

---

## Submission

22 August 2024

Spectrum Licensing Policy Section  
Australian Communications and Media Authority

**Re: Our approach to radiocommunications licensing and allocation 2024**

The Australian Communications Consumer Action Network (ACCAN) thanks the Australian Communications and Media Authority (ACMA) for the opportunity to comment on its 'Our approach to radiocommunications licensing and allocation 2024' information paper (**the Information Paper**).

ACCAN is the peak body that represents consumers on communications issues including telecommunications, broadband, and emerging new services. ACCAN provides a strong unified voice to industry and government as we work towards communications services that are trusted, inclusive and available for all.

The framework for planning and allocating spectrum underpins the efficient delivery of communications services in the interests of consumers, small businesses, and the broader community as end users of spectrum. Fit-for-purpose planning and allocation frameworks are critical to promote the public interest through the allocation of finite spectrum resources.

ACCAN welcomes the publication of the Information Paper and looks forward to further engagement with the ACMA on spectrum licensing and allocation decisions. ACCAN would suggest the ACMA consider how to expand the number of core spectrum license conditions which may be modified.<sup>1</sup> ACCAN considers that empowering the ACMA to modify a greater number of licence conditions in response to non-compliance by licence holders would contribute to more effective enforcement outcomes. ACCAN would support a public consultation being undertaken on any proposed changes to the ACMA's ability to modify licence conditions.

We thank the ACMA for the opportunity to comment on the Information Paper. Should you wish to discuss any of the issues raised in this submission further, please do not hesitate to contact me at [con.gouskos@accan.org.au](mailto:con.gouskos@accan.org.au).

Yours sincerely,

Con Gouskos  
Policy Adviser

---

*The Australian Communications Consumer Action Network (ACCAN) is Australia's peak communication consumer organisation. The operation of ACCAN is made possible by funding provided by the Commonwealth of Australia under section 593 of the Telecommunications Act 1997. This funding is recovered from charges on*

---

<sup>1</sup> ACMA. 2024. Our approach to radiocommunications licensing and allocation (8).

**telecommunications carriers. ACCAN is committed to reconciliation that acknowledges Australia's past and values the unique culture and heritage of Aboriginal and Torres Strait Islander peoples. [Read our RAP.](#)**

---