



11th August 2017

The Manager, Spectrum Planning Section
Australian Communications and Media Authority

ACCAN wishes to thank the ACMA for the opportunity to comment on its Future Use of the 3.6GHz Band Options Paper.

5G mobile broadband services are expected to deliver many benefits and increased capacity services for consumers.¹ There are substantial benefits to using the 3.6GHz band for 5G services.

However, the 3.6GHz spectrum is currently supporting vital broadband services in regional and remote areas. Many of ACCAN members rely on the tens of Wireless Internet Service Providers (WISPs) that operate in this band outside of metro areas. For businesses, those waiting on NBN services to be available and those that need more from a service (in terms of increased capacity or reliability) than what is generally available in these areas - WISPs are often the only option.²

ACCAN recommends WISP services to consumers on our website and when consumers contact us directly.³ Some of these consumers have no mobile coverage and wireless services have brought significant improvements in their connectivity and business productivity. ACCAN is concerned about the future of these services and the potential impact on the consumers and businesses relying on them if policy settings are not calibrated correctly. For the consumers depending on these services, we believe the highest benefit comes from keeping the services that are available.

Our concerns stem from the following issues with the preferred option:

- a) The proposed seven year period is likely to be shorter than the time any prospective spectrum licence holder will be in a position to use the spectrum in these areas, if they do in fact use it to offer services to all of these consumers. Telstra have suggested providing incumbents with a longer period (10-15 years) to vacate the spectrum, which may indicate that they have no pressing need for the spectrum in all the areas where it is currently being used.⁴ ACCAN is concerned that the proposal will remove these vital and innovative services, leaving many consumers with sub optimal or no services.

¹ Jock Given, 5G's New Frontier. <http://insidestory.org.au/5gs-new-frontier/>

² ABC, Data drought: Rural Australians find alternative ways to get online despite Sky Muster rollout. 8th October 2016. <http://www.abc.net.au/news/2016-10-08/rural-australians-find-alternative-ways-to-get-online/7913328>

³ ACCAN, Six helpful steps if you can't get a broadband service. <https://accan.org.au/broadband/get-connected/adsl-solutions>

⁴ Telstra letter to ACMA, May 2016. [http://www.acma.gov.au/~media/Spectrum%20Transformation%20and%20Government/Issue%20for%20Comment/IFC%2025%202016/Telstra%20supplementary%20submission%20pdf.pdf](http://www.acma.gov.au/~/media/Spectrum%20Transformation%20and%20Government/Issue%20for%20Comment/IFC%2025%202016/Telstra%20supplementary%20submission%20pdf.pdf)



- b) There is no formal way to ensure that prospective licensees will share the spectrum with the incumbents. While a number of prospective mobile providers have indicated that they are open to discussing sharing options, they have also indicated that this may slow down the process.⁵ ACCAN is concerned that any proposed sharing arrangement is not guaranteed through a formal approach. In areas where prospective mobile providers may use the spectrum, they may not be willing to share, and make arrangements overly complex or withdraw the offer after a short period. After all, the prospective providers may be competing with the incumbents, whether through competing mobile services or services they offer over the NBN network. It may not be in their interest to assist a WISP's use of spectrum under its control.

- c) The alternative proposed reallocation to the 5.6GHz band comes at a cost to WISPs and consumers. Additionally, ACCAN understands that there may be significant challenges in terms of ensuring that this band does not suffer from interference issues. This may reduce the capacity for WISPs to offer innovative service solutions for consumers and businesses in regional and remote areas.

The availability of services in regional and remote areas is vitally important. Spectrum allocation should continue to support the provision of services to all consumers and support a variety of providers to deliver innovative solutions to consumers.

ACCAN supports the ACMA progressing 'Area 1' immediately. ACCAN also supports the re-farming for the additional areas (2 and 3), but believes that further consideration is required into the potential detriment resulting from reduced competition and service availability in these areas. Consideration could be sought from the ACCC in relation to these issues.

Yours sincerely

A handwritten signature in blue ink that reads "Rachel Thomas". The signature is written in a cursive, flowing style.

Rachel Thomas
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⁵ Zdnet, Telco groups at war over 5G spectrum, July 2017. <http://www.zdnet.com/article/telco-groups-at-war-over-5g-spectrum/>