

Ref: BN16/1342

10 June 2016

Pauline Sullivan
Assistant Secretary, Spectrum Branch
Department of Communications and the Arts
GPO Box 2154
Canberra ACT 2601

Dear Ms Sullivan

Consultation note on the Exposure Draft Radiocommunications (Spectrum Licence Allocation – Residual 700 MHz Band One) Direction 2016

I am writing to provide comment on behalf of the NSW Telco Authority in relation to the consultation note for the *Exposure Draft Radiocommunications (Spectrum Licence Allocation – Residual 700 MHz Band One) Direction 2016*. The NSW Telco Authority (Authority) is responsible for the overall coordination of operational communications services for the NSW Government, including spectrum holdings.

The Authority is of the view that any decision on the Vodafone proposal should first consider the currently unresolved and critical issue of the allocation of spectrum to States and Territories for a national Public Safety Mobile Broadband (PSMB) capability.

The Authority has presented a position on spectrum allocation in relation to PSMB in two previous submissions to the Productivity Commission's PSMB inquiry (one in August 2015 in response to the Issues Paper and the other in December 2015 in response to the Draft Report) and in its May 2016 response to the Department of Communication and the Arts *Legislative Proposals Issues Paper* on the Radiocommunications Bill 2016.

In our submissions, we stressed that an allocation of sufficient spectrum in the appropriate segments is essential for PSMB to work effectively. If this does not occur, public safety officers and volunteers face the risk of not having access to the most efficient and effective fit-for-purpose tools to do their jobs. We emphasise the importance of taking this into account when making decisions around the allocation of spectrum for commercial uses.

If you require further information, please contact Debbie Dekker, Director Business, Performance and Strategy, at the NSW Telco Authority on 02 9372 8381 or via email Debbie.Dekker@finance.nsw.gov.au.

Yours sincerely,



Kate Foy
Managing Director
NSW Telco Authority