring stage of band-planning and move directly to initial investigation for this band.[19] We note the ACMA's recent planning decision that TVOB retain 7100-7125 MHz, however, we urge the ACMA to reconsider this decision in favour of strategic 6G planning. A 7.2 GHz consultation would facilitate the ACMA's unwinding of both the 7100-7125 MHz[20] and 7125-7250 MHz[21] planning decisions to retain this spectrum for TOB and would enable the ACMA to compress TOB's allocation in this band.

We note the ACMA's annual work plan captures implementation work for 6585-7100 MHz (to reflect its December 2024 decision to allocate this spectrum to IMT),[22] and we refer to the recent decision of the Australian delegation to the ITU-R WRC-27 supporting the identification of 7125-7250 MHz for IMT.[23] We ask the ACMA to bring the entire 6 GHz (6585-7250 MHz) to market in a single allocation process by late 2028 or very early 2029 following the earlier completion of the preceding steps.

We note that the ITU-R WRC-27 process may identify more than 7125-7250 MHz for IMT. The ACMA's approach should (and can) remain open to this possibility.

Whichever path the ACMA chooses to free up this spectrum for IMT, we urge the ACMA to land on a preferred plan and embark upon it without delay.

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19 The typical band-planning stages are: monitoring, initial investigation, preliminary replanning, implementation – see Draft FYSO, p. 24. The ACMA has advised that bands may "jump" planning stages if the circumstances warrant it.

20 TOB's holding of 7100-7125 MHz was preserved in the ACMA Outcomes Paper – "Future use of the upper 6 GHz band" (17 Dec 2024)

21 This allocation derives from a 2022 7.2 GHz band replan. RALI FX21 (channel arrangement October 2022 update) confirmed this spectrum remains designated for TOV.

22 Draft FYSO, p.25, consultation on proposed licensing approach planned for Q4 2026.

23 Australian Preliminary Views on WRC-27 agenda items - February 2026. Available at: https://www.infrastructure.gov.au/sites/default/files/documents/australian-preliminary-views-on-wrc-27-agenda-items-february-2026.pdf

3.2.2 Place AFC in 6 GHz band on hold, until WBB in 6 GHz is determined

The Draft FYSO foreshadows an options paper being released on higher-powered AFC RLAN arrangements. We respectfully request the ACMA place further work on AFC on hold, including deployment/use outside metro and regional areas, until the future of 6 GHz is resolved. To support Australia's readiness for 6G by 2030, the ACMA's priority must be to create the largest contiguous block possible for mobile WBB in 6 GHz. Additionally, the ACMA and industry need to define the geographic areas that will be used for spectrum-licensed WBB services, which we consider should include regional areas. The early deployment of AFC systems, and/or the issuance of area-wide licences for higher-powered (outdoor) RLAN devices, even below the 6585 MHz boundary creates risk of constraining the availability of high-quality spectrum for 6G WBB.

It also makes sense for AFC technology to be a secondary consideration to creating an allocation of high-quality spectrum for 6G in 6 GHz, as AFC systems are designed to work around prioritised use of spectrum, such as WBB allocations and PTP links. As noted in our January 2026 submission to the ACMA's Discussion Paper on AFC, the AFC system remains largely untested in real-world environments, and therefore delaying this work stream will give AFC technology time to develop.

The ACMA should place further activity on AFC use in the overall 6 GHz band on hold, until holistic planning decisions can be made for an allocation of spectrum for WBB, and the future of 6.7 GHz PTP links, that will inevitably be displaced and some of which will move to the 6 GHz PTP band.

3.2.3 Different sequencing in considering the 1800 MHz band

We support the ACMA's intention to release a discussion paper on the long-term use of the 1800 MHz band noting its potential as a STM band, however, we believe this should occur earlier than Q4 2026.[24] We also note that the ACMA plans to consult on 1800 MHz and 2 GHz bands outside of spectrum-licensed areas in Q3, prior to the long-term use discussion paper. We suggest that any decisions regarding the latter spectrum be postponed until the future use of the 1800 MHz has been examined holistically. There is otherwise a risk of the ACMA making allocation decisions regarding the 1800 MHz and 2 GHz bands outside of spectrum-licensed areas which ultimately constrain the ACMA's freedom in making long-term decisions on the future of the 1800 MHz (such as the possibility of creating a nation-wide licence to support delivery of UOMO).

3.2.4 Remove Secondary Licensing Framework (SLF) from the work plan

The Draft FYSO notes the ACMA is "… *continuing to consider the merits of a secondary licensing framework*",[25] and that this is being done with the Department, following a request from the former Communications Minister. As we have explained in previous submission(s) to various rounds of the ACMA's ESL process, the ability for the regulator to issue additional licences across spectrum licences, even with pre-emption rights to reclaim the spectrum as/when required, diminishes the value of the spectrum. If the government plans to introduce a SLF scheme, it must be revealed prior to the renewal prices being released. Given the outcomes paper for the pricing component of Stage 4 is scheduled for release in mid-May, and this is the Draft FYSO for 2026-27 and beyond, SLF can now be removed from the ACMA's work plan altogether, as an SLF would have to be completed in FY26.

3.2.5 Consultation on the "UOMO Work Program"

The Draft FYSO contains an item for the creation of a UOMO Work Program, that amongst other things will consider how the provision of D2D services required by the UOMO could be authorised in Australia's

[24] Draft FYSO, p. 25.
[25] Draft FYSO, p.53.

external territories that sit outside boundary of licences.[26] The ACMA also notes it will be "… *responsible for the enforcement of any UOMO standards, rules or benchmarks that may be applied to services, which the ACMA already enforces in relation to existing universal service arrangements*."[27] To this point, we expect the ACMA will also play a key role in the creation of any UOMO standards, rules or benchmarks that the Minister chooses to set, (under the provisions of the UOMO Bill, once it is enacted into legislation).

It is very important the ACMA consults, and works collaboratively with industry, both the named primary universal outdoor mobile providers (PUOMPs) and satellite operators in the setting of UOMO standards, rules or benchmarks. We also consider the creation of these standards will be instrumental in setting community expectations of the capability of a UOMO service, and if this work is to be conducted as part of an 2026-27 UOMO Work Plan, it will be at a point in time where the technology is still in an early stage of maturity.

We would welcome the opportunity to discuss the ACMA's foreshadowed UOMO Work Plan while it is in development.

3.2.6 Deprioritise work on 1.5 GHz band

We appreciate the ACMA's desire to move forward with a 1.5 GHz consultation in Q2 2026. However, at this time, it is not clear to us how 1.5 GHz can be most effectively used. Given frequencies below 1518 MHz are only designated for terrestrial (Fixed or Mobile) use, this band could only be used terrestrially. While options for terrestrial use of this spectrum exist (e.g., 3GPP Band 74 in FDD configuration, or 3GPP bands 75 and 76 in supplemental downlink (SDL) configuration), it will be difficult to determine the best long-term use of the band by looking solely at this band in isolation. A holistic view, that considers other bands, terrestrial and non-terrestrial applications, and equipment (network and user equipment) capabilities is required, which we address this in section 4.1 of our submission.

Ahead of that, we recommend the ACMA delay the release of its next consultation paper on the 1.5 GHz band until a public interest review of the renewal of incumbent licences in potential MSS spectrum candidate bands for STM and UOMO is completed.

[26] Draft FYSO, p.55.
[27] Draft FYSO, p.13.

4 New work items for the Draft FYSO and work program

This section contains our suggestions for items to add to the Draft FYSO and work program.

4.1 Consider broader MSS spectrum as part of a holistic, National Spectrum Strategy

We request the ACMA add a new work item to review potential MSS spectrum candidate bands for STM and UOMO to both its long-term (five-year) horizon and as a specific activity in FY2026-27. We consider all potential 3GPP NTN bands should be considered in an overarching National Spectrum Strategy (see section 2.3) that explores long-term UOMO and commercial STM needs holistically. 3GPP Release 19 contains seven bands across L- and S-Bands designated for NTN (plus a further two in Ku-Band) as per Table 1 below.

NTN satellite operating band	Uplink (UL) operating band Satellite Access Node receive / UE transmit $F_{UL,low}$ – $F_{UL,high}$	Downlink (DL) operating band Satellite Access Node transmit / UE receive $F_{DL,low}$ – $F_{DL,high}$	Duplex mode
n256	1980 MHz – 2010 MHz	2170 MHz – 2200 MHz	FDD
n255	1626.5 MHz – 1660.5 MHz	1525 MHz – 1559 MHz	FDD
n254	1610 – 1626.5 MHz	2483.5 – 2500 MHz	FDD
n253	1668 MHz – 1675 MHz	1518 MHz – 1525 MHz	FDD
n252	2000 – 2020 MHz	2180 – 2200 MHz	FDD
n251	1626.5 MHz – 1660.5 MHz	1518 MHz – 1559 MHz	FDD
n250	1668 MHz – 1675 MHz	1518 MHz – 1559 MHz	FDD
n248	14000 MHz - 14500 MHz	10700 MHz – 127502,3 MHz	FDD
n247	13750 MHz - 14000 MHz	10700 MHz – 127502,3 MHz	FDD
NOTE 1: NTN satellite bands are numbered in descending order from n256. NOTE 2: For Region 2, the downlink is limited to 10700 – 12700 MHz. NOTE 3: For the US, the downlink is limited to 10700 – 12200 MHz for Mobile VSAT. NOTE 4: Operating band n200 is a reserved value.			

Table 1: Replica of 3GPP TS 38.101-5 Table 5.2.2-1, NTN satellite bands in FR1-NTN [28]

The new work item to review potential MSS spectrum candidate bands for STM and UOMO should consider L-band, extend L-band and S-band, especially those frequencies for designated 3GPP NTN bands (as per Table 1). The emphasis should be on re-examining the public interest criteria for automatic renewals of these MSS bands to determine whether renewal of the incumbent licences best serves the public interest, or whether repurposing the spectrum to STM and UOMO presents a higher value use case than the continuation of legacy technologies that benefit a small number of users.

Separate to any work to review potential MSS spectrum candidate bands for STM and UOMO, we consider the 1.5 GHz band (1427–1535 MHz) for IMT should be deprioritised, as we discussed in section 3.2.6. The ACMA should consider delaying the release of its next consultation paper on the 1.5 GHz band until the National Spectrum Strategy is developed.

4.2 Develop guidance for users of future dynamic spectrum sharing schemes

As we note in section 3.1.1 on potential future dynamic spectrum sharing schemes, we have concerns that if future dynamic spectrum sharing schemes are adopted by service providers (for example, WISPs)

[28] 3GPP specification TS 38.101-5, Ver 19.3.0, Feb 2026. Available at: https://www.etsi.org/deliver/etsi_ts/138100_138199/13810105/19.03.00_60/ts_13810105v190300p.pdf

to offer commercial services to consumers, there is a reasonable risk of disruption to a preemptable (lower priority) operator and the service they supply.

We propose the ACMA should add an item to its work plan to develop **guidance for service providers** (such as WISPs) wishing to develop commercial service offerings based on preemptable spectrum. The guidance could explain the importance of developing supply contracts that recognise the preemptable nature of the underlying spectrum that the service is built on, and that end users should prepare themselves with backup alternatives, should the spectrum be pre-empted.

Helpful guidance could also outline other service provider obligations, such as those associated with holding a carrier licence.

4.3 Registration exemption limits in the 3.x GHz band

We propose the ACMA add a work item in either FY2026-27 or the following year (i.e., ahead of the band's review as part of the ESL project), to review the registration exemption threshold that applies to transmitters in the 3.4 GHz band so that those limits align with those specified by 3GPP.

3GPP TS 38.101 makes provision for High Power User Equipment (HPUE) to operate in the 3.4 GHz band (3GPP bands n78 and n77) with up to 33 dBm TRP (i.e. with a nominal output power of up to 31 dBm with a +2/-3 dB tolerance). This capability only applies to User Equipment which is used for fixed-wireless applications. This higher power limit does not apply to consumer devices and would be supplied in a form factor only suitable for fixed-wireless applications.

4.4 Review of Earth Station Protection Zones in 3700 – 4200 MHz (C Band)

We encourage the ACMA to review the use and location of existing ESPZs, especially in the 3400 – 4200 MHz range. It is our view that the ESPZs are currently unused (or at least under-used) in this range, yet the ESPZ causes spectrum denial in the vicinity, which prevents the deployment of higher capacity 5G capabilities on C-band.

The coordination between IMT in the 3.4 GHz band and C-band earth stations in Australia relies on the relevant Radiocommunications Advisory Guidelines[29] (RAG – Tx 3.4 GHz) which in turn references two important RALIs

- RALI MS44 "*Frequency coordination procedures for the earth station protection zones*" is intended to a) afford protection to earth station receivers, as well as b) detail the coordination procedure for Notional earth station transmitters operating in certain frequency ranges in five defined geographies around Australia.[30]
- RALI MS47 "Frequency coordination and licensing procedures for Area-Wide Licences (AWL) in the 3400–4000 MHz band".[31]

[29] Radiocommunications Advisory Guidelines (Managing Interference from Spectrum Licensed Transmitters – 3.4 GHz Band) 2025 https://www.legislation.gov.au/F2025L01051/latest/text

[30] RALI MS44: Frequency coordination procedures for the earth station protection zones https://www.acma.gov.au/publications/2019-08/instruction/frequency-coordination-procedures-earth-station-protection-zones

[31] RALI MS47: Licensing and coordination procedures for area-wide licences (AWL) in the 3400–4000 MHz band https://www.acma.gov.au/publications/2023-06/instruction/rali-ms47-licensing-and-coordination-procedures-area-wide-licences-awl-3400-4000-mhz-band

We note RALI MS44 has been in force since 2018. As of May 2026, the RRL shows that very few licensees have taken up the option to deploy earth stations inside the ESPZs. Our concern is the limitations imposed by MS44 precludes deployment of both fixed wireless access services (in the case of nbn co) and 5G mobile services by all three Mobile Network Operators.

The RRL shows that in three of the ESPZs (Quirindi (NSW), Moree (NSW) and Roma (Qld)), there are no C-band satellite receive services to protect in the entire 3400-4200 MHz band. Indeed, there are no services to protect in the other frequency ranges listed in the Appendices of RALI MS44, with one small exception being the Ka Band earth station operated by nbn Co near Roma (Qld).

In ACMA's 2021 outcomes paper[32] regarding 'Replanning the 3700-4200 MHz band', we note ACMA acknowledges the need to rationalise the east coast ESPZ's with the following comment: *"The ACMA reaffirms its intent to retain at least one ESPZ in Western Australia and one in eastern Australia (in addition to the smaller Uralla ESPZ), which will include protection for FSS earth station receivers in the band. Depending on usage of the existing ESPZs the ACMA may look at rationalising the eastern Australia ESPZs at the end of any re-allocation/transition period affecting FSS services, noting that as of the release of the options paper there were no FSS receivers registered in the band in any eastern Australia ESPZ except Uralla. The Uralla ESPZ only provides protection for non-geostationary satellite orbits"*. This is an important first step, however widening the scope to consider the factors raised here may lead to more efficient use of the available spectrum.

We propose the ACMA introduce a work item into the FY2026-27 work plan to review the use of ESPZs in C-Band. That review should include the possibility of encouraging C-band teleports in metro and peri-urban centres to the ESPZs, which we discuss next.

4.5 Review metro and peri-urban teleports, with a view to encouraging them to ESPZs

In addition to C-band denial around ESPZs, there is a commensurate concern about C-band denial around metro and peri-urban teleports, which also impose real limitations on deployment of 5G networks in densely populated areas of some capital cities. One possible solution could include reviewing RALIs and RAGs to determine whether there is scope to investigate technical solutions to improve the coexistence between C-band satellite receivers and 5G base stations.

Another solution could involve encouraging metro and peri-urban teleports to relocate to ESPZs, although, this potentially denies the ability to rationalise ESPZs (as outlined in section 4.4). The challenge, to the greatest extent possible, is to rationalise ESPZs where there is little prospect of genuine use, while simultaneously taking active steps to relocate teleports from metro and peri-urban areas. Of course, both can be achieved to some extent, if the metro and peri-urban teleports relocate to only one or two of the ESPZs, rather than splayed across all four. This is an example of where a holistic approach to future planning under a National Spectrum Strategy would deliver tangible benefits to both urban and regional communities.

[32] Replanning the 3700-4200 MHz band: Outcomes paper https://www.acma.gov.au/sites/default/files/2021-01/Replanning%20the%203700-4200%20MHz%20band_Outcomes%20paper.docx

4.6 Remove power limit for 3.7 GHz base station transmitters

Telstra continues to advocate for the in-band EIRP (Effective Isotropic Radiated Power) limit imposed on base station transmitters operating above 3700 MHz to be removed. We recognise the reasons that led ACMA to create such a limit, however we wish to emphasise that any disparity between power limits that apply between 3400 and 3700 MHz, and those above 3700 MHz inhibits the ability of existing spectrum licensees to trade 'like-for-like' spectrum in order to realise less fragmented spectrum holdings in the band. We accept the localised voluntary constraints around airports where necessary, however the national transmit power constraint is indefensible and should be removed immediately.

4.7 Wider Point-to-Point channels and non-prioritised TOB use of 13 GHz PTP band

We currently use the 6 GHz (5925 - 6425 MHz), 6.7 GHz (6425 - 7110 MHz), 8 GHz (7725 - 8275 MHz), 11 GHz (10.7 - 11.7 GHz) and 18 GHz (17.7 - 19.7 GHz) bands to provide backhaul capacity to support a range of services including USO services in regional and remote areas, and mobile and enterprise services in metro areas. nbn Co., other MNOs and broadcasters are also heavy users of these bands for point-to-point links.

A reallocation of 6 GHz in the near term (which Telstra supports – see section 2.2 above), will necessitate the clearance of point-to-point links in the 6.7 GHz (6425 – 7100 MHz). It is therefore important that the ACMA consider providing 112 MHz channels in other bands for point-to-point links to optimise the remaining spectrum available for this use. Wider channels will support higher capacity backhaul radio links (up to 4 times the capacity per link i.e. 4 x 28 MHz channel or 2 x 56 MHz channel) without the need for additional infrastructure and the extra cost. Several equipment manufacturers offer equipment supporting 112 MHz channels in the 6 GHz (relevant to point-to-point lower 6 GHz licences), 8 GHz, 18 GHz, 23 GHz and 38 GHz bands.

We also ask the ACMA to consider replanning the 13 GHz (12.75 – 13.25 GHz). This band is currently fragmented due to it supporting both point-to-point licensees and TOB use. Accordingly, it is not serving either use case to its highest potential. The 13 GHz band has the potential to be used more widely for point-to-point services that may have been displaced from lower frequency bands as demands for that lower-band spectrum increases as noted above. As part of the ACMA's consideration of 6 GHz and a potential compression of TOB, we ask the ACMA to take a holistic view of the current and future spectrum needs for TOB applications. This would necessarily include an assessment of how TOB currently uses the 7 GHz band and what scope there may be to more efficiently use the available spectrum.

5 Prioritisation of activities in the FYSO and work program

Drawing together our commentary from the previous sections, Table 3 below contains our view on the prioritisation of activities in the ACMA's FYSO and work program.

Key priorities:		
1. Launching **6G launch** by 2030 (deployment in 2029) 2. Unlocking spectrum for **STM technology** 3. Protecting and enhancing the **value of Australia's spectrum**		
Work plan activity	**Key relevance**	**Summary of Telstra's position**
1. 6 GHz (6585-7250 MHz)	6G	The ACMA should take steps now to free up 6585-7250 MHz (see section 2.2) and aim to hold a single auction toward the end of 2028 or early 2029. The mobile industry needs access to this spectrum by 2029 for deployment ahead of a 2030 launch of 6G. See section 2.2. On a related note – we consider there is insufficient demand to justify the introduction of Automatic Frequency Coordination (AFC) for Standard Power devices in any part of the 6 GHz band and that the ACMA should pause this work until it has decided on the future of the band. See section 3.2.1.
2. Allocation of 600 MHz (612 – 703 MHz)	6G, STM	Steps must be taken toward creating a second digital dividend in 600 MHz to support Australia's 6G roll-out. The band should be reallocated as quickly as possible (ideally by 2030), and by no later than 2032. See sections 2.2 and 2.3. We acknowledge the ACMA's actions in this band are contingent on Government policy decisions regarding the future of Free to Air TV.
3. 2 GHz MSS band allocation	STM	We welcome the ACMA's continued focus on bringing this band to market. Telstra believes it is in the national interest that this band is allocated via a mechanism which maintains flexibility for the MNOs who bear the responsibility of delivering UOMO to change SNOs over time. See section 2.3.
4. Broader review of MSS spectrum	STM	We request the ACMA add a new work item to review potential MSS spectrum candidate bands for STM and UOMO. To encourage competition and choice of STM SNOs, all potential 3GPP NTN bands should be considered, including automatic renewals of L-band and S-band MSS spectrum and whether that meets the long-term public interest.
5. Rationalisation of 1800 / 2100 MHz	STM; enhancing spectrum quality and utility	The ACMA should consider licensing the 1800 MHz band on a nation-wide basis to support MNOs deliver UOMO, while minimising impact to terrestrial mobile networks. We support the ACMA releasing a discussion paper on the long-term use of the 1800 MHz band but believe this activity should be expedited. We suggest that any decisions regarding the 1800 MHz and 2 GHz outside of spectrum-licensed areas be postponed until the long-term use of the 1800 MHz has been properly examined to avoid decisions that constrain long-term planning. See section 2.3.

Key priorities:		
1. Launching **6G launch** by 2030 (deployment in 2029) 2. Unlocking spectrum for **STM technology** 3. Protecting and enhancing the **value of Australia's spectrum**		
Work plan activity	**Key relevance**	**Summary of Telstra's position**
6. Defragment spectrum in the 850 MHz, 3.4/3.6/3.7 GHz bands	Enhancing spectrum quality and utility	We call on the ACMA to reconsider its current preference for an industry-led approach to defragmentation in these bands and instead adopt a structured, regulator-led facilitation model similar to the successful 2013 1800 MHz precedent. Defragmentation work across the 3.x GHz bands should be holistic rather than in single band segments. This work will facilitate more efficient use of spectrum. See section 2.4.
7. Review of Earth Station Protection Zones (ESPZ) in 3700 – 4200 MHz (C Band)	Enhancing spectrum quality and utility	We encourage the ACMA to commence a review of the current and planned use of ESPZs, as we are concerned the zones remain underutilised and deny access to spectrum that could be used to deliver higher quality mobile services in the surrounding region. We also encourage the ACMA to simultaneously review metro and peri-urban teleports in C-band with a view to developing a migration roadmap (as part of a National Spectrum Strategy) to encourage teleports causing spectrum denial to move to ESPZs.
8. Monitoring of the 4400-4800 MHz, 7125-8400 MHz and 14.8-15.35 GHz	6G	A pipeline of future spectrum supply is essential to meet the demands of IMT growth in the next decade. We encourage the ACMA to continue monitoring these bands, which are a key focus for international spectrum management.
9. Higher Power Registration exemption limits across the board for mobiles to cater for developments in UE capabilities	Enhancing spectrum quality and utility	The ACMA should introduce higher power registration exemption limits in the 3.x GHz bands ahead of the bands being assessed for technical capabilities in 2028 under the ESL process. See section 4.3.
10. More microwave band capacity for fixed links	Enhancing spectrum quality and utility	There is an opportunity in the short-medium term to optimise some of the existing bands allocated to high-capacity fixed point-to-point links by introducing wider channels. See section 4.7.
11. 1.5 GHz (1427–1535 MHz) IMT.	6G	We consider this work should be deprioritised, until a review of candidate MSS spectrum bands that could be used for STM and/or UOMO is conducted (as described in section 4.1)